



Application – Friend of the Commission Intervener

The Ecology Action Centre (EAC) is seeking intervenor status as a Friend of the Commission regarding Docket UE20742 – Supplemental Capital Budget Request for MECL's On-Island Capacity for Security of Supply Project.

EAC is a non-profit environmental charity based in Mi'kma'ki/Nova Scotia and founded in 1971. Our organization is credited with advocacy efforts which led to the creation of Canada's first energy efficiency utility – Efficiency Nova Scotia – and with Nova Scotia's first recycling program.

Although our advocacy efforts are primarily focused on Nova Scotia, our staff have been asked for comment by numerous media outlets regarding the various components of the supplemental capital budget request laid out in the application. The public interest issue that arises in this proceeding relates to the potential approval of a capital project which would include a 50 MW Combustion Turbine and a 90 MW Reciprocating Internal Combustion Engine (RICE) plant.

These projects have the potential to substantially increase Greenhouse Gas (GHG) emissions on the grid and could increase costs to ratepayers despite the existence of cheaper and more sustainable dispatchable capacity resources. As a public advocate on issues related to climate change and energy poverty in Atlantic Canada, we feel that our interests align with those of many ratepayers in Prince Edward Island, and our concerns about these issues in relation to the subject matter of the proceeding are substantial.

Our proposed submission would focus on alternative methods of increasing dispatchable capacity resources without investment in a Combustion Turbine and RICE plant. We feel that the consideration of alternative investments aimed at increasing the reliability and resiliency of the grid will represent a useful contribution to the resolution of the proceedings. Through written submissions to the Commission, we intend to question the necessity of the proposed capital expenditures. We believe our submission will differ from those of other parties.

We do not anticipate any increase to the cost and complexity of the proceeding as a result of our submission.

The facts we intend to present relate to alternatives to diesel peaker plants, including grid scale battery storage, overbuilding of wind energy assets, and additional demand response programs. These alternatives often have a lower Levelized Cost of Electricity (LCOE). Utility regulators in California and Arizona have recently rejected applications for peaker plants similar to the ones proposed by Maritime Electric, as alternatives to these plants can offer greater resource diversity, flexibility and cost efficiencies than reliance on the acquisition of large peaker plants.

Sincerely,



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