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April 14, 2025

Via Electronic Mail: nmckenna@csmlaw.com

Nicole McKenna Carr, Stevenson & MacKay 65 Queen Street Charlottetown, PE C1A 7L1

Dear Ms. McKenna:

Re: Requests for Intervention - MECL On-Island Capacity Application (Docket UE20742)

I am replying to your email dated April 8, 2025, which attached three requests for intervention in relation to the above Application.

MECL's response is as follows:

- 1. MECL has no objection to the Prince Edward Island Energy Corporation intervening as an Added Party to the Application.
- 2. MECL has no objection to Mr. Bevan-Baker intervening as a Friend of the Commission Intervener on the condition that his involvement will be limited, as stated in his April 4, 2025, correspondence, to a verbal submission supported by a written statement. We suggest it would be appropriate to place a reasonable time limit on the verbal statement and to have the written statement filed a reasonable period in advance of the hearing.
- 3. MECL has no objection to Energy Democracy Now! (EDN) intervening as a Friend of the Commission Intervener but does object to the nature and scope of its proposed participation. We note that EDN intends to, among other things, submit evidence and arguments and to cross-examine witnesses. Pursuant to section 14(1)(b) of the Commission's Rules of Hearing Practice and Procedure, a Friend of the Commission Intervener is not ordinarily vested with all of the rights of a party. In MECL's submission, EDN's involvement should be limited to the same extent as Mr. Bevan-Baker's.
- 4. In supporting Mr. Bevan-Baker's and EDN's requests to intervene, MECL takes no position on whether either of these requests meet the definition of Friend of the Commission Intervener. MECL's position is motivated by a desire to balance community involvement with the efficient conduct of this important and time-sensitive Application.

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Yours truly,

Stewart McKelvey

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*Law Corporation