

**From:** [Roger King](#)  
**To:** [Cheryl Bradley](#)  
**Subject:** RE: Application for On-Island Capacity for Security of Supply Project Commission Docket UE20742- MECL Accelerated Capacity Solution  
**Date:** Saturday, September 20, 2025 8:20:47 AM

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Commissioners:

It is disappointing to witness the degradation of our electricity regulation process to a brinkmanship situation evolving from MECL's August Supplemental Application that dictates immediate financial commitments against a background of threatened rotating electricity outages. It appears that the Commission has no alternative other than to approve the Construction WIP Deferral Account BUT this approval, I suggest, should be conditional.

In February this year, MECL unilaterally refused the offer from NB Power to participate in 100MW of new capacity from the planned 500MW CT generating station in Centre Village, NB. This was to be a 25 year Service Agreement, not a capital investment, yet it has been presented by MECL as an unacceptable alternative to the original Supplemental Application of December 2024. An alternative scenario could have been for MECL to accept the new participation as an insurance against the central concern of reduced availability of future mainland Capacity, and then presenting the August Supplemental Application as a potentially lower cost Capital Alternative to that presented in December 2024.

Therefore the conditions for the Commission's Deferral Account approval might be:

- 1) Direct MECL to recover a 100MW commitment of new, long-term capacity from NB Power
- 2) Direct MECL to withdraw the December Supplemental Application
- 3) Direct MECL to submit a timely Supplemental Application for the remaining On-Island capacity that is required considering the 100MW CT generation to be installed in Charlottetown in conjunction with the new NB Power commitment for an additional 100MW mainland capacity.

I respectfully request that the Commission accept this public input as an exception to, but in concert with, the directive given to the Application Interveners to submit their input by Tuesday, 23rd September 2025

Thank you,  
Roger King