

May 16, 2025

Island Regulatory & Appeals Commission
PO Box 577
Charlottetown PE C1A 7L1



Dear Commissioners:

**On-Island Capacity for Security of Supply
Docket UE-20742**

Maritime Electric Company, Limited ("Maritime Electric" or the "Company") hereby submits its Request for Confidentiality of those details and documents filed with the Island Regulatory and Appeals Commission ("IRAC" or the "Commission") with respect to the On-Island Capacity for Security of Supply Project ("Project") Application ("Application"), certain associated interrogatory responses and discussions to be held during technical sessions. The Company requests confidential treatment of the information and objects to the disclosure of any abridged versions thereof.

The Company requests confidentiality of submitted information and responses with respect to:

Energy Supply Contracts and Pricing

Generally, the request for confidentiality of energy supply contracts and pricing information is based on the following reasoning:

- The commercial terms of the NB Power Energy Purchase Agreement ("EPA") are a result of negotiations that reflect and factor each party's generation assets, the Buyer's energy, capacity and ancillary service requirements and the Seller's dispatch order obligations. The EPA defines the use of firm, secure and assured energy for the purpose of determining the order of purchase.
- The Maritime energy market has relatively few participants. The seller has expressed serious concerns about providing the details of the EPA to additional parties, particularly those located in the Maritimes, based on the relatively small number of participants.

Specifically, Maritime Electric requests confidentiality of the following confidential appendices:

Application Confidential Appendix D

This appendix contains commercially sensitive information pertaining to Maritime Electric's EPA with NB Power.

Application Confidential Appendix E

This appendix contains commercially sensitive information pertaining to Maritime Electric's EPA with NB Power.

Specifically, Maritime Electric requests confidentiality of the following interrogatory confidential attachments:

Synapse IR-2

This response includes attachments "IR-2d – Confidential Attachment 1" and "IR-2e – Confidential Attachment 1" that contain commercially sensitive information pertaining to Maritime Electric's EPA with NB Power and commercially sensitive indicative capacity pricing from NB Power.

As required by the *Electric Power Act* under Section 12.2, Maritime Electric has an obligation to consult with the PEI Energy Corporation ("PEIEC") in relation to the supply or generation of electric energy. Therefore, Maritime Electric grants permission for the Commission to disclose and distribute Application Confidential Appendix D, Application Confidential Appendix E and Synapse IR-2 confidential attachments to the PEIEC.

With regards to the technical session requested for the week of May 26, 2025, Maritime Electric agrees that the PEIEC, as an Added Party Intervenor, may be present for the technical session for the reasons noted above. The Company requests that Peter Bevan-Baker and Energy Democracy Now! Cooperative Limited, both Friend of the Commission Intervenors, and members of the public be absent from the technical session due to the confidential information listed above that may be presented and discussed. Maritime Electric believes that it will be beneficial to discuss the confidential information during the technical session, as it forms an important part of the justification for the Project.

Maritime Electric respects the Commission's responsibility to review all aspects of costs for which the Company seeks recovery from its customers. The Company does not object to providing the requested commercially sensitive information to the Commission on a confidential basis. However, Maritime Electric does object to the public disclosure or distribution of information to third parties and, therefore, requests that it be considered confidential.

Yours truly,

MARITIME ELECTRIC



Michelle Francis
Vice-President, Finance & Chief Financial Officer

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Enclosure