

9 May, 2025

Prince Edward Island Regulatory and Appeals Commission

c/o Cheryl Bradley, Senior Financial Advisor

(electricityinquiries@irac.pe.ca)

Dear Ms. Bradley,

**RE: On-ISLAND CAPACITY APPLICATION (UE20742), WRITTEN COMMENTS**

Energy Storage Canada (ESC) is the national trade association dedicated to accelerating the deployment of energy storage projects and technologies<sup>1</sup>. Please find below written comments from ESC regarding the application with the Regulatory and Appeals Commission seeking approval of a supplemental capital budget request for a proposed “on-island capacity for security of supply project.”

1. In North America’s major competitive electricity markets, Battery Energy Storage Systems (BESS) are demonstrably a cost-effective option for meeting electricity system needs. This is the case not only for balancing supply and demand, but also providing essential grid reliability services, and acting as transmission and distribution capacity to defer or delay infrastructure investments. Maritime Electric’s application to develop a 10 MW / 40 MWh BESS is a positive step for energy security in PEI and is aligned with the direction of the electricity sector in many provinces and states.
2. In addition to BESS at this larger scale, behind-the-meter batteries as demand-side management (DSM) initiatives have an important role to play in future. ESC also urges continued collaboration between the province, its utilities, and their regulator to advance the interconnection processes, rate designs, and programs that will enable more demand-side flexibility from these Distributed Energy Resources (DERs).

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

Very best regards,

*KL Benson King*

Leone Benson-King  
Vice President, Corporate Services  
Energy Storage Canada

---

<sup>1</sup> For further information, please visit: [www.energystoragecanada.org](http://www.energystoragecanada.org)