TO: Commission Clerk, Island Regulatory and Appeals Commission (IRAC) **RE:** DOCKET UE20742 – Maritime Electric Application for On-Island Capacity **DATE:** March 22, 2026

To the Commissioners:

I am submitting this letter of comment regarding Docket UE20742 to formally oppose the immediate approval of Maritime Electric's request for $334 million in capital expenditure for two combustion turbines.

While the Island's 112-megawatt capacity deficit is real, the Commission has a fiduciary duty to protect ratepayers from rushed, monolithic debt. Maritime Electric is using arbitrary vendor deadlines dictated by New Brunswick Power and ProEnergy to force a third of a billion dollars in fossil-fuel infrastructure through the regulatory process without comparative due diligence.

Before authorizing this massive transfer of public wealth to a private monopoly guaranteeing a 9% return, the Commission must hit pause and mandate a formal, independent engineering and financial feasibility study on a structurally superior alternative.

I submit that the Commission should direct the **PEI Energy Corporation (PEIEC)** to commission an independent feasibility study on a **100 MW Eastern Grid Security Asset** located at the Georgetown deep-water port.

As a project promoter and advocate for Island energy security, I propose that this study must formally evaluate the following structural advantages of the Georgetown model:

1. Comparative Analysis of Ownership Structures IRAC must not assume that a Fortis-owned monopoly asset is the only financial vehicle for baseload generation. The PEIEC-commissioned study must rigorously model and compare three distinct ownership structures for the Georgetown facility: a **Private Utility** (Independent Power Producer), an **Investment Utility** (e.g., a pension, community, or indigenous investment consortium), and a **Public Utility** (Crown-owned via PEIEC). The objective is to identify which financial structure delivers the lowest long-term lifecycle cost to the PEI ratepayer.

2. Eastern Grid Transmission Stabilization Maritime Electric's plan centralizes assets in Charlottetown. An engineering review must model the physical grid benefits of placing a 100 MW spinning mass at the extreme eastern edge of the grid. The study should evaluate how this facility, paired with 138 kV transmission corridor upgrades, would structurally resolve the chronic voltage sags and line losses currently plaguing Kings County.

3. Marine Logistics and Regional Fuel Sovereignty The study must assess the viability of utilizing the historic East Isle Shipyard as a marine-import terminal. By using tugs and barges, this facility could import sustainably certified, low-grade forestry residuals from stranded assets in Nova Scotia and New Brunswick. A logistics study will determine if this regional supply chain can provide 90% of the required baseload fuel, keeping energy dollars inside the Maritimes while safely utilizing local PEI agricultural waste for the remaining 10%.

4. A Location-Specific Geographic Synergy: Bio-Circular Integration The physical location of the East Isle Shipyard provides a rare, site-specific engineering advantage.

Because the footprint lies directly adjacent to Georgetown’s municipal wastewater lagoon, engineers must evaluate the potential to utilize the town's treated effluent as the plant's primary cooling source. This geographic proximity allows the power plant to operate as a net-zero freshwater user while actively remediating a local waste stream—a structural synergy that is physically impossible to replicate at the utility's proposed Charlottetown site.

Conclusion: Committing $334 million to a centralized, fossil-fuel asset without first funding a formal engineering study on a decentralized, bio-circular alternative is regulatory negligence.

I respectfully request that the Commission decline the immediate approval of UE20742 and formally mandate that PEIEC execute a comprehensive engineering and financial study on the Georgetown model to ensure Islanders receive the best grid and ownership solution, not just the fastest utility solution.

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