

November 26, 2024

Via Electronic Mail (mwalshdoucette@irac.pe.ca)

Michelle Walsh-Doucette
Island Regulatory and Appeals Commission
National Bank Tower
134 Kent Street, 5th Floor
Charlottetown, PE C1A 8R8

Dear Ms. Walsh-Doucette:

**Re: LA24-018 – Claude Dorgan et al. v. Town of Tignish
Application to Intervene**

We write on behalf of the Maritime Electric Company, Limited (“Maritime Electric”).

Maritime Electric hereby applies to intervene, as an Added Party Intervener, in the above-captioned proceeding. Maritime Electric relies on Rules 14 to 16 of the Commission’s *Rules of Practice and Procedure*.

With respect to the factors listed in Rule 16:

- Distinct and substantial interest. Maritime Electric has a distinct and substantial interest in the proceeding. The purpose of the rezoning is to permit Maritime Electric to acquire the subject property for the future construction of a substation. Maritime Electric seeks to undertake the construction of this substation in furtherance of its unique statutory obligations under the *Electric Power Act*, RSPEI 1988, c E-4.
- Scope of intervention. Maritime Electric proposes to participate as a full party to the proceeding by, for example, leading evidence, challenging evidence led by other parties, and making submissions to assist the Commission in determining the questions in dispute.
- No undue addition to cost or complexity. Maritime Electric’s participation will not unduly prolong or complicate the appeal proceeding. To the contrary, Maritime Electric’s participation will help to clarify and elucidate the legal and factual issues in dispute. Maritime Electric participated in all aspects of the municipal rezoning process, including by delivering presentations at the public meetings. MECL is therefore well-positioned to speak to the evidence and arguments that were led or advanced before the underlying decision-maker.
- Proposed evidence. Maritime Electric plans to assist the Commission by leading evidence as to the sound planning principles and proper procedures that informed and support the underlying decision, and as to Maritime Electric’s proposed use for the subject property in furtherance of its statutory obligations.

4150-6462-8564

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All correspondence to Maritime Electric in relation to this Application, or to the proceeding more generally, may be directed to the undersigned at the following coordinates:

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65 Grafton Street
Charlottetown, PE C1A 1K8

Email: scampbell@stewartmckelvey.com
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We thank the Commission for its consideration of this Application.

Yours truly,

Stewart McKelvey



D. Spencer Campbell, K.C.*

DSC/dr

c. Claude Dorgan and Roma Dorgan (claude.dorgan@pei.sympatico.ca)
Jessica Dorgan Trail and Stephen Trail (stgotrail@gov.pe.ca)
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