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May 19, 2026

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Island Regulatory and Appeals Commission
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AFFIDAVIT

C A N A D A

PROVINCE OF PRINCE EDWARD ISLAND

**BEFORE THE ISLAND REGULATORY
AND APPEALS COMMISSION**

IN THE MATTER of Section 17(1) of the *Electric Power Act*, RSPEI 1988, c. E-4 and **IN THE MATTER** of the Application of Maritime Electric Company, Limited for an order of the Commission approving the 2026 Capital Budget and for certain approvals incidental to such an order.



REQUEST FOR CONFIDENTIALITY

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6. Public disclosure of the CEII could be useful to a person in planning an attack on Critical Infrastructure. It is common for electric utilities to keep this information confidential. North American Reliability Corporation ("NERC") Rules of Procedure Section 1500 (confidential information) covers this (Maritime Electric is not NERC regulated, but its Rules provide good utility practice).
7. Attached as Exhibit "A" are NERC Rules Section 1500 regarding confidential information, and the entire document is available at: https://www.nerc.com/globalassets/who-we-are/rules-of-procedure/nerc-rop-with-appendices-eff-20250520_signed.pdf. For example, NB Power is NERC regulated and have made similar confidentiality claims in the past: [https://www.nbpower.com/media/1493765/claim](https://www.nbpower.com/media/1493765/claim_for_confidentiality.pdf)



EXHIBIT A

NERC RULES SECTION 1500

2. **Information Exchange** — NERC and the Regional Entities are authorized to exchange Confidential Information to perform their respective statutory and delegated functions, including, but not limited to, evaluations, Compliance Audits, and Compliance Investigations in furtherance of the Compliance Monitoring and Enforcement Program, on condition they continue to maintain the confidentiality of such information consistent with the delegation agreement.

1507. Remedies for Improper Disclosure

Any person engaged in NERC or Regional Entity activity under Section 215 of the Federal Power Act or the equivalent laws of other Applicable Governmental Authorities who improperly discloses Confidential Information may lose access to Confidential Information on a temporary or permanent basis and may be subject to adverse personnel action, including suspension or termination. Nothing in Section 1500 precludes an entity whose information was improperly



INTERROGATORIES

such, one RO-EDI treatment train will be taken out of service at a time to complete the necessary upgrades. The risk of a forced outage is increased due to the availability of only one RO-EDI treatment train while the work is being completed, however, this risk is further mitigated by completing the necessary work during the time of year when on-Island dispatchable generation is required less frequently.

IR-4 Section 4.4 – Borden Generating Station – Turbine Generators

- a. Table 5 in Maritime Electric’s Supplemental Capital Budget Request for MECL’s On-Island Capacity for Security of Supply Project (Docket UE20742) indicates decommissioning of CT1 and CT2 will take place in 2031 and 2033, respectively.
 - i. Provide any updates that Maritime Electric has made to these dates.

