

September 13, 2021

The Island Regulatory & Appeals Commission
134 Kent Street, Suite 501
P.O. Box 577
Charlottetown, PE C1A 7L1

**Attention: Cheryl Mosher, CPA, CA
Senior Financial Advisor**

Dear Ms. Mosher:

**Re: Request for Intervention
Our File Reference No. 15042-215dk**

The City of Summerside ("COS") hereby formally requests to be recognized as an Intervener in UE 20945 – OATT Schedule Update 2021 – as filed by Maritime Electric Company, Limited ("MECL") on July 30, 2021 (the "Application").

Pursuant to the *Prince Edward Island Regulatory & Appeals Commission's Rules of Practice and Procedure*, we wish to confirm that the COS is seeking to have the status of an Added Party Intervener.

The COS is a user of the Prince Edward Island electricity transmission system, and therefore a rate payer under the existing Open Access Transmission Tariff ("OATT") and will be affected should the rate increases being requested in the Application be approved by the Commission. Any such increase will affect the COS and may also have implications for its customers as the COS is the only other provider of services in Prince Edward Island as defined in the *Electric Power Act*. As the only other provider of electrical services on Prince Edward Island, the interests of the COS in this matter are unique and distinct. Additionally, the rate increases being sought by MECL in the Application are significant to the overall users of the transmission system.

As an Added Party Intervener, the COS would expect to have full intervener status, which would, subject to the direction given by the Commission, include the right to:

- file interrogatories,
- file written submissions with the Commission,

- appear before the Commission,
- call witness, and
- cross-examine witness put forth by the Applicant (and other Interveners – if any).

The COS does not believe that its participation in the Application would add to the complexity of the issues to be considered therein, nor does it believe that the costs of its participation would represent a considerable increase to the overall costs of the proceedings given the rate increase being sought by MECL.

For all matters pertaining to the COS's submission to have Added Party Intervener status, please be advised that any correspondence may be directed to:

Derek Key, Q.C.
494 Granville St.
Summerside, PE
C1N 4K4
derek.key@keymurraylaw.com
902.436.4851

and

Ryan MacDonald
80 Grafton St.
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ryan.macdonald@keymurraylaw.com
902.368.7825

We trust that the foregoing is sufficient for the Commission to consider designating the COS as an Added Party Intervener in the Application, but should you have any questions or concerns, please do not hesitate to contact us at your convenience.

Yours truly,

KEY MURRAY LAW



Ryan P. MacDonald