

Post-hearing written submission

Peter Bevan-Baker, Friend of the Commission Intervener.

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Dear Commissioners,

I appreciate the opportunity to make a post-hearing submission in this pivotal hearing. As I said during my oral presentation last week, I have never participated as an intervener in an IRAC hearing previously. The reason I am on this occasion is that I recognised from the moment I saw the sheer size of the proposed investment involved in the original application, that the outcome of this singular hearing will have a profound impact on the future of our electrical system and on Islanders' pocketbooks for generations to come. I consider this to be the most consequential decision that this Commission has ever made on the electricity file, and appreciate the careful consideration and awareness of the weighty implications of this docket that the Commissioners will doubtless give it.

As I also said last week, I am not an electrical engineer, I am not schooled in energy systems nor am I an economist. I am trained as a dentist, and more recently for over 1 decade have worked as an elected representative of the people as an MLA in Prince Edward Island's legislature. In both those roles I have sought every day to solve problems in the best interests of those I work for - formerly my dental patients, laterally the residents of district 17, New Haven Rocky Point, and in my role as energy critic (the hat I have worn during these proceedings) on behalf of all residents of PEI.

In my previous submissions I have provided references and citations, and approached my work very much through a technical lens, but in this final post-hearing document, I am speaking more from what I heard and from the direct experiences I had during the hearing.

I have approached this docket from the original application in December 2024 to the present day through the lens of what investments we need to make in order to meet our immediate and future energy needs whilst protecting the interests of those who will ultimately pay for whatever decision is made: Islanders.

I was asked by Chair Williams at the conclusion of my remarks whether I agreed that there is a capacity deficit of concern on PEI, with which I concurred. Where Maritime Electric and I diverge is in how best to navigate the current shortfall, and in how to invest prudently in a way that will create the modern, secure, clean and affordable energy future Islanders need and deserve. My quarrel is not with the proposition that we need capacity: it is with what we are being asked to buy, from whom, at what price, in what order, and on how little information.

I was also asked by Chair Williams whether I thought that 50% was a reasonable goal for on-Island capacity production. I was equivocal on this. Prior to 1977 when the first two cables were installed, PEI produced all its energy and met 100% of its capacity needs on-Island. It has varied since then, and sits at a relatively low figure today, however, I find no well-founded or credible evidence to suggest that there is a “right” number for this, or that Maritime Electric’s goal of 50% has a basis in anything evidentiary. If this number is being used in any substantial way to guide the decision, I find this to be troubling, particularly in the context of the rapidly and profoundly evolving energy sector, locally, regionally, and globally.

The presence of sub-sea cables allowed PEI to change its energy mix dramatically, and the installation of the second pair of cables, and the predictable contribution of expanded energy and capacity that they brought was a critical factor in the ultimate decommissioning of the steam plant in Charlottetown. Today we sit on the brink of another set of even larger cables being added to connect us to the rest of the region, and it is prudent to once again review how this new reality will impact our system. An Integrated System Plan would be an invaluable asset in crafting what the

best energy future would look like for PEI, but sadly we don't have an up-to-date one.

We must look at our sub-sea cables no differently than the overland transmission lines that connect customers everywhere to the power they use. Indeed comparative studies show that buried cables, whether underground or underwater are inherently more secure and reliable than overhead transmission lines. I lived in Eastern Ontario during the ice storm of 1998, and saw first hand the fragility of terrestrial towers and wires during a protracted severe weather event.

Disconnection of the Island is not, as was stated repeatedly during the hearing, a zero probability event. However, we are a lot less vulnerable to disconnection events because of the location and design of the cables. And with each cable added, our vulnerability decreases. We need not consider our province as any more isolated or cut-off from the centralised energy corridors than most other provinces, and are indeed in a far better position than some.

I am spending a bit of time on this in my final submission as it didn't really get discussed much during the proceedings, and with my limited time to present, it's not something that I focused on in my oral remarks. Buried cables, whether underground or undersea, are protected from weather, ice, and falling trees. The main reason why cables are not all buried is because of cost. In all other respects it is better and safer to choose the more reliable option of underground (or undersea) cables. Since there is no alternative but to place the interties to the mainland underwater, the comparative cost savings isn't an issue. The cables automatically enjoy all the benefits of not being exposed to the inherent dangers of overhead wires. Of course there are potential dangers underwater also - ship anchors and fishing gear, for example - but these are far less likely to cause the regular problems that are encountered when trees fall on lines, or when our increasingly frequent and severe storms hit.

This context frames the argument that with more intertie capacity, the increasing energy and capacity needs that we all agree are coming can be reliably met through imports if two other things are met. Firstly, the transmission capability on the other side of the strait is improved - as is already planned - and secondly, that future projects, some of which are already under construction or completed in Newfoundland, Nova Scotia, and New Brunswick are available to provide the energy and capacity requirements of the future.

The exact timing of these improvements is currently unknown, and even though the medium and longer term horizons of planning to meet capacity needs will certainly be able to consider these resources in a comprehensive Integrated System Plan, we still must deal with the immediate concerns related to the current capacity shortfall. I will note here that the NPV analysis of the relative costs of being able to provide capacity on-Island versus imported power assumes that we will be purchasing that capacity for the next 50 years. It is almost impossible to foresee what advancements will occur over the next 5 or 10 years, never mind half a century, that will make the basis of Maritime Electric's NPV study utterly redundant. As Mr. Fagan said, the advancements in a very short time in only one area - that of battery storage technology - have been "stunning". Add to that the plummeting costs of renewables over the last decade that has completely transformed the energy marketplace, and you begin to understand what a rapidly evolving sector this is, and what dramatic changes have occurred, and will almost certainly continue to do so in a short timeframe.

The central tenet of the Maritime Electric proposal before the Commission is that it is the quickest, cheapest, and most resilient way to meet this immediate capacity deficit. As I argued in both my written submissions to date, and in my oral presentation last week, I strongly dispute these claims, and much of the evidence on which they are built. I do not believe that alternatives were fully investigated. It has become clear that the rationale and body of evidence supporting the relative cost of the PE6000 opportunity compared to battery storage and new incremental renewable

production is significantly flawed. It is also my belief that in addition to the erroneous economic metrics used to compare CTs and BESS, that other potential contributing elements to a comprehensive, integrated approach to meet the immediate capacity and energy deficits were not considered properly - in some cases not at all, and in others inadequately.

Huge changes are currently occurring at great speed in the energy field. Solar, wind, and other renewables paired with battery storage are supplanting our century and a half dependence on coal, oil, and gas to the extent that well over 90% of all new generating capacity worldwide in the last few years has been from clean, green, non-emitting sources. On top of that global transformation, we see big changes underway across Canada as a national commitment to an integrated electricity grid from coast to coast to coast is well under way. There is already a multi-million dollar commitment from the federal government to fund the initial steps to increasing the capacity of the intertie between our province and our regional neighbours through the installation of two new subsea cables. This will increase the capacity by up to 400 MW more than the 560 MW nameplate capacity that we currently have. Work is also underway on transmission line upgrades on the other side of the cables, and on large new generation projects in New Brunswick, Nova Scotia, and Newfoundland.

So much is changing so fast that it would be irresponsible to make a hasty decision with dubious statistics to support the application before us. I suggested in my written submission in July 2026 that we need to ask the question; do we need to meet the entire estimated capacity shortfall all at once? With new information since I mused on that pivotal question now available, I feel more strongly than ever that the unequivocal answer is no.

One of the challenges I have encountered during this process is the inability of interveners designated as Friends of the Commission to ask questions. This has meant that I must challenge Maritime Electric evidence and claims in the limited opportunities I have, such as in this post-hearing written submission. I found it disconcerting to hear repeatedly from

Maritime Electric's counsel that information not challenged directly during the hearing process stands as uncontested and accepted. I appreciated very much the direct questions from all Commissioners during the process last week, but with only one expert, Synapse, offering a contradictory position, and an extremely passive approach from the PEI Energy Corporation, many, many bits of crucial evidence from the thousands of pages presented by Maritime Electric weren't discussed or challenged at all.

Here are some of the areas that I would have relished asking questions on, and which together can, I believe, create the suite of resources necessary to meet our immediate capacity requirements without resorting to the purchase of the two PE6000 units.

1. It was only revealed at the eleventh hour during this proceeding, that an additional 15MW of firm capacity imports from New Brunswick Power has become available starting in 2027. This immediately reduces our estimated shortfall from 115MW in 2030 to 100MW. This is a hugely significant development, and must cause us all to review both the scale and urgency of all arguments put forward by Maritime Electric to support the application. If we are able to secure an extra 5MW for each of the next three years, is it possible to continue to add a similar amount, or more, in subsequent years? Will the arrival of the RIGS project make more capacity available to PEI beyond the 2029 cumulative increase of 15MW? With new cables in place, and enhanced transmission capability in New Brunswick and Nova Scotia, when can PEI expect to have access to more regionally based capacity and energy?

No doubt there are many more questions along this vein that need to have clear answers provided. Otherwise with the potential approval of this application, we are committing to an expense on a proposal that is anticipating an ongoing capacity deficit stretching out 5 decades that may not actually exist beyond the next few years.

2. I heard almost no discussion on seriously looking into the practicality and costs of delaying the decommissioning of CT1 and CT2 in Borden. Yes, these CTs date from the 70s, and are undoubtedly approaching the end of their lives, but - once again stressing the rapidly changing energy environment in which we are operating - it is entirely possible that with a coordinated approach employing a suite of alternative measures, that we will be able to deal with the longer term capacity shortfall once we navigate the next few years. The steam plant in Charlottetown operated beyond its originally estimated end of life date, and unlike the Borden CTs, the steam plant operated for much of its life providing baseload generation, not simply peaking power like the Borden CTs or CT3. The Borden CTs have therefore not been run anywhere near as long or hard as the steam plant was, and it is incumbent on Maritime Electric to show how much an estimated cost to keep these plants safely and reliably operational and available as peaking plants for even a few more years, before we commit to the PE6000 opportunity.
3. I spoke briefly during my oral presentation about the potential of the BESS currently being considered by the PEI Energy Corporation as a possible contributor to this suite of integrated measures to resolve our immediate capacity deficit and give PEI time to develop the most cost-effective, modern, reliable and clean solution we can to our long-term future energy and capacity needs. Moving rapidly to operationalise the results of the PEIEC Expression Of Interest for a battery could provide a large segment of the immediate capacity shortfall that we must address. The Effective Load Carrying Capability of the first 50 MW of a BESS within our energy system was rated very highly in the E3 study. This means that at a fraction of the cost, and almost certainly within a shorter time frame, the incorporation of this BESS into our system could provide a significant portion of the short term capacity required to guide us safely through the next few critical years.
4. Demand Response was discussed extensively during the hearing, for which I was grateful. It is something that gets short shrift in all of Maritime Electric's supporting documentation, but Synapse

suggested that Demand Side Management measures could, once again, make a significant contribution to meeting our immediate capacity shortfall. I would like to see a far more comprehensive report delivered on what potential reduction in our peak load an aggressive DSM regimen could achieve. It is my belief that both Maritime Electric and the PEI Energy Corporation have responsibilities to construct such a plan, and the finger pointing regarding who has failed in this area was disappointing to witness. We heard in testimony just how impactful DSM measures can be, and particularly if they are accompanied by a comprehensive education campaign. I am aware that the potential for reducing peak load is system-dependent, and I do not know where our Island grid sits on the spectrum, but typically studies I've read show that DSM has the potential to reduce peak loads by 10% or more. That translates to a 40MW reduction if our system is anywhere close to the median system. There was a very brief discussion on a software program that holds the potential to use the fleet of electric vehicles on PEI to contribute to managing our peak loads. This is only one of many new opportunities that will be available when full installation of smart meters is completed, and suggests that DSM could be a much larger contributor in navigating our immediate capacity concerns than it is given credit for.

5. Mr. Fagan described the potential of BESS paired with incremental additions of renewable energy sources as “stunning”. As the cost of batteries has greatly improved as a result of recent advancements, so has the chemistry and technology surrounding them. The issue of synchronous condensers was mentioned on a couple of occasions during the hearing. Initially by Mr. Coyne who told the Commission that the reason that the original application's recommendation to use Reciprocal Internal Combustion Turbines was replaced by the recommendation in the supplemental one to use Combustion Turbines was because of a desire to have synchronous condensing capability. At no point was it mentioned that BESS is also capable of providing synchronous condensing either in a hybrid model with a physical synchronous condenser as contemplated by Maritime Electric paired with the PE6000 CTs, or via synthetic inertia that the

battery system itself is capable of providing electronically. Asking Maritime Electric why, if the presence of on-Island synchronous condensers was such a pivotal aspect of this application, they did not even mention the capabilities of BESS to provide this service, was a significant oversight.

I have described above a number of individual potential contributors that in combination could meet the immediate challenge presented by our capacity shortfall. If we are able to allay the legitimate concerns about our immediate capacity deficit through such an integrated approach, the rationale for the immediate purchase of 100MW of capacity, and their associated costs which we must commit to for decades to come, evaporates.

Rightly so, the central concern of the proceedings was the capacity shortfall, but inescapably tied to it, and responsible for over 99% of the electricity used on PEI, is the energy demand and provision to meet it. The PE6000s will not contribute to our energy needs except on those rare times when we experience peak load. Energy from diesel combustion turbines is the most expensive, dirtiest power we use, costing around five times the price of renewables. If we look at the capacity challenge we face in concert with the energy needs that we must meet, the PE6000s help in only one area: renewables and batteries do both. Renewable sources are already less costly as an energy source, and are responsible for virtually all new generation capacity being added globally.

Maritime Electric would ask that we focus in this hearing exclusively on the question of meeting the immediate capacity shortfall. But when the systemic implications of the choices we make are considered, it is abundantly clear that an asset that contributes to the energy demands, stability of the system, and a host of ancillary services every day versus one that sits idle contributing nothing almost every day is a far more valuable asset. Nowhere in the NPV analyses (flawed as I already believe them to be) will you find any recognition or calculation of the very real financial benefits that a BESS would bring to rate payers through their

everyday contributions to our system. I don't know what the base rate for imported energy from New Brunswick Power is, as that number has been consistently withheld due to confidentiality concerns. I do know that the current agreement that Maritime Electric has with New Brunswick Power expires very soon and that inevitably the cost of imported energy - which is around three quarters of the power that Islanders use - will rise, and perhaps rise substantially. If we can, in making a decision on this docket, choose the option that provides that immediate capacity we need **and** creates further economic benefits for rate payers through producing cheaper, on-Island base rate power, that is the better option. If, however, we choose an option that can also meet our immediate capacity needs but provides no additional benefits, and indeed holds potential significant further costs such as unknown fuel price increases and penalties related to becoming a stranded asset, then we should take that into account also.

I mentioned in my remarks that I questioned the accuracy and objectivity of some of the information provided by Maritime Electric through reports and studies. There are many instances - and I cited a few of them - where data and evidence supplied by Maritime Electric have been shown to be inaccurate, incomplete, or misleading, and when challenged, have been amended in response to accusations of the same. Above all else, it is critical to the veracity of this process and ultimately to the confidence of the final decision by the commission, that the information upon which that determination is made can be fully relied upon. Given how often and how substantially some of the supporting evidence has changed, I put it candidly in this final post-hearing contribution that this is not the case.

Maritime Electric states clearly in their final pre-hearing submission that they do not doubt the sincerity of my engagement with this proceeding. I am appreciative of this admission, and if you look up the definition of sincerity, you will find this: *the quality of being honest of mind, free from pretense, deceit, or hypocrisy*. If I were asked to characterise Maritime Electric's engagement in this process, I would choose a different word. Maritime Electric is, after all, a corporation, and their ultimate goals are different from mine. I have been here simply and wholly to promote the

public interest and to advocate for a decision that aligns with the best interests of Islanders, present and future. Things are trickier for Maritime Electric who have a commitment to their shareholders, but through legislative guardrails, should propose investments that will not only provide the guaranteed rate of return they seek, but also align with Islanders' financial and environmental well-being. I would suggest that on many occasions it is abundantly clear that when these two stakeholders' needs are not aligned, that Maritime Electric has consistently chosen to place the interests of their shareholders above those of Islanders.

I won't reiterate here the series of specific concerns on the reliability of Maritime Electric's evidence that I voiced last week. I will, however, say a word about the errors contained in the very last table presented by Synapse which was prepared in haste. It was regrettable that it contained errors in duplication and one number pulled from one column erroneously into another. I feel that it is important to say that I highlighted a number of entries in the information from Maritime Electric that also contained errors, and, due to confidentiality concerns, much of the critical data that supports their contentions about Net Present Value calculations, and the comparisons made between the costs of the PE6000 CTs and battery systems remains unavailable to me.

I wish the singular table with the errors in Synapse's work that were discovered and conceded had never appeared, as I have great confidence in all the other data and conclusions reached by the Commission's own expert.

In this proposal, Maritime Electric has occupied three roles simultaneously: it is the proponent; it is also, through the consultants it hired and the cost study its own filing describes as "prepared by Maritime Electric," the principal analyst; and should the application be approved, it is the primary financial beneficiary. The Applicant's own answers make this plain. Asked whether there is a financial benefit to owning capacity rather than buying it, Maritime Electric answered: "Yes." Asked who bears the loss if these turbines become stranded assets, Maritime Electric answered that it would

seek to recover the remaining value from customers. The single largest cost - fuel - is passed through to customers, while the return on equity - \$123 million on this project alone - goes to the shareholder.

I am not alleging bad faith here: I am describing a structural problem that regulators have understood for decades. A utility earns a return on capital it invests, not on money it saves. Given two options that do the same job, the bigger, longer-lived, more capital-intensive one - with a fuel bill someone else pays - is worth more to the shareholder than the cheaper, cleaner one. That remains true even when the cheaper option is better for customers.

For these reasons and more, Prince Edward Island desperately needs to update its legislation that governs the private utility. At least one sitting legislator has attempted unsuccessfully to do this - but that is a debate for another day and another place.

The Commission need not speculate about where this leads. In June 2026 New Brunswick's Auditor General reported on NB Power's Tantramar project - the same supplier, the same refurbished turbines - and found that NB Power violated many tenets of good governance and process by picking a technology and committing to it before finishing its alternatives review, bypassing its own investment governance rules, and working under an urgency that was largely of its own making. Every one of those findings has a parallel in this record.

For a very long time now Maritime Electric has enjoyed the benefits of operating in a small market where their dominance has gone largely unchallenged. In the monopoly situation that Maritime Electric enjoys (outside of Summerside) across our entire province, tight regulation substitutes for competition. And that works as long as the regulatory framework is sufficiently strong, and there are robust laws that create a balance of strength between the regulator and the utility. Where it doesn't always work is where there is no public intervener (PEI, unlike New Brunswick and Nova Scotia does not have one.) It is important to note here that the only expert in this proceeding hired by the Commission rather than

by the Applicant - Synapse - recommended that the application be denied: twice.

Most people - and approximately three quarters of our electricity - arrive on Prince Edward Island across the Strait and through Borden. From there almost all travellers come to the Albany “Y”. At that point a choice needs to be made - East or West, Left or Right, Charlottetown or Summerside. The road layout, signage, and natural instincts all make for a complex - and for those unfamiliar with the territory - highly confusing decision. This hearing on Maritime Electric’s request for On-Island Capacity for Security of Supply Project (UE20742) has brought us to the “Albany Y” of decisions on our energy future. Prince Edward Island has a singular opportunity to choose one very distinct, clear path, or another.

It is indisputable that we must make considerable investments in our electricity system to meet growing demand and to ensure that Islanders have a modern, reliable, affordable, and clean grid that meets our needs today and into the future. What is in dispute is the manner in which we meet this challenge. Either we concur with the application before us from Maritime Electric, which will commit us to an expenditure so huge that alternative future investments will be severely restricted, and electricity rates for Islanders will be increased substantially for decades to come, or without putting Islanders at increased risk, we take the necessary time to make a prudent decision about what investments are needed, and consider the full range of options that are now available in a rapidly changing energy field.

To summarise this presentation, there is ample evidence of a litany of self-serving inaccuracies, omissions, and shifting numbers from Maritime Electric for us to ask the fundamental question, why should we have confidence in the most recent version of events and data coming forward from the same source? It is hard for observers to be sure of the accuracy of claims made - specifically in the area of costs - when so much information is withheld.

Regardless of the exact size and rapidity with which PEI will face a capacity gap, it is undeniable that it will happen, and we need a comprehensive plan to continue to provide reliable, secure and affordable energy to Islanders. The original application aimed at producing an additional 150 MW of capacity on-Island, and did contemplate a 10 MW / 40 MWh battery. However, throughout the document, and dating back to the last Integrated System Plan when batteries were described as uneconomic, it is clear that Maritime Electric does not view variable renewables and battery storage as a serious, established or reliable way to produce energy and provide dispatchable capacity.

Nothing could be further from the truth.

When I hear Maritime Electric executives, speaking of battery technology, make statements like “we don’t have the luxury of sitting back and trying something”, or “we can’t just wait and see if it’s going to work or not”, or “you don’t want to rely on a battery”, it is clear that they have no faith or interest in this technology. All these statements were made by Maritime Electric executives at the IRAC technical briefing on September 11th 2025. This is at odds with so many other jurisdictions all around the world, which are employing renewables paired with batteries at utility scale extremely successfully.

When you have a proponent who is so candidly prejudiced against the utility of battery storage, it is difficult to accept that a fair comparison has ever been made going right back to the December 2024 original application right up to today. It is true that in more recent pronouncements, the language from Maritime Electric on batteries is softer, but the litany of prior comments made in the very recent past suggests a much more ingrained, institutional bias.

Is the shortfall 115MW or 100MW, and when will the 40 MW output of the Borden CTs actually cease to be available, and what contribution can DSM make to reducing our peak load, and when will the EOI from the Energy Corporation result in a battery that could provide 50MW of the capacity

shortfall by itself, and what is the appropriate Effective Load Carrying Capacity for that first 50MW (or more) of battery storage? All these are live and critically important questions, whose answers will have a profound impact on whether the proposal before the Commission should be approved.

But what if the numbers are even more wrong than we already know? If the shortfall is less than E3 says, we shall have built a hundred megawatts of thermal generation we did not need, and Islanders will pay for it. If the error runs the other way, Islanders pay for that too, in rotating outages or in emergency power bought at whatever the region charges on the coldest morning of the year.

Whichever way it falls, the answer to who carries the risk is the same. It is the household in Montague and the small business in Alberton. Maritime Electric earns its allowed return upon whatever this Commission approves and the company then builds. Maritime Electric earns no more for having been right, and no less for having been wrong. The one party here that chose the consultant, framed the questions and decided which studies to commission is also the one party whose finances do not depend upon the answer being correct.

Making a side-by-side comparison of suitability and cost of thermal generation from diesel combustion turbines and firm capacity provided by battery storage is really where the crux of the decision before the Commission lies.

There are some data and claims by Maritime Electric in their various documents which are head scratchers, some of which I've already mentioned, but there's one real whopper, which stands out - even in a field of strong contenders - as in a class above, and it appears in their final pre-hearing submission dated August 6th.

In paragraph 17 where the relative costs of combustion turbines and battery storage are discussed, the claim is made, with no supporting

documentation, that, and I quote; “although the economics of battery energy storage systems appear to have improved relative to combustion turbines since the December 2024 application was filed, this should not be interpreted as an improvement in the economics of BESS itself. Rather the relative gap has narrowed because recent cost increases for CTs have made those alternatives more expensive; BESS has not become less costly for customers, but the overall cost of meeting Maritime Electric’s capacity needs has increased.” end quote.

Even a cursory examination of the markets and literature on the cost of battery storage shows just what a preposterous statement that is. The price of battery storage has plummeted over the last decade and more, and in the last 5 years alone has fallen by around 50%. There is one part of the quoted section which is, admittedly, accurate, and that is that the cost of CTs has increased, and dramatically so. In fact the cost has gone up so much that the original application had to be abandoned, and the sticker price of its replacement, the replacement ProEnergy opportunity, has already, in the matter of a few months, gone up substantially.

BESS prices are going down so fast that before any decision on this application is made, a fully up-to-date comparison from a variety of independent sources for the cost of a BESS of an appropriate size and duration for our immediate needs must be secured and held up against this proposal. I would strongly urge the Commission to continue to seek multiple sources of contemporary quotes for battery storage systems of appropriate size for PEI, to compare accurately against the proposal before us.

Elsewhere the transition away from thermal generation to renewable sources paired with batteries is moving forward at full tilt. In the United States, more than ninety per cent of new electricity generating capacity added since 2024 has been solar, wind and battery storage. Closer to home, Ontario’s Independent Electricity System Operator recently awarded contracts for the first new large-scale generation in over a decade - fourteen projects, and every single one of them went to battery storage.

Part of me wishes this were happening as a result of a widespread global awakening to the imminent existential threat of the climate emergency, but the truth is that those bids won in open competition because they represented the best value for money. Renewables paired with battery storage are now consistently the least-cost option around the world, and not just in capital expense but over the lifetime cost of the resources.

There is no reason that I have read or seen that puts our province in a unique position that would prevent Prince Edward Island from joining this energy transition. It is time for us to step up and make our contribution to this world-wide movement. Instead, we are here today fending off a backwards looking proposal from our utility that seems intent and content to stay with last century's model for power generation and distribution. And not only that, but the vehicle of choice to drive us in reverse is the ProEnergy PE6000.

I spoke at length about the concerns I have with the ProEnergy opportunity that is at the centre of the application. I consider it as so important that I shall reiterate much of what I said here. ProEnergy introduced the PE6000 unit in November 2023, less than three years ago. Although based on the General Electric LM6000, which has been in production since 1990, the PE6000 is an entirely different product. Unlike GE, an established global corporation with over three decades of experience with aeroderivative turbines, ProEnergy is a brand new player on the manufacturing side. Despite this extremely limited history and record of service, the promotional package included in the recently released materials, and which forms part of the exhibit from Maritime Electric, describes the solution on offer as one that "fills supply gaps in less than 10 minutes through all weather conditions based on field-proven engines that averaged 99% start reliability for 2024." Only on careful reading do you discover that these claims rest not on the PE6000 but on an entirely different model manufactured by GE - the LM6000, which has over 30 years of operational experience behind it. To suggest that these two are comparable or equivalent is at best inaccurate and at worst deliberately misleading.

I think it is fair and appropriate to cite comments made by Maritime Electric executives at PEI legislative standing committees, as even though outside the documents presented to this commission, they were comments made as witnesses to a legislative process that happened concurrently with the deliberations surrounding docket UE20742, and are on the public record through Hansard transcripts. I asked Angus Orford on Tuesday March 10th 2026 at a Legislative standing committee how many PE6000 units are in operation in climates similar to PEI's, and he could not answer the question. He was then asked whether he was confident they would operate in PEI's winter climate, to which he answered that he was 100 per cent confident. Here is a stark example of a "personal opinion and advocacy rather than evidence" being brought forward, of which I myself have been accused by the proponent.

Maritime Electric has now answered the original question on the record, and the answer is none. The company states that "currently, there are no PE6000 units operating in climates directly comparable to PEI," and that it is "not currently aware of any PE6000 units that have operated in climatic conditions directly comparable to the February 2023 polar vortex event." I take no satisfaction whatsoever in being right about this. I would very much rather have been told that there were fifty of them running happily through a Manitoba winter.

It is a singularly confounding purchase that we are being pressured to buy. I have tried to understand it in relation to us making the best decision we can for Islanders' energy future, and I simply cannot. It makes no sense - unless you are Maritime Electric acting out of self-interest.

We are asked to commit to an unproven machine, from a sole vendor against whom no one was invited to compete, at a price that has moved twice, arriving a year later than promised, carrying a one-year warranty, on a schedule whose central justification has evaporated, with the risks of tariffs being applied and stranding costs being assigned in advance to

ratepayers, on the strength of a plan six years old — and with the numbers that matter most withheld from the very people who will pay for all of it.

And the people paying the tab – Islanders – are living in difficult financial times, and many families have no extra money to go around. They care that when we make historic investments, especially in times of economic peril, that they and their children and grandchildren are getting value for money. They care deeply about the future of our province. They care that we do our bit to ensure a stable climate – something upon which all our province's primary industries depend. And they care that we will be able to look back 10, 20, or 50 years from now and feel proud of the decisions that were made; to feel like we are leaders, not laggards.

Thank you.

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