



THE BRETON LAW GROUP

James R. Gogan
Direct Dial: 902-563-5920
Email: jim@bretonlawgroup.com

FILED BY ELECTRONIC TRANSMISSION

April 13, 2021

Island Regulatory and Appeals Commission
5th floor, Suite 501
National Bank Tower
134 Kent Street
Charlottetown, PEI

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

Dear Ms. Mosher:

Re: UE41400 / Order UE19-03 Prince Edward Island Energy Corporation Application for Approval of Electricity Efficiency & Conservation Plan- Extension to filing request

I am writing on behalf of Prince Edward Island Energy Corporation ("PEIEC") in relation to the Electricity Efficiency & Conservation Plan ("EE&C") which was filed with the Island Regulatory Appeals Commission ("IRAC") on June 29, 2018. Pursuant to the Order of the Commission, the Plan was effective as of the May 17, 2019 to remain in effect until March 31, 2021.

PEIEC is writing to update the Commission with respect to the status of development of its pending EE&C Plan which, was originally to be effective April 1, 2021. As the Commission is aware, PEIEC was instructed to engage consultants for the preparation of EE&C Potential Study. Engagement with respect to development of the Potential Study began immediately following the direction of the IRAC. The Corporation was anticipating that this Potential Study would have been received well in advance of the anticipated filing on the April 1, 2021 EE&C Plan. The EE&C Potential Study was primarily intended to inform the development of the 2021 EE&C Plan and future EE&C Plans.

Owing to the worldwide Covid 19 pandemic declaration, receipt of the final Potential Study was significantly delayed. The Potential Study was filed with the Commission on March 22, 2021. This delay in receipt of the Potential Study has now significantly impacted the timing of the development of the next EE&C Plan. PEIEC is now actively engaged in the preparation of this Plan, however, given the impact of delay of receipt of the Potential Study, and ongoing Covid -19 based operating limitations, it is not anticipated that the Plan will be available for filing until Q3, 2021.

The impact of this delay is twofold:

- 1) PEIEC will require an extension of time to complete preparation of the EE&C Plan; and
- 2) The Corporation is presently operating outside of an authorized and Commission approved EE&C Plan.

Accordingly, PEIEC respectfully requests:

- 1) Authorization to file its next EE&C Plan in Q3, 2021; and
- 2) Authorization to continue operating under the parameters of the May 17, 2019 approved EE&C Plan until the approval of the subsequent EE&C Plan by the Commission.

PEIEC acknowledges the potential inconvenience associated with this request. However, given the current operating restrictions associated with the ongoing Covid 19 pandemic, and the delay associated with the receipt of the 2021 EE&C Potential Study, these delays were largely unavoidable.

In its consideration of this request, should the Commission require additional information, or alternatively wish for PEIEC to prepare a supplemental interim arrangement covering the time period between April 1, 2021 and the anticipated approval of the next EE&C Plan, PEIEC would be pleased to respond to this request.

Respectfully submitted.

THE BRETON LAW GROUP

James R. Gogan

cc. Mike Proud, EfficiencyPEI
Kim Horrelt
Nicole McKenna, Commission Counsel
Summerside
MECL