

September 9, 2022

Island Regulatory and Appeals Commission
134 Kent Street #501
Charlottetown, PE C1A 7L1

RE: APPLICATION FOR ADDED PARTY INTERVENER STATUS

The Prince Edward Island Federation of Agriculture (PEIFA) is applying for Added Party Intervener status in IRAC item UE22503 – MECL – Rate Design – June 30, 2020. This item deals with the matter of Section 10, 13(1) and 20 of the Electric Power Act (R.S.P.E.I. 1988, Cap. E-4) and in the matter of the application of Maritime Electric Company, Limited for an order approving a four year rate design plan for Stage 1 changes to Residential, General Service, Large Industrial and Street Lighting classes for electric service commencing and for certain approvals incidental to such an order. It also deals with the matter of Section 12 of the Island Regulatory and Appeals Commission Act (R.S.P.E.I. 1988, Cap. 1-11) and in the matter of the Application of Maritime Electric Company, Limited for an order varying paragraph 31 of Order UE20-06 and for certain approvals incidental to such an order.

The PEIFA is the province's largest general farm organization representing the direct membership of approximately 600 farm operations, as well as 16 different commodity associations featuring the broad spectrum of agriculture on PEI. The organization represents the largest industry of Prince Edward Island, providing over \$500 million to the provincial GDP in 2021 and directly employing over 4000 people annually.

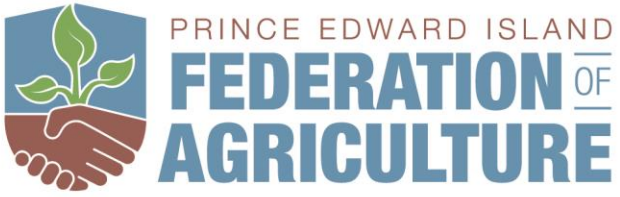
As major users of electricity in Prince Edward Island, the agriculture industry has much at stake when it comes to any changes in electricity rates or rate structure. In particular, the proposed elimination of the residential second block will have a significant impact on the cost of production in Prince Edward Island agriculture. As such, the PEIFA requests Added Party Intervener status to properly represent its members.

The interest of the PEIFA in the hearing stems from its representation of the electricity users in the agricultural sector. The proposed changes to the rate structure will dramatically change the economics of farming on Prince Edward Island. This interest is distinct from Maritime Electric and the Island Regulatory and Appeals Commission. With over 600 farms and 16 commodity groups represented by the PEIFA, the Added Party Intervener status will allow the critical stakeholders in PEI agriculture to be properly represented in the hearing.

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The PEIFA, on behalf of its members, will provide the hearing with subject experts to give evidence that shows that the proposed changes will exceed the necessary revenue-to-cost targets to more than 120%, causing farms on Prince Edward Island to significantly over contribute to the electricity system. Added-Party Intervener status for the PEIFA will have a negligible impact on the cost and complexity of the proceeding.

This application is submitted by PEIFA President Ron Maynard:

Ron Maynard
President
PEI Federation of Agriculture

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