

10 August, 2026
Prince Edward Island Regulatory and Appeals Commission
c/o Cheryl Bradley, Director of Finance & Regulatory Affairs
(electricityinquiries@irac.pe.ca)

Dear Ms. Bradley,

RE: On-Island Capacity Application (UE20742) – Written Comments

Energy Storage Canada (ESC) is the national trade association representing over 115 companies across the energy storage value chain – technology providers, project developers, investors and operators, utilities, electricity distribution companies, and NGOs. As the national voice for energy storage, ESC appreciates the opportunity to provide comments on Maritime Electric’s application and supplemental filing regarding proposed on-island capacity additions.

1. As jurisdictions across Canada evaluate options to meet reliability needs, recent procurement outcomes show that battery storage is increasingly capable of competing directly with conventional generation. Ontario’s Long-Term 2 (LT2) Capacity Stream awarded all 640 MW of successful contracts to battery storage in a fully technology-neutral process, providing one of the clearest Canadian benchmarks for storage as a reliability resource. Earlier this summer, LT2-C also demonstrated that eight-hour storage projects could be procured at roughly 36 percent lower cost than earlier Ontario procurements, reflecting falling capital costs and improved performance. These results highlight a broader trend: modern battery storage continues to decline in cost and increasingly delivers reliability services at competitive, and often lower, evaluated costs than traditional peaking assets. This continues to underscore the importance of using current market data when comparing storage and conventional generation.
2. ESC encourages continued consideration of storage alternatives in Prince Edward Island’s planning and regulatory processes. Storage can provide fast-responding contingency support, peak demand management, and operational flexibility that complements both existing infrastructure and future renewable additions. As demand grows and reliability pressures increase, modular storage deployments can also be delivered more quickly than conventional generation, offering near-term system benefits while larger infrastructure projects advance.
3. Finally, ESC supports ongoing collaboration between the Province, Maritime Electric, and IRAC to ensure that interconnection processes, procurement frameworks, and planning assumptions reflect current storage capabilities. Clear and technology-neutral evaluation pathways will help ensure that future reliability solutions are cost-effective, adaptable, and aligned with provincial energy and climate objectives.

Thank you for the opportunity to provide comments on this important proceeding.

Sincerely,



Justin Rangooni
Chief Executive Officer
Energy Storage Canada