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All the time.



June 18, 2026

Ms. Cheryl Bradley
Island Regulatory & Appeals Commission
PO Box 577
Charlottetown PE C1A 7L1



Dear Ms. Bradley:

**UE20606 – ECAM Rate Adjustment Application
Response to Additional Interrogatories from Commission Staff**

Please find attached the Company's responses to additional interrogatories from Commission Staff with respect to the Company's Application for an Order to Approve an ECAM Rate Adjustment filed with the Commission on December 11, 2025.

An electronic copy will follow.

If you have any questions or concerns, do not hesitate to contact the undersigned at 902-629-3641.

Yours truly,

MARITIME ELECTRIC

A handwritten signature in blue ink that reads "Gloria Crockett".

Gloria Crockett, CPA, CA
Director, Regulatory & Financial Planning

GCC28
Enclosure



INTERROGATORIES

**Responses to Additional Interrogatories
of
Commission Staff**

**ECAM Rate Adjustment Application
(UE20606)**

Submitted June 18, 2026



Affidavit

CANADA

PROVINCE OF PRINCE EDWARD ISLAND

**BEFORE THE ISLAND REGULATORY
AND APPEALS COMMISSION**

IN THE MATTER of Section 3(a), 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 an Energy Cost Adjustment Mechanism rate adjustment to customers' bills for the period March 1, 2026 to February 28, 2027 and for certain approvals incidental to such an order.

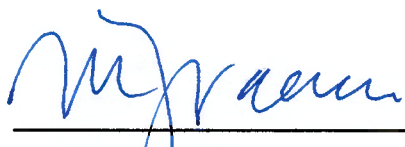
AFFIDAVIT

I, T. Michelle Francis of Emyvale, in Queens County, Province of Prince Edward Island,
MAKE OATH AND SAY AS FOLLOWS:

1. I am the Vice President, Finance and Chief Financial Officer for Maritime Electric Company, Limited and as such have personal knowledge of the matters deposed to herein, except where noted, in which case I rely upon the information of others and in which case I verily believe such information to be true.
2. I prepared or supervised the preparation of the attached Interrogatory responses and to the best of my knowledge and belief the responses are true in substance and in fact.

SWORN TO at Charlottetown,
Prince Edward Island, the 18th
day of June, 2026.


A Commission for taking affidavits in the
Supreme Court of Prince Edward Island


T. Michelle Francis



Interrogatories

The Island Regulatory and Appeals Commission (the “Commission”), in assessing the reasonableness of the Application requesting Approval for an Energy Cost Adjustment Mechanism Rate Adjustment (the “Application”), submitted by Maritime Electric Company, Limited (“Maritime Electric” or “MECL”), requests responses to the following interrogatories:

IR-29 Regarding IR-11(d), MECL stated:

"In 2025, Maritime Electric credited approximately 37 million kWh of credits to net metering customers ... \$3.3 million have been shifted to non-net metering customers ... rate impact of approximately 1.2 per cent for all other customers."

- a. Approximate the fixed costs avoided by net metering customers associated with energy produced and consumed by the customer in real time (i.e., energy that is used by the customer and not exported to the system).
- b. Is it reasonable that a net metering customer would not pay for fixed system costs for self-supplied energy, given that its self-supplied energy source would be inoperable without system supports provided through its connection to MECL's system?

Response:

- a. Maritime Electric currently has no means to accurately measure the amount of energy that is produced by a customer's net metering system and consumed by the customer in real time. This energy production and consumption is referred to as “behind the meter,” and as such cannot be reliably measured by the utility at this time.

However, Maritime Electric estimates broadly that approximately one third of energy produced by net metering systems is consumed in real time by customers while two thirds is exported to the grid. The 37 million kilowatt-hours (“kWh”) referenced in the Company's Response to IR-11(d) represents the portion of energy exported to the grid (i.e., two thirds) and measured by Maritime Electric through reverse-flow meters. Therefore, the Company estimates that approximately 18.5 million kWh is produced by the net metering systems and consumed by customers in real time behind the meter.¹ By self-supplying energy through net metering systems and avoiding the purchase of energy from Maritime Electric at the retail price of approximately 17¢/kWh, additional delivery costs of approximately \$1.7 million have been shifted to non-net metering customers.²

When combined with the 37 million kWh of energy exported to the grid and credited to net metering customers, total delivery costs of approximately \$5.0 million have been shifted to non-net metering customers.³ This represents an electricity rate impact of approximately 1.7 per cent for all other customers.⁴

¹ 37 million kWh / 2 = 18.5 kWh.

² 18.5 million kWh x \$0.09 = \$1.7 million.

³ \$1.7 million + \$3.3 million (from the Response to IR-11(d)) = \$5.0 million.

⁴ Based on the 2025 revenue requirement of approximately \$299 million, the rate impact is \$5.0 million / \$299 million = 1.7 per cent.

- b. Net metering customers avoid paying for fixed system costs for self-supplied energy in addition to the energy exported to the grid in exchange for credits. The Island Regulatory and Appeals Commission is also correct in stating that net metering systems are inoperable without the support provided by Maritime Electric's system.⁵

Fixed system costs (i.e., demand-related costs) are primarily driven by the system peak, which typically occurs during the winter months in the evening when there is no solar energy generation. Net metering customers benefit from the full use of Maritime Electric's system during peak periods, when their demand is high and their net metering systems are not generating. The approved residential rates are designed such that a portion of the rate recovers the fixed costs (e.g., 9¢/kWh) associated with the delivery infrastructure required to serve customers during the system peak. As a result, net metering customers avoid paying for a significant portion of these fixed system costs.

Like other jurisdictions, Maritime Electric does not consider it fair and reasonable for customers that net metering customers avoid paying for these fixed system costs, despite using the system fully during peak periods. However, as discussed in Response to IR-13(a), the statutory obligations imposed under the *Renewable Energy Act* state that Maritime Electric is unable to set fees or charges for net metering customers that differ from other customers of the same rate class.⁶

⁵ The only exception would be if a customer has additional equipment (e.g., one with battery energy storage) with protection devices that disconnect it from the grid, however, these systems are very rare.

⁶ Exhibit M-4.

IR-30 Provide a Capacity Resource Adequacy Assessment table for the actual capacity sources and amounts for the years 2023, 2024 and 2025.

Response:

Table IR-30 provides the actual capacity sources and amounts for the years 2023, 2024 and 2025.

TABLE IR-30			
2023 to 2025 Capacity Resources (MW)			
	2023	2024	2025
Prior year forecast capacity requirement ⁷	311	348	386
Actual Maritime Electric peak ⁸	359	310	346
Capacity Resources			
Point Lepreau	29	29	29
NB Power firm capacity purchases	173	180	185
NB Power short-term capacity purchases ⁹	0	0	0
Wind effective load carrying capability (ELCC) ¹⁰	21	23	23
Combustion Turbine No. 1	15	15	15
Combustion Turbine No. 2	25	25	25
Combustion Turbine No. 3	49	49	49
Total¹¹	312	321	326

As discussed in Section 5.6 of the Application, the Company was required to purchase additional capacity above the amounts forecast in the GRA in 2024 and 2025 to meet customer load requirements. This additional capacity was procured through the EPA, reflects the additional energy purchases required to meet capacity needs beyond the GRA forecasted levels, is consistent with the Company's obligation to serve customers under the Electric Power Act and, as such, the additional cost of capacity has been appropriately deferred to ECAM.

⁷ The prior year forecast capacity requirement is based on the P50 peak forecast (i.e., forecast has a 50 per cent probability of being too high and a 50 per cent probability of being too low) and includes a 15 per cent planning reserve margin.

⁸ The actual peak can vary significantly from the forecast depending on weather and other factors such as the rate of electrification and population growth.

⁹ NB Power short-term capacity purchases represent capacity that is purchased above levels prescribed in Maritime Electric's Energy Purchase Agreement with New Brunswick Energy Marketing Corporation when it is reasonably available for purchase.

¹⁰ Wind ELCC is a probabilistic calculation that determines the amount of wind capacity that can be counted as a capacity resource. At time of peak, the wind output may vary from the ELCC depending on the actual wind conditions present.

¹¹ Historical total capacity resources supplied or purchased may be higher or lower than the prior year forecast capacity requirement or the actual Maritime Electric peak due to several factors, including but not limited to actual wind generation and the availability of short-term capacity from NB Power during the peak.