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Interrogatories of Commission Staff

TO: Maritime Electric Company, Limited

FROM: Cheryl Mosher, Senior Financial Advisor

DATE: June 7, 2021

RE: Comprehensive Review of the Energy Cost Adjustment Mechanism

DOCKET: UE20603

The Island Regulatory and Appeals Commission (the "Commission"), in assessing the Comprehensive Review of the Energy Cost Adjustment Mechanism submitted by Maritime Electric Company, Limited ("Maritime Electric" or "MECL"), requests responses to the following interrogatories:

- 1. The Murphy Report filed in 2004 concluded that capacity costs should not properly be recovered through the ECAM. The Report stated that capacity costs are able to be reasonably forecast for inclusion in basic rates. However, MECL is proposing that capacity costs (namely account 7002 & account 7049) remain in the ECAM.
 - a. Please provide justification for continuing to recover capacity costs through the ECAM.
- 2. The Murphy Report concluded that volume fluctuations (i.e. costs for the volume of energy above the budget level) should not properly be recovered through the ECAM.
 - a. In light of the Murphy Report, please provide justification for continuing to recover volume fluctuations through the ECAM.
- With respect to Account 7415 MICF Government-Owned Miscellaneous Labour & Expense, the account description indicates that costs incurred in the maintenance of Government-owned facilities associated with the Maritime Interconnection are included in this account.
 - a. Please explain why this account cannot be appropriately budgeted and included in base rates.

b. Please provide further justification for the inclusion of this account in the ECAM.

Additional interrogatories may follow.

Cheryl Mosher, CA, CPA Senior Financial Advisor

Cheryl Mosher

Prince Edward Island Regulatory & Appeals Commission