

December 18, 2024

Island Regulatory and Appeals Commission **PO Box 577** Charlottetown PE C1A 7L1

Dear Commissioners:

On-Island Capacity for Security of Supply Project

Please find enclosed five copies of a Supplemental Capital Budget Request Application for Maritime Electric's On-Island Capacity for Security of Supply Project ("Project"). The on-Island generating capacity as proposed in this application is required to serve the public interest of all customers.

Maritime Electric has experienced significant increases in customer load, driven by population growth and electrification over the past several years. This growth in customer load is outpacing the available generating capacity resources, resulting in a forecast capacity deficit of 156 megawatts ("MW") by 2033. Without additional generating capacity, it will become increasingly difficult to meet customer needs during peak load periods, exposing customers to health, safety and security of supply risks.

PEI's reliance on on-Island generating capacity is at an all-time low. In 2023, the amount of on-Island generating capacity was only 31 per cent of the peak customer load. This amount is projected to further drop to 17 per cent by 2033 without capacity additions. Additionally, the high reliance on off-Island generating capacity purchases is becoming problematic due to limitations of the subsea cables and mainland transmission system, and concerns about potential generating capacity shortages in Atlantic Canada. Other electric utilities in Atlantic Canada are planning to install fast-acting generation similar to Maritime Electric's proposed Project.

To address the Company's forecast generating capacity deficit, the proposed Project includes the installation of 150 MW of on-Island capacity through a battery energy storage system, combustion turbine and reciprocating internal combustion engine plant. The Project will increase the amount of on-Island dispatchable generating capacity to approximately 50 per cent, supporting a more secure power supply for PEI, and is forecast to provide savings of approximately 20 per cent over purchasing off-Island capacity resources. By adding new on-Island capacity, Maritime Electric can mitigate the risks associated with regional capacity shortfalls and transmission constraints.

Maritime Electric's preliminary cost estimate for the Project of \$427 million (in 2024 dollars) requires further engineering to provide greater confidence in costing. As such, the Company expects that a capital expenditure deferral of up to \$12 million, or approximately 3 per cent, of the estimated Project cost will be required to complete upfront engineering and undertake a request for proposal ("RFP") process while the application is being reviewed by the Commission. Once proposals are received through the RFP process, the Company will be in a position to submit a report to the Commission with updated cost estimates, prior to awarding a contract for the Project.

Maritime Electric is working with Commission staff to schedule an in-person technical session with the Commission early in the regulatory process to discuss the urgent need for additional on-Island capacity. This session will assist the Commission in evaluating the necessity of the Project and understanding the immediate need for the Company's proposed deferral of up to \$12 million. This is crucial to ensure that the Project can proceed on schedule and address the forecast capacity deficit in a timely manner.

An electronic copy will follow.

Yours truly,

MARITIME ELECTRIC

Jason Roberts President and Chief Executive Officer

JCR14 Enclosure

C A N A D A

PROVINCE OF PRINCE EDWARD ISLAND

BEFORE THE ISLAND REGULATORY AND APPEALS COMMISSION

IN THE MATTER of Section 17(1) of the *Electric Power Act* (R.S.P.E.I. 1988, Cap. E-4) and **IN THE MATTER** of the Application of Maritime Electric Company, Limited for the approval of a 2024 Supplemental Capital Budget Request for the On-Island Capacity for Security of Supply Project.

APPLICATION AND EVIDENCE OF MARITIME ELECTRIC COMPANY, LIMITED

December 18, 2024

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Maritime Electric - On-Island Capacity for Security of Supply Project December 18, 2024

Solicitors for Maritime Electric Company, Limited

3.0 EXECUTIVE SUMMARY

Growing Capacity Deficits

 In recent years, Maritime Electric Company, Limited ("Maritime Electric" or the "Company") has experienced rapid customer load growth due to increases in Prince Edward Island's ("PEI") population and electrification. Since 2005, PEI has experienced load growth that is over five times the Canadian average and is the highest of the Atlantic Canadian provinces. Maritime Electric's highest recorded peak customer load (also referred to as system peak) of 359 megawatts ("MW") occurred in February 2023, during a polar vortex weather event, and was almost 60 per cent 10 higher than the Company's 2014 peak customer load of 226 MW, only 10 years ago[.](#page-11-1)¹

 Despite customer load increasing, the Company's power generating resources (also referred to as generating capacity resources or capacity resources) located on PEI are now significantly less than they were a decade ago. With the retirement and decommissioning of the Charlottetown Steam Plant, the Company's on-Island power generating resources decreased from 144 MW in 2015 to 89 MW presently. This reduction has been offset by an increase in off-Island power generating capacity purchases (also referred to as off-Island capacity purchases) from New Brunswick Power Corporation ("NB Power"), but there are limits to the amount of off-Island capacity that can be imported to PEI, and the Company is nearing those limits.

 Maritime Electric's growing customer load and limited on-Island power generating resources are forecast to result in power generating capacity deficits during peak customer load periods, as shown in Figure 1. Because of transmission constraints in New Brunswick and concerns about potential power generating shortages in Atlantic Canada, additional power generating resources are required on PEI to address the growing power generating capacity deficit and avoid possible customer load interruptions (i.e., rotating outages) due to insufficient generating capacity.

The system peak of 359 MW was the Maritime Electric load only, it does not include the City of Summerside load. The PEI system peak, including the City of Summerside was 396 MW.

1

2 Maritime Electric engaged Sargent & Lundy LLC ("S&L") to complete a Capacity Resource Study "CRS") in 2022 and a subsequent addendum in 2023, which evaluated options to address the 4 Company's forecast power generating capacity deficit[.](#page-12-1)³ The CRS evaluated several power generating options, including combustion turbines ("CT"), reciprocating internal combustion engines ("RICE"), onshore wind, solar, battery energy storage systems ("BESS"), small modular nuclear reactors ("SMR") and offshore wind. The CRS recommended the addition of 125 to 150 MW of on-Island power generating resources through a combination of CT, RICE and BESS resources.

10

11 *Proposed Project*

12 Maritime Electric is seeking Commission approval of this supplemental capital budget request

13 application (the "Application") for its On-Island Capacity for Security of Supply Project (the

14 "Project"), which includes three components:

³ References to content from the CRS within this Application refer to both the original CRS and the subsequent addendum. Any references to recommendations reflect the updated recommendations provided in the Addendum.

² NB Power capacity purchases are based on existing levels in the Energy Purchase Agreement with NB Power.

 1. **Battery Energy Storage System:** Installation of a 10 MW/40 megawatt-hours ("MWh") BESS. This will provide 10 MW of backup capacity for four hours to supply customer load or the transmission system.

 2. **Combustion Turbine:** Installation of a 50 MW Combustion Turbine ("CT4") adjacent to the existing Combustion Turbine No. 3 ("CT3") at the Charlottetown Generating Station ("CGS"). Initially, CT4 will be diesel-fired, but can be retrofitted for natural gas, biodiesel or other lower carbon fuel options. It will also be equipped for synchronous condenser operation for critical grid support services.

- 3. **Reciprocating Internal Combustion Engines:** Installation of a RICE plant on PEI comprised of five RICE units, each rated at 18 MW, totaling 90 MW. The RICE units will also be diesel-fired initially, but can operate on various fuels, including diesel, biodiesel, natural gas, hydrogen and ammonia, in the future.
-

 The three Project components will be operated in a peaking and backup supply role, similar to Maritime Electric's existing CTs.

 Based on an AACE Class 4/5 cost estimate provided by S&L, the total cost of the Project is anticipated to be \$427 million, with the expected accuracy within 30 per cent. The cost estimate is based on 2024 costs and does not include inflation or cost changes due to market dynamics between 2024 and the time of construction. Maritime Electric will initially expend up to \$12 million to complete upfront engineering design work and issue request for proposals ("RFP") for the Project, at which point more accurate cost estimates will be provided to the Commission. The \$12 23 million represents approximately 3 per cent of the estimated project cost of \$[4](#page-13-0)27 million.⁴

 The Project is expected to provide a total of 150 MW of on-Island power generating resources, which will reduce Maritime Electric's dependence on off-Island power generating resources and avoid their associated costs. A 2024 net present value ("NPV") analysis that compares the costs and avoided costs of the Project determined that, over the useful life of the Project components, the Project results in a positive economic benefit to customers. Overall, the Project is estimated

The \$12 million allocated for upfront engineering is part of the total estimated project cost of \$427 million and is not an additional expense.

 to provide savings of approximately 20 per cent compared to purchasing off-Island power 2 generating capacity resources.

Project Benefits

 The Project will provide 150 MW of additional on-Island power generating resources that will address Maritime Electric's forecasted growing power generating capacity deficit. Figure 2 shows an updated power generating capacity forecast with the addition of the proposed new on-Island power generating resources, which phases out the deficit by 2031.

11 In recent years, the Company has relied on NB Power for an increasing amount of off-Island power generating capacity purchases to satisfy its requirements. However, the Company's ability to acquire additional off-Island power generating capacity is subject to limitations of the New Brunswick ("NB") transmission system and the NB-PEI Interconnection ("Interconnection"), and the availability of off-Island power generating capacity. The benefits of the proposed on-Island power generating resources include:

⁵ NB Power capacity purchases are based on existing levels in the Energy Purchase Agreement with NB Power.

- **■** An estimated savings of approximately 20 per cent over the useful life of the Project components compared to purchasing off-Island power generating capacity;
- mitigated risk of off-Island power generating capacity shortages and cost increases as demand for capacity increases in the Atlantic Canada region;
- ability to serve more customer load during significant curtailment events or disconnections from the mainland;
- support of additional renewable energy resource development on PEI by providing renewable backup power support;
- reduced risk to personal health, safety and property damage due to power generating capacity shortages during cold weather events; and
- **·** increased system stability, strength and reliability across PEI, especially during periods of high customer load and transmission system outages.
-

Greenhouse Gas Emissions

 Maritime Electric's greenhouse gas ("GHG") emissions due to the operation of its on-Island power generating resources (i.e., CTs) in 2023 was 3,036 tonnes, or an estimated 0.2 per cent of PEI's total 2023 emissions, as shown in Figure 3. Although the use of Maritime Electric's on-Island power generating resources is forecast to increase, the associated GHG emissions are expected to contribute only approximately 1 per cent to the Government of Prince Edward Island's ("Province") 2030 target emission levels.

Conclusion

 Additional on-Island power generating resources are required to ensure Maritime Electric can meet its power generating capacity requirements and supply customer load during peak periods. The Project is part of a balanced approach to meeting Maritime Electric's power generating capacity requirements in the face of uncertainty regarding the availability and cost of off-Island power generating capacity in the future. The Project mitigates some of this uncertainty by providing an additional 150 MW of on-Island power generating resources that will be used in a standby role and to support further integration of wind and solar energy resources on PEI. Maritime Electric will continue to rely on off-Island power generating capacity for approximately 50 per cent of its total power generating capacity requirements.

 Maritime Electric is seeking Commission approval of the need for the Project and a capital expenditure deferral of up to \$12 million of the total Project cost to complete upfront engineering work and an RFP process. The Company proposes to submit a report to the Commission with updated cost estimates once proposals are received through the RFP process, prior to awarding contracts for the Project.

4.0 INTRODUCTION

 Maritime Electric requires additional dispatchable generating capacity resources located on PEI. This Application describes the Company's plan to address this need.

 The Application is structured to provide a clear and thorough understanding of the Project. Section 5.0 includes essential information to provide background and context concerning the current state of electricity on PEI. Section 6.0 provides details of the Project and outlines the technical and logistical elements and the estimated costs of the Project's components. Section 7.0 describes the critical need for additional dispatchable capacity resources and highlights the factors driving this necessity. Section 8.0 outlines the alternatives evaluated and a rationale for the Project. Section 9.0 discusses the GHG emission impacts of the Project and considers environmental regulatory requirements. Section 10.0 presents an analysis of the anticipated impact on the Company's rate base, revenue requirement and customer rates. Finally, Section 11.0 includes a proposed order for the Project.

 Through the Project, Maritime Electric will install additional on-Island dispatchable capacity resources ensuring a reliable and secure supply of electricity for customers.

4.1 Corporate Profile

 Maritime Electric owns and operates a fully integrated power system providing for the purchase, generation, transmission, distribution, and sale of electricity throughout PEI. The Company's head office is located in Charlottetown with generating facilities in Charlottetown and Borden-Carleton.

 Maritime Electric is the primary electric utility on PEI delivering approximately 90 per cent of PEI's supply of electricity. To meet the electricity needs of its customers, the Company has contractual entitlement to capacity and energy from NB Power's Point Lepreau Nuclear Generating Station ("Point Lepreau") and an agreement for the purchase of capacity and system energy from NB Power delivered via four subsea cables owned by the Province. Through various contracts with the PEI Energy Corporation ("PEIEC"), the Company purchases the capacity and energy from 92 MW of wind generation and the energy from 10 MW of solar generation located on PEI. In the event that the wind or solar generation fails to provide the energy expected through these

- contracts, the shortfall is obtained through additional energy purchases from NB Power or by operating the Company's CTs, which provide 89 MW of on-Island backup generation.
-

 Maritime Electric is a public utility subject to PEI's *Electric Power Act*. As a public utility, the Company is subject to regulatory oversight and approvals of the Island Regulatory and Approvals Commission ("IRAC" or the "Commission"), which has jurisdiction to regulate public utilities under the *Electric Power Act* and the *Island Regulatory and Appeals Commission Act*.

4.2 Purpose

 Maritime Electric has experienced significant customer load growth in recent years, driven by increasing population on PEI and the transition from fossil fuel energy sources to electricity (i.e., electrification). Consequently, the Company forecasts a capacity resource deficit as early as 2025, as detailed in Section 5.4.

 To address this forecasted deficit, Maritime Electric submits this Application seeking approval for the Project and a capital expenditure deferral of up to \$12 million to complete upfront engineering work and issue RFPs for the Project. The Project will ensure the Company meets its legislated responsibility to operate and maintain a reliable power system under changing conditions and 19 manage increased electricity usage effectively[.](#page-18-1)⁶

The Project includes:

 1. **Battery Energy Storage System:** Installation of a 10 MW/40 MWh BESS, which will provide backup for customer load, the transmission system, or on-Island renewable generators. The BESS will also be used to help meet the Company's ancillary service and capacity requirements, reducing the amount of these products currently purchased from NB Power.

 2. **Combustion Turbine:** Installation of a 50 MW CT (i.e., CT4) adjacent to the existing CT3 at the CGS. This location will limit the incremental capital and operational costs by sharing ancillary equipment between CT3 and CT4. Initially, CT4 will be diesel-fired, but can be

As per Section 3 of the *Electric Power Act*.

retrofitted for natural gas, biodiesel or other lower carbon fuel options. It will also be equipped for synchronous condenser operation for critical grid support services.

 3. **Reciprocating Internal Combustion Engines:** Installation of a RICE plant on PEI that will have five RICE units, each rated at 18 MW, for a total of 90 MW. Initially, the RICE units will also be diesel-fired, but can operate on various fuels, including diesel, biodiesel, natural gas, hydrogen and ammonia, in the future.

 In total, the Project will add 150 MW of on-Island dispatchable capacity resources, capable of 9 supplying electricity to approximately 42,900 homes during system peak periods.^{[7](#page-19-0)} This capacity will primarily serve as peaking and backup capacity for responding to unplanned system events, 11 hold-to-schedule directives from NB Power and facilitating planned maintenance activitie[s.](#page-19-1)⁸ The Project will reduce the need for off-Island capacity purchases, which is expected to provide overall savings of approximately 20 per cent over its useful life. The project is also expected to support additional renewable energy resource development on PEI and enhance the reliability and security of electricity supply to customers.

 The reliability and security of supply benefits of installing capacity locally, coupled with the need to upgrade the NB transmission system and the Interconnection to enable more off-Island capacity purchases, makes the Project the best option to meet the Company's growing capacity requirements.

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Estimated number of homes is based on an average of 3.5 kW per home during peak customer load periods.

Hold-to-schedule refers to times when Maritime Electric is required to generate electricity due to a sudden change in energy import requirements that cannot be fulfilled by NB Power. Hold-to-schedule events are typically attributed to rapid changes in renewable production. Further information on hold-to-schedule events can be found in Section 7.3.

5.0 BACKGROUND

 Maritime Electric is responsible for supplying three critical functions related to electricity generation: (1) energy; (2) capacity; and (3) ancillary services.

 Energy is the amount of electricity that must be delivered by an electrical system to meet a customer's electricity needs over a period of time (e.g., over a month) and is measured in kilowatt-7 hours ("kWh").^{[9](#page-20-2)} Capacity is the maximum amount of electricity that the electrical system can supply to meet a customer's electricity needs at any given time (i.e., instantaneously) and is 9 measured in kilowatts ("kW").^{[10](#page-20-3)} Ancillary services refer to the functions that help system operators maintain proper flow and direction of electricity, address imbalances between energy supply and customer load, maintain system voltage and frequency within acceptable limits, and help the system recover after a system event.

5.1 Overview of Electrical System

 Maritime Electric operates a fully integrated electrical system on PEI. Figure 4 illustrates the four primary elements of the Company's electrical system:

-
- A. Supply The Company sources energy and capacity from a variety of generating sources, including NB Power, wind and solar generators and the Company's CTs.
- B. Transmission The sourced electrical energy is transported through the Company's transmission system at high voltage levels (i.e., 69 kilovolts ("kV") or higher) to distribution substations.[11](#page-20-4)
- C. Distribution The voltage of the electrical energy is reduced to lower voltage levels (i.e., typically between 12 and 25 kV) through distribution substations and transported to customers through the distribution system.
- D. Consumption The voltage of the electrical energy is reduced to customer voltage levels (i.e., typically between 120 and 600 volts) before being delivered to customers for consumption.

¹ kWh is equal to 1,000 watt-hours (Wh).

1 kW is equal to 1,000 watts (W).

^{11 1} kV is equal to 1,000 volts (V) .

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This Application is focused on addressing the needs of Maritime Electric's supply of capacity.

5.1.1 Energy and Capacity Supply

 Energy requirements fluctuate throughout the day as customers' needs change, whereas the electrical system's capacity is fixed and based on its physical limitations. One way of thinking about energy and capacity is to consider the example of filling a bathtub with water: energy is comparable to the amount of water collected in the bathtub over a period of time, and capacity is comparable to the size of the bathtub's faucet or the maximum amount of water that can flow into the bathtub at any given time. If the bathtub's faucet cannot deliver the required amount of water, the faucet's size (i.e., capacity) must be increased.

The amount of capacity that an electrical system needs is determined by its system peak (i.e.,

when the instantaneous collective load of all customers is highest). The Company's system peak

typically occurs in January or February between 5 p.m. and 6 p.m., a time when customers are

 returning home on a cold weekday after sundown. Maritime Electric must ensure that it has access to sufficient capacity resources (i.e., sources of power generation) to supply its customers during 3 the system peak without interruption.^{[12](#page-22-0)}

 Prior to the installation of two subsea cables to establish the Interconnection between NB and PEI in 1977, PEI relied on imported heavy fuel oil ("Bunker C") and diesel to generate electricity. At the time, Maritime Electric operated steam turbines at its CGS and CTs at its Borden-Carleton Generating Station ("BGS"), which supplied all the customers' energy and capacity requirements. The establishment of the Interconnection provided access to lower-cost energy sources located on the mainland; therefore, Maritime Electric's on-Island generating resources began operating primarily in a peaking and backup supply role.

 The Company commissioned its newest on-Island dispatchable generating resource (CT3) in 14 2005 at the CGS to ensure the Company maintained an adequate level of planning reserves.^{[13](#page-22-1)} At 15 the time, the Interconnection had a 100 MW firm transfer capacity limit,^{[14](#page-22-2)} and the capacity available through the Interconnection and the existing on-Island generating resources was 17 insufficient to meet the Company's expected system peak.^{[15](#page-22-3)}

 Around the same time, advances in renewable energy generation technology enabled PEI to begin developing wind energy. This new development allowed Maritime Electric to source a portion of its energy from on-Island resources. The Interconnection continued to supply most of the Company's energy needs, supplemented by on-Island wind energy (when available) and Maritime Electric's on-Island dispatchable generation (when required). As customer load continued to grow, the Interconnection's ability to sustain PEI's energy needs diminished. As a result, either the capacity of the Interconnection needed to be expanded or additional on-Island

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As legislated by Section 3(a) of the *Electric Power Act*.

¹³ CT3 was approved by the Commission in August 2004 in Order UE04-01. CT3 is not only Maritime Electric's newest dispatchable generating unit, but also the last dispatchable generating unit installed in the Maritime Provinces.

¹⁴ During this period only two cables (Cables 1 and 2) were in service, and the 100 MW firm capacity transfer limit was based on the N-1 criterion of the loss of one cable.

¹⁵ The net present value ("NPV") calculation showed that installing a third cable and procuring capacity from off-Island was more costly than installing CT3.

1 dispatchable generating capacity resources were needed, despite further development of wind 2 energy resources on PEI.^{[16](#page-23-1)}

3

 In 2017, two additional subsea cables (i.e., cables 3 and 4) were installed, which increased the 5 combined physical capacity of the four subsea cables to 560 MW.^{[17](#page-23-2)} Around this time, NB Power and Maritime Electric completed upgrades to their transmission systems, which increased the 7 maximum import capacity across the Interconnection to 300 MW.^{[18](#page-23-3)} The significant increase in the capacity transfer limit from NB Power, combined with the availability of excess generating capacity in NB at that time, allowed Maritime Electric to replace the generating capacity associated with the Charlottetown Steam Plant, which had reached end of life, with off-Island capacity 11 purchases.^{[19](#page-23-4)}

12

 Over the past two decades, renewable energy generation has increased dramatically on PEI, but Maritime Electric's main energy supply continues to be from off-Island resources via the Interconnection. The Company's on-Island dispatchable generation is used primarily in a peaking and backup role and, as such, contributed only 0.2 per cent of the Company's energy supply in 17 2023.

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19 **5.1.2 Existing Capacity Resources**

20 Maritime Electric meets its current energy and capacity requirements with a combination of on-

21 and off-Island generating resources. This combination of resources provides a diverse mix that

22 provides reliability and a degree of price stability for customers. Figure 5 shows a breakdown of

23 Maritime Electric's energy and capacity resources in 2023. The breakdown shows that, while the

¹⁶ On June 15, 2015, Maritime Electric applied for an additional combustion turbine to be added at the CGS. Maritime Electric did not proceed with the installation of this CT, instead it shifted its focus towards expanding the Interconnection, which had received Federal funding and was being pursued by the Government of PEI.

¹⁷ Although the physical capacity of the four subsea cables is 560 MW, the Interconnection capacity is limited to 300 MW. Coincidentally, PEI's import limit is also restricted to 300 MW by the capability of the NB transmission system, which is due to congestion on the transmission system in the South-Eastern region of New Brunswick and a limit to available reactive power sources. This limitation is discussed further in Section 7.2.2.

¹⁸ The import capacity was as low as 80 MW but was increased to 240 MW following modifications on the NB transmission system. This was quickly increased to 300 MW following transmission upgrades that were completed on PEI. This import capacity is shared between Maritime Electric (270 MW) and the City of Summerside (30 MW).

¹⁹ The Charlottetown Steam Plant, which peaked at 60 MW of generating capacity, had reached end of life with units that were 50 to 70 years old. The Steam Plant also did not suit Maritime Electric's current mode of operation as it was slow to come online (i.e., requiring 12 to 24 hours as opposed to 10 minutes for CTs) and was expensive to keep in standby mode due to a requirement to have boiler operators onsite 24/7 while the plant was in standby mode.

 same physical resources can be used to meet both energy and capacity requirements, the characteristics of the resource dictates the way each resource is apportioned to energy and capacity. For example, while energy from utility-scale wind turbines provided approximately 12.8 per cent of Maritime Electric's energy needs in 2023, wind turbines supplied only 7.0 per cent of the 2023 capacity requirement. Wind turbines are not dispatchable, meaning they cannot be relied upon to operate on demand when required. In contrast, Maritime Electric owns three CT generators that are dispatchable, meaning they can be started and their output adjusted remotely by system operators at any time. CT availability during system peak is predictable and, as such, 9 they provided 28.3 per cent (89 MW) of the [20](#page-24-0)23 capacity requirement.²⁰ However, because the \degree CTs are seldomly operated, they supplied only 0.2 per cent of the energy needs in 2023.^{[21](#page-24-1)} This section provides an overview of the energy and capacity resources shown in the Figure.

12

13

14 *Point Lepreau*

- 15 Maritime Electric is party to a Unit Participation Agreement with Point Lepreau.^{[22](#page-24-2)} The Company's
- 16 participation share is 4.5 per cent (i.e., 30 MW of the total 660 MW output), resulting in 29 MW of

²⁰ In 2023 Maritime Electric's on-Island dispatchable generation provided 89 MW of the Company's total capacity firm resources of 314 MW.

²¹ In 2023 Maritime Electric's on-Island dispatchable generation provided 2,509 MWh (gross generation) of energy towards to Company's total energy requirement of 1,590,379 MWh.

²² The Unit Participation Agreement is essentially a proxy to ownership.

 capacity, net of transmission losses, delivered to the Interconnection. This means that Maritime Electric receives 29 MWh of energy for every hour that Point Lepreau is operational, and therefore provides 29 MW of capacity towards the Company's capacity requirement. The Unit Participation 4 Agreement is for the life of the plant, which is expected to be decommissioned in 2039.^{[23](#page-25-0)} 5 *NB Power Purchases* NB Power purchases are secured by the Company through an Energy Purchase Agreement 8 ("EPA"). The current EPA was executed in March 2019 and expires on December 31, 2026.^{[24](#page-25-1)} The EPA includes the purchase of: 10 **·** Firm and non-firm energy; 12 • Firm capacity;^{[25](#page-25-2)} **· Capacity-based ancillary services; and ·** Transmission service in NB necessary to deliver these products. 15 All products included in the EPA, except non-firm energy, are capacity-backed, meaning that NB Power cannot limit or curtail product delivery to the Company, as outlined in the EPA, without 18 curtailing its own customer load proportionally.^{[26](#page-25-3)} Non-firm energy is backed by Maritime Electric's 19 CTs and can be curtailed by NB Power with appropriate notification.^{[27](#page-25-4)} When curtailment occurs, the Company either supplies the energy from its own CTs or sources additional energy from Nova Scotia Power Incorporated ("NS Power").

22

23 Maritime Electric fulfills most of its capacity requirement through the EPA, which specifies an 24 annual allotment of firm capacity. The EPA specified allotment of firm capacity is 180 MW, 25 185 MW and 190 MW for the calendar years 2024, 2025 and 2026, respectively.^{[28](#page-25-5)} NB Power

²³ The year 2039 is 27 years from the completion of the life extension refurbishment in 2012.
²⁴ The original EDA was act to terminate an Eshruany 20, 2024 but was ovtanded until Decem

²⁴ The original EPA was set to terminate on February 29, 2024 but was extended until December 31, 2026 through an amending agreement executed on October 22, 2020.

²⁵ Firm capacity refers to the certainty or order of scheduling with the System Operator. Firm capacity is the last product to be curtailed or shed, it is treated like native NB load. In contrast, non-firm capacity is less certain and would be curtailed or shed completely before firm capacity is impacted.

²⁶ This is true during normal conditions; however, the NB Power Transmission System Operator follows the North American Electric Reliability Corporation ("NERC") Standard EOP-011-2 which states that, under an Energy Emergency Alert Level 2 or higher, energy supply can be restricted as required to maintain the health of the overall system.

²⁷ Non-firm energy is also typically less expensive than firm energy because it is interruptible.
²⁸ These elletments are becad on a farecent that was developed in 2020.

²⁸ These allotments are based on a forecast that was developed in 2020.

 supplies this capacity from its own generating resources and through capacity purchases from third parties (e.g., neighbouring electric utilities).

 Recently, Maritime Electric's contracted allotments of firm capacity from NB Power were insufficient to meet the Company's capacity requirements due to higher-than-expected system peak growth. To date, NB Power has had excess capacity available and has allowed the Company to purchase additional capacity, on a short-term basis, to meet the Company's capacity 8 requirements.^{[29](#page-26-0)} However, NB Power indicated that, without the addition of new capacity resources, it too expects to be capacity deficient within five years. NB Power indicated that it intends to continue providing firm-capacity to Maritime Electric in the future but cannot guarantee what level of capacity will be available. As such, NB Power's ability to continue to increase its firm 12 capacity allowances to Maritime Electric is unclear.^{[30](#page-26-1)}

 Maritime Electric also purchases ancillary services from NB Power on an ongoing basis to fulfill the Company's generation reliability obligations. Ancillary service requirements can vary slightly but, generally, Maritime Electric must supply or secure the following ancillary services:

■ 1.7 MW of frequency regulation;

■ 4.7 MW of load following;

▪ 7.8 MW of spinning reserve;

• 19.7 MW of supplemental reserve (i.e., 10-minutes); and

· 16.2 MW of supplemental reserve (i.e., 30-minutes).

 As the Company's CTs are used for peaking and backup supply purposes (i.e., they are typically not running), they cannot be used to fulfill the Company's frequency regulation (1.7 MW), load following (4.7 MW) or spinning reserve (7.8 MW) requirements. To fulfill these requirements, generators must be operating (i.e., running) and not fully loaded, or they must be fast acting such

²⁹ Short-term capacity is purchased on a monthly basis. The Maritime Electric System Operator estimates what the next month's load will be based on the month-ahead weather and load forecast. If the Maritime Electric System Operator is projecting a load above the Company's contractual capacity, then a request is sent to New Brunswick Energy and Marketing Corporation asking whether additional short-term capacity is available for purchase. To date the Corporation has been able to meet Maritime Electric requests for short-term capacity.

 For the purposes of this Application, Maritime Electric has assumed that NB Power can continue to provide the 2026 allotment of 190 MW of firm capacity beyond 2026 but that no additional firm or short-term capacity will be available.

1 as a BESS. The Company uses its existing CTs to fulfill its supplemental reserve requirements 2 when possible. 31

3

4 *Wind Energy*

 Maritime Electric has power purchase agreements ("PPAs") with the PEIEC to purchase the energy output from a total of 92 MW of utility-scale wind farms. Also, a small number of net metered customers provide wind energy. Per the *Renewable Energy Act*, the Company must 8 accept and credit full retail value for all excess generation from net-metered generators.^{[32](#page-27-1)} A list of on-Island wind energy resources and their size is shown in Table 1. In 2023, wind energy accounted for 12.8 per cent of the Company's total energy supply.

11

12 a. Hermanville was initially developed as a 30 MW wind farm but has had significant operational issues that reduced
13 its capacity for a number of years. Repairs were completed in 2023 and 2024 and 9 of 10 turbines are its capacity for a number of years. Repairs were completed in 2023 and 2024 and 9 of 10 turbines are now at or near full capacity, thereby bringing its total capacity to approximately 27 MW. The 10th turbine was removed from service in 2024.

16 b. Although Maritime Electric does not purchase energy output from the West Cape or City of Summerside wind
17 farms, they are listed here as they do contribute towards the Company's renewable balancing and operation du 17 farms, they are listed here as they do contribute towards the Company's renewable balancing and operation during curtailments.

Maritime Electric's existing CTs are also required to provide capacity during winter months, and the same resource cannot count as both capacity and an ancillary service at the same time. The Maritime Electric System Operator assigns the Company's CTs to the best suitable service on a month-to-month basis. When required, Maritime Electric purchases its supplemental reserve requirements from NB Power.

³² Full retail value includes both the cost of energy, and most delivery charges associated with system infrastructure and energy control centre costs.

 The Province intends to increase the amount of wind energy generation under contract with Maritime Electric. PEIEC's Eastern Kings Phase II, a 30 MW Wind Plant expansion which is currently under construction is an example of working towards this goal. The Company has also received several requests from private wind energy developers looking to connect facilities to the Company's transmission system. Table 2 shows the current list of wind energy projects requesting connection to Maritime Electric's system.

7

8

 The expected development of additional wind energy projects on PEI will increase the Company's supply of renewable energy, which will support the Province's Net Zero emission targets. The new wind energy projects may provide Maritime Electric with fixed energy prices through long- term PPAs, and this will help stabilize energy costs and protect customers from energy market 13 price increases in the region.^{[34](#page-28-1)} The Provincial Government's *Renewable Energy Act* will establish 14 the rate for the energy produced.

15

 One of the challenges associated with wind energy resources is their intermittent nature, which means that their output at any given time is unpredictable and dependent on wind speed. Therefore, wind energy cannot supply all the Company's energy needs. Figure 6 shows a comparison of the actual wind generation to Maritime Electric's hourly customer load for a period in October 2023, and indicates that wind generation during the period, in addition to energy

³³ Projects are numbered to provide a total number of renewable projects requesting to connect to Maritime Electric's transmission system.

³⁴ All large-scale wind energy currently purchased by Maritime Electric is secured at the legislated minimum purchase price. This price is primarily fixed with only a portion being escalated each year based on the Canadian Consumer Price Index. The Renewable Energy Act Minimum Purchase Price Regulations can be found here: [https://www.princeedwardisland.ca/sites/default/files/legislation/R%2612-1-2-](https://www.princeedwardisland.ca/sites/default/files/legislation/R%2612-1-2-Renewable%20Energy%20Act%20Minimum%20Purchase%20Price%20Regulations.pdf) [Renewable%20Energy%20Act%20Minimum%20Purchase%20Price%20Regulations.pdf](https://www.princeedwardisland.ca/sites/default/files/legislation/R%2612-1-2-Renewable%20Energy%20Act%20Minimum%20Purchase%20Price%20Regulations.pdf) – Renewable Energy Act Minimum Purchase Price Regulations.

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1 supplied from Point Lepreau, remained below the hourly customer load. The Figure also demonstrates the intermittent nature of wind energy, with periods of high wind generation and periods of no wind generation (i.e., periods circled in red). The space between the existing wind generation and the hourly customer load is currently filled by NB Power energy purchases supplied through the Interconnection.

 Figure 7 shows the expected wind energy generation and hourly customer load for the same period in 2028 based on the wind speeds and hourly customer load experienced in 2023, assuming that all wind energy projects in Table 2 are operational. In this scenario, the new wind generation helps supply more of Maritime Electric's hourly customer load; however, periods with no expected wind generation remain, and this energy must be supplied by other sources. Today the Company sources energy from NB Power through the Interconnection when on-Island renewable energy generation is incapable of meeting customer load requirements. As electricity

³⁵ The nature of the Participation Agreement for Point Lepreau means that this energy cannot be scheduled. During operational hours of the plant Maritime Electric's portion of the energy is supplied to the Company. If Maritime Electric cannot accept the energy supplied, there is no credit. Therefore, the energy associated with the 29 MW capacity contracted with Point Lepreau is always included at the bottom of energy supply charts; it is considered baseload generation.

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1 loads increase throughout the region, NB Power and the Interconnection may not be capable of 2 meeting customer load during system peak periods.

3

4

5 Additionally, Figure 7 demonstrates an expectation that sometimes wind generation will exceed 6 the hourly customer load (i.e., period circled in green), in which case the excess wind energy must 7 be stored, exported to off-Island markets or curtailed. 36

8

 Due to the intermittency of wind energy generation, only a portion of the wind turbine generators' nameplate capacity can be counted towards Maritime Electric's capacity requirements. The portion that can be counted as capacity is called the effective load carrying capability ("ELCC"), which is calculated using a probabilistic loss of load expectation ("LOLE") analysis for local wind 13 energy.^{[37](#page-30-1)} Based on historical wind energy generation levels observed on PEI, the ELCC of

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With respect to stored energy, Maritime Electric currently has no means to store significant amounts. With respect to exported energy, there are currently no contracts in place to allow the sale of energy from Maritime Electric to NB Power. Curtailed energy refers to energy that the wind plant could have generated but was instructed to reduce production due to restrictions.

³⁷ LOLE is a common methodology used in the electric utility industry to determine the probability of a specific generator being unavailable during the system peak.

 Maritime Electric's current wind energy purchases is 22.6 MW (i.e., 24.6 per cent of the 92 MW 2 of wind energy currently purchased by the Company).^{[38](#page-31-0)} Figure 8 shows a plot of the ELCC of wind energy generation at various levels of nameplate capacity. The Figure illustrates that the percentage of installed nameplate capacity that can be counted towards the Company's capacity requirement reduces as more wind energy is added. For example, PEIEC is planning to add 30 MW of wind energy in 2025 that would increase the total wind nameplate capacity under contract with Maritime Electric to 122 MW (i.e., 92 MW existing plus 30 MW planned). The ELCC at 122 MW is 25.4 MW (i.e., 20.8 per cent of 122 MW), compared to 22.6 MW currently. The addition of 30 MW of wind turbines results in only a 2.8 MW (i.e., 25.4 MW minus 22.6 MW) increase in ELCC towards the Company's capacity requirement. As such, additional wind energy generation is not an effective capacity resource for meeting the Company's future capacity requirements.

³⁸ The total amount of wind energy contracted by Maritime Electric is 92 MW; however, actual wind ELCC values in 2024 are slightly less than 22.6 MW due to reductions in capacity at the Hermanville wind farm.

1 *Solar Energy*

2 Maritime Electric purchases all the energy output from PEIEC's 10 MW utility-scale solar farm

3 located in Slemon Park, PEI. The Company also has a growing number of net metered customers

4 with solar panel systems. Per the *Renewable Energy Act*, the Company must accept and credit

5 full retail value for all excess energy from net-metered customers. A list of on-Island solar energy

6 resources and their size is shown in Table 3. In 2023, solar energy accounted for 1.3 per cent of

- 7 the Company's total energy supply.
- 8

9 a. Net metered generation includes Maritime Electric service territory only. Although the first net metered generator
10 was registered in 2007, most of the net metered generation has been connected since the August 2019 10 was registered in 2007, most of the net metered generation has been connected since the August 2019 launch of
11 efficiencyPEI's Solar Electric Rebate Program. 11 efficiencyPEI's Solar Electric Rebate Program.
12 b. Although Maritime Electric does not purchase e

12 b. Although Maritime Electric does not purchase energy output from the City of Summerside solar farm, it is included as it contributes to the Company's renewable balancing requirements. as it contributes to the Company's renewable balancing requirements.

14

15 The PEI Government intends to further increase the amount of solar energy produced on PEI.

16 The recent Slemon Park Microgrid solar farm, owned by the PEIEC, and the approximate 12 MW

17 of net-metered solar customers connecting to the system each year are examples of working

18 towards this goal. The Company has also received several requests from private solar energy

19 developers looking to connect facilities to the Company's transmission system. Table 4 shows

20 the current list of solar energy projects requesting to connect to Maritime Electric's system.

 The expected development of new solar energy projects on PEI will increase Maritime Electric's supply of renewable energy, which supports the Province's net zero emission targets. The new solar energy projects may provide Maritime Electric with fixed energy prices through long-term PPAs, which would help stabilize energy costs and protect customers from energy market price 6 increases in the region.^{[40](#page-33-1)} The Government of PEI's *Renewable Energy Act* will establish the rate for the energy produced.

 Solar energy resources are intermittent and, like wind, cannot supply all of the Company's energy needs. Figure 9 is a continuation of Figure 7 with the addition of expected solar energy generation for the same October 2028 period previously discussed. The solar data shown in this Figure is based on the solar irradiance and hourly customer load experienced during this period in 2023 and assumes that all solar projects in Table 4 are operational. The Figure demonstrates that the new solar generation supplies more of the Company's hourly customer load; however, there are periods when there is no expected wind or solar generation (circled in red) that must be supplied by other sources. Maritime Electric expects to continue to source the required energy from off- Island, via the Interconnection, when the supply from on-Island renewable energy generation is insufficient. The addition of solar energy is expected to result in an increased number of periods when the combination of wind and solar generation will exceed the hourly customer load (i.e.,

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³⁹ Project numbering has been continued from the list of wind projects to provide a total number of renewable projects requesting to connect to Maritime Electric's transmission system.

⁴⁰ All utility-scale renewable energy currently purchased by Maritime Electric is secured at or near the legislated minimum purchase price. This price is primarily fixed with only a portion being escalated each year based on the Canadian Consumer Price Index.

periods circled in green). The amount of excess energy during these periods is also expected to

- increase, requiring the excess energy to be stored, exported to off-Island markets or curtailed.
-

 Like wind energy generation, the intermittency of solar energy generation impacts its ability to count towards a capacity requirement. However, as Maritime Electric's system peak typically occurs in January or February between 5 p.m. and 6 p.m., which is after sunset (i.e., no solar generation), solar energy generation cannot be counted at all towards the Company's capacity 9 requirement.^{[41](#page-34-0)} As such, additional solar energy generation is not a capacity resource option for Maritime Electric.

Combustion Turbines

Maritime Electric owns and operates three CTs, as detailed in Table 5.

⁴¹ An ELCC calculation is not carried out for solar energy because the system peak occurs after sunset. If ELCC and LOLE calculations were completed for solar energy, it would result in an ELCC of 0 MW.

1

2 A decision on the need to replace CT1 and CT2 when they reach end of life will be made at a 3 future date.

4

5 As previously indicated, Maritime Electric's CTs provide peaking and backup energy and

6 represent only 0.2 per cent of the Company's total energy supply. Table 6 provides combined

7 operating data for the Company's three CTs.

8

9 a. Includes only CT generation related to the supply of Maritime Electric customers. Excludes generation for
10 wholesale purposes which typically result from Emergency Energy Supply to Others. 10 wholesale purposes which typically result from Emergency Energy Supply to Others.
11 b. Based on the Prince Edward Island 50th Annual Statistical Review 2023.

11 b. Based on the Prince Edward Island $50th$ Annual Statistical Review 2023.
12 C. Estimate based on Environment Canada forecast.

c. Estimate based on Environment Canada forecast.

⁴² CT3 has a 50 MW nominal rating, but the maximum output is 49 MW, as 1 MW is used to run the internal systems of the unit.
Maritime Electric's CTs are dispatchable, and as such, they are excellent capacity resources. Electric utilities operate dispatchable generation as baseload or peaking generators. Baseload generators are continuously operated, except during planned and unplanned outages. Peaking generators are only operated as required and the sequence of their dispatch is typically based on economics, as peaking generators typically produce more expensive energy than baseload and renewable generators. While Maritime Electric's CTs are considered peaking generators, they are primarily standby or backup resources, which means they are operated:

-
- when there are transmission system outages on PEI or elsewhere in the region that disrupts the Company's ability to import sufficient energy through the Interconnection;
- **•** when the Interconnection is at its transfer capacity limit and additional energy is needed, which is known as curtailment by NB Power events;
- **13 to hold the import of energy across the Interconnection to the scheduled amount, which is** 14 **Known as a Hold-to-Schedule directive from NB Power**;^{[43](#page-36-0)}
- for providing emergency energy to third parties when there are supply shortages in the region, which may be due to planned or unplanned generator outages, or due to higher-than-expected customer load; and
- **·** for monthly test runs to ensure each unit remains in good working order.
-
- To demonstrate the limited operation of Maritime Electric's CTs, their operating hours and gross
- generation data from 2019 to 2023 are shown in Table 7.

Purchases from NB Power are reserved (i.e., scheduled) on an hourly basis, and at times the hourly forecast can be incorrect. Large discrepancies are often caused by an unexpected shortfall of wind or solar energy and, during these times, dispatchable generation may be required to return the Interconnection to its scheduled amount.

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1 a. NB Power Hold-To-Schedule refers to circumstances where Maritime Electric requires additional energy beyond

2 what was reserved during the hourly energy scheduling. NB Power is often able to cover Maritime Electric's what was reserved during the hourly energy scheduling. NB Power is often able to cover Maritime Electric's increased energy requirements that typically result from reduced renewable production; however, during system constraints, or elevated third-party reservations, there are periods when NB Power is unable to increase deliveries above the scheduled amounts. As renewable generation has no ability to increase generation levels on demand, Maritime Electric is left with two possibilities: shed customer load or start dispatchable generation.

b. Emergency energy supply to others refers to a neighbouring utility being unable to meets its energy needs for any reason and requesting that Maritime Electric generate energy to cover the shortfall or a portion thereof. In this situation, the requesting utility is responsible to cover all associated costs.

10 c. On-Island transmission related refers to generation in response to Interconnection or on-Island transmission 11 constraints.
12 d. Curtailment

d. Curtailment by NB refers to generation in response to transmission constraints in NB.

 Maritime Electric's CTs are also used to supply the Company's share of the Maritime Area operating reserve requirement, as set by the Northeast Power Coordinating Council ("NPCC"). The operating reserve requirement states that the Maritimes area must have the ability, within 10 minutes, to replace the energy from an unplanned loss of the largest generator in the area. The largest generator in the Maritimes area is Point Lepreau, with a generating capacity of 660 MW,

and Maritime Electric's share of the operating reserve requirement is currently 19.7 MW.^{[44](#page-37-0)}

¹³

This is non-spinning or supplemental reserve, and the CTs can be used for both 10-minute and 30-minute reserve. To qualify for supplemental reserve, the generator must be available but does not have to be operating (i.e., spinning).

5.2 Energy Sales and System Peak Growth

Customer load determines both the amount of energy and capacity that a utility needs to supply.

- Customer load over a year determines the utility's annual energy supply requirement, measured
- in megawatt-hours ("MWh"), and the highest instantaneous customer load throughout the year
- 5 (i.e., the system peak) is used to determine the capacity requirement, measured in MW.^{[45](#page-38-0)}
-

 In recent years, Maritime Electric's system peak has increased significantly. The two primary factors contributing to the Company's recent customer load growth are (1) PEI's rapid increase in 9 population and (2) the transition from fossil fuel energy sources to electricity (i.e., electrification).

Increases in population and electrification are discussed in the following sections.

5.2.1 Population Increase

 PEI's population has increased rapidly in recent years. Since 2015, PEI has experienced the 14 fastest population growth of any Canadian province.^{[46](#page-38-1)} Figure 10 shows that PEI's population increased by 23 per cent since 2015, whereas Canada's population increased by only 16 per cent

during the same period.

1 MWh is equal to 1 million watt-hours (Wh).

PEI's population grew by 23.4 per cent since July of 2015, the highest growth among Canadian provinces. The Territory of Yukon did experience a higher population growth of 23.8 per cent during the same period: <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1710000901> - Statistics Canada Population estimates, quarterly.

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2 The population growth experienced on PEI has resulted in the need for significantly more housing.

3 Figure 11 shows that the annual number of housing starts on PEI has increased by 391 per cent

4 since 2015, whereas the number of housing starts in Canada has increased by only 46 per cent

5 during the same period. 47

⁴⁷ Based on housing starts in July of each year.

 PEI's increase in population and housing starts has had a direct impact on Maritime Electric's customer load, as most new construction on PEI has electricity as a primary source of heat. Developments of new single- and multi-family buildings are predominantly installing electric heat pumps supplemented by electric resistive backup heaters. The impacts of the electrification of space heating are discussed further in the following sections.

5.2.2 Electrification

 Electrification refers to the transition from fossil fuel energy sources to electricity. The most significant contributor to Maritime Electric's customer load growth has been the electrification of space heating.

 Historically, PEI residents used primarily furnace oil or wood for most of their space heating needs and, at that time, electricity accounted for less than 10 per cent of PEI's space heating needs. Electric space heating, primarily through electric boilers and convection air heaters, briefly became popular around 2007, when global oil and natural gas prices increased dramatically. As oil and natural gas prices subsided following a broad economic crisis in 2008, the popularity of electric space heating also decreased. However, since the early 2010s, there has been a gradual trend back to electric space heating that was kickstarted by heat pump technology improvements,

1 and increased further when government incentives began in 2015.^{[48](#page-41-0)} This has converted a significant portion of the furnace oil and wood-based space heating on PEI to electric space heating, with corresponding increases in the need for electric energy and capacity.

 Since 2015, the Governments of PEI and Canada have introduced many programs to incentivize the installation of heat pumps and other electric-based energy efficiency equipment, and the purchase of electric vehicles ("EV"). Recent programs include the Oil to Heat Pump Affordability 8 ("OHPA") Program, jointly announced by both Governments (February 2023),^{[49](#page-41-1)} and the Province's expansion of eligibility requirements under its Net Zero Free Heat Pump Program 10 (January 2024).^{[50](#page-41-2)} The OHPA Program incents residents with oil heating systems to install electric heating systems, and differs from past incentive programs as it can be applied towards the costs associated with the removal of oil heating systems. Maritime Electric estimates that the OHPA Program alone will result in an additional 30 MW of system peak load. These programs have accelerated the transition to electric space heating and driven higher demand for electric energy and capacity on PEI.

 To date, residential space heating electrification has had the greatest impact on Maritime Electric's system peak, and this trend is expected to continue. Figure 12 shows a breakdown of how primary heating systems on PEI have changed since 2008. The Figure also shows significant growth in the use of electricity as a primary heating source starting in 2014, but that oil, wood and propane heating systems continue to represent a large portion of primary heating systems on PEI. This indicates that the growth in electricity, as a portion of primary heat systems, could continue for some time.

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⁴⁸ Early heat pump technology could not provide adequate heat during extreme cold weather. Technology improvements continue to increase efficiencies and the output capacity at cold temperatures.

 <https://www.canada.ca/en/natural-resources-canada/news/2023/02/oil-to-heat-pump-affordability-grant0.html> - Natural Resources Canada, Oil to Heat Pump Affordability Grant (Prince Edward Island)

 [https://www.princeedwardisland.ca/en/news/nearly-3000-free-heat-pumps-installed-across-the-province-even](https://www.princeedwardisland.ca/en/news/nearly-3000-free-heat-pumps-installed-across-the-province-even-more-islanders-now-eligible)[more-islanders-now-eligible](https://www.princeedwardisland.ca/en/news/nearly-3000-free-heat-pumps-installed-across-the-province-even-more-islanders-now-eligible) – Government of PEI, Nearly 3,000 free heat pumps installed across the province; even more Islanders now eligible

2 The demand for electricity on PEI will also increase due to the electrification of transportation. In 3 2022, 227 million litres of gasoline, 91 million litres of diesel and 113 million litres of furnace oil 4 (i.e., light fuel oil) were sold on PEI.^{[51](#page-42-0)} As the PEI Government strives to achieve its net zero 5 targets, converting 50 per cent of these sources of energy to electricity would result in an 6 estimated 33 per cent increase in annual electricity supply requirements.^{[52](#page-42-1)}

7

8 **5.2.3 Energy Sales Growth**

9 The impact that increased population and electrification are having on PEI's electricity load is 10 demonstrated in Figure 13. PEI's electricity load has grown by 66 per cent since 2005, which is 11 over five times the Canadian average and the highest out of all Atlantic Canadian provinces.

⁵¹ <https://www.princeedwardisland.ca/en/publication/annual-statistical-review-2022> - Government of PEI, 2022 Annual Statistical Review (Table 93).

⁵² The PEI Government's 2040 Net Zero Framework sets a target of 55 to 65 per cent reduction in emissions from transportation and 85 to 90 per cent reduction in emission from buildings by 2040: <https://www.princeedwardisland.ca/en/publication/2040-net-zero-framework> - Government of PEI, 2040 Net Zero Framework.

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 Historically, most of PEI's space heating came from furnace oil-based sources; therefore, electrification is leading to significant electricity load increases. In comparison, provinces like NB historically had higher portions of electric-based heating sources; therefore, customer load increases in that province have been more moderate. As a result, PEI's electricity load growth since 2005 is much higher than other provinces.

8 As increases in population and electrification on PEI are expected to continue, Maritime Electric forecasts continued growth in annual energy sales. Figure 14 shows the Company's forecast 10 annual energy sales for the 10-year period from 2024 to 2033 in gigawatt-hours ("GWh").^{[53](#page-43-0)} The Figure shows that annual energy sales in 2033 are expected to be 27 per cent higher than 2023 levels, which is comparable to the energy sales growth in the previous 10-year period from 2014 to 2023.

1 GWh is equal to 1 billion watt-hours (Wh).

2 Although the Company must ensure it has sufficient energy resources to meet growing energy 3 sales, the purpose of this Application is to address the Company's growing system peak and 4 corresponding capacity requirements, which is discussed in the following section.

5

6 **5.2.4 System Peak Growth**

 The electrification of space heating has a greater impact on system peak compared to annual energy sales because most electric space heating is being added in the form of heat pumps. Heat pumps are an efficient way to provide space heating, but their efficiency decreases as 10 temperatures drop.^{[54](#page-44-0)} Additionally, many heat pump users have electric resistive heating systems as a supplementary (i.e., backup) heat source. The result is the potential for extremely high system peaks during cold weather due to (1) a lack of diversity due to the decreased efficiency of

⁵⁴ Heat pumps can output between 2.0 and 5.4 kWh of heating energy for every 1 kWh of electric energy consumed under ideal conditions. This ratio can drop to 1:1 (i.e., 1 kWh of heating energy output per 1 kWh of electric energy consumed) during cold weather: [https://natural-resources.canada.ca/energy-efficiency/energy-star](https://natural-resources.canada.ca/energy-efficiency/energy-star-canada/about/energy-star-announcements/publications/heating-and-cooling-heat-pump/6817)[canada/about/energy-star-announcements/publications/heating-and-cooling-heat-pump/6817](https://natural-resources.canada.ca/energy-efficiency/energy-star-canada/about/energy-star-announcements/publications/heating-and-cooling-heat-pump/6817) – Government of Canada, Heating and Cooling with a Heat Pump.

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1 heat pumps and (2) the operation of supplementary resistive electric heat, which compounds the 2 impact on system peak.^{[55](#page-45-0)}

3

 In recent years, Maritime Electric's system peak has increased significantly. Figure 15 shows the 5 Company's annual system peak from 2014 to 2023.^{[56](#page-45-1)} In the 5-year period from 2014 to 2018, the Company's system peak increased by a compound annual growth rate of 2.7 per cent. In the subsequent 5-year period from 2019 to 2023, the Company's system peak increased by a compound annual growth rate of 10.0 per cent. Overall, the Company's annual system peak increased by 60 per cent between 2014 and 2023, whereas annual energy sales increased by only 27 per cent during the same period. The Company forecasts that the system peak will increase by 32 per cent in the 10-year period from 2024 to 2033. The system peak forecast forms the basis of the Company's capacity requirements, which are discussed in the following section.

13

14

⁵⁵ An electric power system relies on the diversity of customer loads to manage peak demand. For instance, customers operate electric cooking, laundry and hot water appliances at different times, contributing to a diverse electric load. However, when ambient air temperatures decrease, heat pumps need to run longer to maintain a comfortable indoor temperature. This results in a larger number of heat pumps operating simultaneously, reducing the natural diversity of customer load and leading to higher system peaks.

⁵⁶ The 2023 system peak occurred during the February 2023 polar vortex weather event. Polar vortexes are uncommon and resulted in an abnormally high system peak due to the extreme cold. Maritime Electric's 2024 system peak forecast is based on normal winter conditions.

5.3 Capacity Requirements

 Maritime Electric has a responsibility to ensure that it has sufficient capacity resources to meet customer needs; therefore, the Company develops a capacity requirement forecast to determine the amount of capacity resources it must have in the future. This forecast is based on: (1) the 5 Company's unadjusted system peak forecast;^{[57](#page-46-0)} (2) the expected impact of controllable demand side management ("DSM"); (3) the availability of interruptible customer loads; and (4) the Company's planning reserve requirement. Each of these elements are discussed in more detail 8 in the following sections. The Company's capacity requirements forecast is provided in Table 9 in Section 5.3.5.

5.3.1 Unadjusted System Peak Forecast

Maritime Electric forecasts its unadjusted system peak by separating it into three components:

(1) residential space heating; (2) non-space heating; and (3) large industrial. Table 8 shows a

- summary of the unadjusted system peak forecast.
-

a. 2024 values are based on the actual system peak observed in January 2024.

 As the label suggests, the residential space heating category includes peak load related to space heating for the Residential rate class. This part of the forecast is based on a regression analysis that is used to evaluate the impacts of ambient temperature on the residential space heating load for the most recent heating season. The forecast for residential space heating is then calculated based on an ambient temperature of -13.6°C, which is the average temperature at which the peak load occurred in the past 10 years. Added to that calculation is the estimated incremental residential heating peak expected from housing starts, residential electrical panel upgrades and

The Company's unadjusted system peak forecast refers to the Company's system peak forecast before adjusting for demand side management, interruptible customer loads and planning reserve.

heat pump installations, with heat pump installations having the largest impact.^{[58](#page-47-0)} The Company's 2 forecast is based on the addition of 5,580 heat pumps per year in 2024 and 2025, and 2,430 heat 3 pumps per year between 2026 to 2033 in existing dwellings.^{[59](#page-47-1)}

4

 The non-space heating category includes peak load related to non-space heating for the Residential rate class, and peak loads related to the General Service, Small Industrial, Street Lighting and Unmetered rate classes. This part of the forecast is based on applying a historic load 8 factor to the previous year's forecast of non-space heating energy sales.^{[60](#page-47-2)} Increases to energy sales for the category are forecast based on several factors, including:

10

11 **•** forecast number of housing starts:

12 **·** forecast number of customer-owned EVs, for which the Company's estimate includes 13 2,000 customer-owned EVs in 2024 increasing to a 16,000 by 2033; and

14 • forecast real gross domestic product ("GDP") for PEI.^{[61](#page-47-3)}

15

 The large industrial category includes peak load related to the Large Industrial rate class. This part of the forecast assumes that the large industrial peak load will be consistent with past peak loads, and is adjusted based on announcements of production changes from existing or new Large Industrial customers.

20

21 **5.3.2 Controllable Demand Side Management**

22 DSM is a strategy used by the PEIEC to help reduce Maritime Electric's system peak, which 23 benefits customers through avoided or delayed system capacity costs.^{[62](#page-47-4)} Current examples of

24 DSM programs on PEI include the LED light bulb and energy efficient appliance programs

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⁵⁸ The forecast number of housing starts is based on a forecast from the Conference Board of Canada. Residential electrical panel upgrades refer to customers upgrading their household electrical panel from 100 amperes ("A") to 200 A panels. This typically occurs as customers replace, or supplement, existing fuel-fired heating systems with electric heating systems.

 59 The number of heat pumps associated with new housing is calculated separately.

Load factor is the ratio of an electrical systems average load to its peak load, which is calculated by dividing the total energy sales by the peak load multiplied by 8,760 hours in a year.

⁶¹ The forecast real GDP for the province is based on a forecast from the Conference Board of Canada.
⁶² Slowing down peak system growth avoids additional generating canacity that must be procured on an a

Slowing down peak system growth avoids additional generating capacity that must be procured on an annual basis and delays the need to upgrade or expand both transmission and distribution systems in response to system growth.

1 administered by efficiencyPEI.^{[63](#page-48-0)} Program costs associated with DSM are currently funded by Government, Maritime Electric and the City of Summerside. Projected system peak reductions associated with DSM programs are incorporated into the Company's capacity requirements forecast.

 There are two types of DSM programs: (1) non-controllable; and (2) controllable. Non-controllable DSM programs aim to improve energy efficiency and lower Maritime Electric's energy sales, which reduces the Company's energy sales forecast. The two examples above (LED light bulb and energy efficient appliance programs) are both considered non-controllable DSM programs. Controllable DSM programs aim to shift electricity usage from system peak periods to off-peak periods, which impacts the Company's system peak forecast. Examples of controllable DSM programs include incenting the installation of controllable water heaters and heating system thermostats, which can be controlled by the electric utility during system peaks.

 The PEIEC provides Maritime Electric with a system peak reduction forecast based on their planned DSM programs, which is incorporated into the Company's capacity requirements forecast. The impact of non-controllable DSM programs is reflected in the Company's energy sales forecast and its unadjusted system peak forecast. Forecasted system peak reductions from controllable DSM programs, however, are directly subtracted from the Company's system peak 20 forecast in the Company's capacity requirements forecast, shown in Table 9.^{[64](#page-48-1)}

 Significant controllable DSM programs have not yet been implemented because the Company does not yet have a smart meter system (i.e., advanced metering infrastructure or "AMI") in place to enable communication with a customer's meter, a key feature used for controllable DSM programs in other jurisdictions. However, the Commission recently approved a Company 26 application to upgrade to an AMI system. Once implemented, this AMI system will enhance

⁶³ On PEI, the responsibility for DSM programs resides with the PEIEC, who administers such programming through efficiencyPEI.

 In accordance with direction from the Multiregional Modeling Working Group's ("MMWG") procedural manual (V35) for electrical system modeling, the impacts of controllable DSM are allowed to be included in generating capacity planning but are not included in transmission planning. MMWG is a subgroup of NPCC's Eastern Interconnection Reliability Assessment Group.

Utility Application UE20737 was approved by the Commission in October 2024.

 efficiencyPEI's ability to incorporate controllable DSM programs in the foreseeable future, which is reflected in the forecast.

5.3.3 Interruptible Customer Loads

 Interruptible customer loads are those typically associated with large-usage customers that agree to reduce or eliminate their electricity consumption when there is insufficient generating capacity to meet the system peak. In exchange for allowing the utility to reduce or eliminate their electricity consumption when required, the customer receives a monthly billing credit based on the size of the load that the Company is allowed to interrupt. The use of interruptible customers is a common and cost-effective method for reducing capacity requirements and related costs in the industry. Maritime Electric has a total of 14 MW of interruptible customer load that is subtracted from the Company's unadjusted system peak forecast when calculating the capacity requirements forecast.

5.3.4 Planning Reserve Requirement

 Planning reserve is a fixed amount of generating capacity that a utility is required to reserve to account for extreme system peaks or the unplanned failure of a generator. The magnitude of Maritime Electric's planning reserve is dependent on the level of planning reserve required for the Maritimes area by the NPCC and forms part of Maritime Electric's Interconnection Agreement 20 with NB Power.^{[66](#page-49-0)} This Agreement stipulates that Maritime Electric must have a generation planning reserve equal to 15 per cent of its forecast annual system peak, adjusted for DSM and interruptible customer loads. For reliability purposes, the Interconnection Agreement also stipulates that a single generator cannot account for more than 30 per cent of Maritime Electric's total generating capacity resources. The 15 per cent planning reserve is added to Maritime Electric's adjusted system peak forecast when calculating the Company's capacity requirements forecast, shown in Table 9.

⁶⁶ The Maritimes area consists of PEI, NB, NS, and northern Maine. The NPCC planning reserve amount for the Maritimes area is based on an amount that would require the area to shed firm load due to insufficient generating capacity no more than one day in 10 years, on a probabilistic basis.

1 **5.3.5 Capacity Requirements Forecast**

2 As discussed above, Maritime Electric's capacity requirements forecast provides the total amount

- 3 of capacity required to meet customers' future needs. Table 9 shows the calculations for Maritime
- 4 Electric's capacity requirements forecast for the 10-year period from 2024 to 2033. The forecast
- 5 shows that, despite increases in controllable DSM, the Company's capacity requirement is
- 6 expected to increase by 114 MW during the forecast period (454 minus 340 MW).
- 7

8

9 **5.4 Capacity Resource Adequacy Assessment**

 Maritime Electric has a contractual obligation to secure adequate generating capacity, referred to 11 as the Company's capacity requirement, to meet the needs of its customers.^{[67](#page-50-0)} The Company evaluates its ability to meet the capacity requirements by completing a capacity resource adequacy assessment ("CRAA"), annually. The CRAA is based on the Company's capacity requirements forecast, which is discussed in Section 5.3.5, and summarized in Table 9. The CRAA is a 10-year outlook that compares the capacity requirements forecast to the expected available generating capacity resources.

⁶⁷ The contractual obligation is per the 1977 Interconnection Agreement between Maritime Electric and NB Power, which was established to regulate the amount of capacity that Maritime Electric and PEI contributes to the overall Maritimes area regional capacity requirements.

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1 Table 10 shows the 10-year CRAA forecast, which includes Maritime Electric's existing capacity

2 resources, as discussed in Section 5.1.2. The CRAA forecasts a capacity deficit of 60 MW in

- 3 2025, which is equivalent to the supply of electricity to approximately approximately 17,100 homes
- 4 during system peak periods, increasing to 156 MW by 2033, which is equivalent to the supply of
- 5 electricity to approximately 44,600 homes during system peak periods.
- 6

8 levels.

7 a. Firm capacity purchases for 2024 and 2025 are reserved under the current EPA, and 2026 to 2033 are projected

8 b. NB Power has allowed Maritime Electric to purchase short-term capacity in 2024 and in previous years t b. NB Power has allowed Maritime Electric to purchase short-term capacity in 2024 and in previous years to cover increased capacity requirements compared to the level reserved in the EPA. Future availability of such short-term capacity is uncertain and, therefore, not included in this assessment. Table 17 in Section 7.2.2 shows a version of the CRAA if the maximum amount of short-term capacity is available in the future.

13 c. Wind ELCC is a probabilistic calculation that determines the amount of capacity that will be available from the 14 entire wind fleet during system peak.
15 d. CT1 and CT2 have anticipated retirer

15 d. CT1 and CT2 have anticipated retirement dates of 2031 and 2033, respectively.
16 e. A capacity deficit means that the Company has insufficient resources unde

16 e. A capacity deficit means that the Company has insufficient resources under contract to meet its capacity
17 requirement and is at risk of not being able supply customer load during system peak periods. 17 requirement and is at risk of not being able supply customer load during system peak periods.

18

19 Figure 16 shows a graphical representation of the CRAA for 2015 to 2033. The Figure shows an 20 increasing capacity resource deficit if the Company continues to rely on existing capacity resources, which includes the assumption that 190 MW of capacity will continue to be available

- from NB Power, but nothing additional.
-

 Until recently, the Company had an amount of on-Island dispatchable generating capacity equal to at least 50 per cent of its system peak. The recent retirement of the Charlottetown Steam Plant and significant customer load growth has significantly reduced this percentage. In 2023, the amount of on-Island capacity resources fell to 31 per cent of the Company's system peak, and the percentage is forecast to fall to 17 per cent by 2033 if on-Island capacity resources are not added. The Project is expected to raise the on-Island dispatchable generation level to above 50 per cent by 2031.

6.0 PROPOSED PROJECT

 Population growth and electrification are resulting in significant increases to Maritime Electric's system peak. The Company forecasts a capacity deficit of 156 MW by 2033. Without additional capacity resources, it will become increasingly difficult to meet the needs of customers during system peak periods. Maritime Electric has a responsibility to ensure that it has sufficient capacity resources to meet future customer needs. To address the forecast capacity deficit, the Company submits this Application seeking approval of the On-Island Capacity for Security of Supply Project, which includes the following three components:

■ a 10 MW/40 MWh BESS;

• a 50 MW CT4 with synchronous condenser capability; and

■ a 90 MW RICE plant.

 The capacity values listed in this section (i.e., 10, 50 and 90 MW, respectively) are nominal capacity values, meaning they are approximate and may differ slightly from actual installed capacity values. During the RFP process, Maritime Electric will obtain proposals for a BESS, CT and RICE plant with capacity values that may differ from the Project components defined in this 18 section.^{[68](#page-53-0)}

 The Project will add 150 MW of additional on-Island capacity resources, which is equivalent to the supply of electricity to approximately 42,900 homes during system peak periods. The Company has selected the CGS site for the CT4 component, but further analysis is required to determine the location of the BESS and RICE plant components.

6.1 Battery Energy Storage System

 Maritime Electric is seeking Commission approval to install a 10 MW BESS with 40 MWh (i.e., 4 hours) of storage. The BESS will be used to help meet the Company's annual ancillary service 28 and capacity requirements, reducing the amount of these products currently purchased from NB Power.

⁶⁸ For example, the CT is currently based on a 50 MW General Electric LM6000 PC Combustion Turbine; however, alternate manufacturers have different product offerings, and the actual output will not be known until final product selection is completed.

Description

 The exact location of the BESS has not yet been finalized. The BESS will be integrated into a substation that has a minimum of two paths to Maritime Electric's transmission system and distribution load. The BESS will include:

-
- $6 \rightarrow$ $6 \rightarrow$ battery storage modules with the capability to store 40 MWh of energy; 69
- 10 MW of inverters to convert AC electricity into DC for storage and to convert the DC energy back to AC for use on the system when required;
- 10 MW of transformation to step-up the output voltage to the station voltage; and
- 10 **•** additional equipment as required to integrate the BESS into the electrical system.^{[70](#page-54-1)}
-
- The BESS is an excellent capacity resource option due to its increased flexibility and positive 13 financial impact.^{[71](#page-54-2)} It can serve as a capacity resource or provide fast-acting grid services (i.e., ancillary services), both of which are currently sourced from off-Island resources. Additionally, the BESS has the potential to offer future services, such as energy arbitrage, which could help ensure that renewable energy generated on PEI is consumed locally in the future.
-
- Figure 17 shows a picture of the City of Summerside's 10 MW/20 MWh BESS that was installed
- as a part of its recent Sunbank Project.

⁶⁹ Maritime Electric has not yet selected a battery manufacturer, but 40 MWh of energy storage would equate to approximately 10 shipping container-sized modules.

 The list is a high-level list of equipment and is not exhaustive. The upfront engineering will determine the final arrangement and necessary equipment.

 The BESS has a positive net present value when the credit for avoided off-Island capacity purchases and ancillary services are considered.

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Operation

 During the winter period from December through February (i.e., the high customer load period), the BESS will serve as a 10 MW capacity resource, which will help the Company meet its capacity requirement. During this period, the BESS will remain fully charged and available for use during system peak periods. Specifically, it will be unavailable to (1) respond to Hold-to-Schedule directives from NB Power and (2) backstop renewable energy resources.

 For the remainder of the year from March through November (i.e., moderate to low customer load periods), the BESS will help the Company meet its ancillary service requirements, as per the Company's Interconnection Agreement with NB Power. Using the BESS as a capacity resource during the winter period and as ancillary service support for the remainder of the year maximizes its economic benefit. Table 11 shows the types and quantities of ancillary services that Maritime Electric is required to provide, and the current cost of securing those services from the New Brunswick Power Open Access Transmission Tarriff ("NB Power OATT").

 [https://www.saltwire.com/atlantic-canada/news/summerside-now-frequently-powered-completely-by-its-own](https://www.saltwire.com/atlantic-canada/news/summerside-now-frequently-powered-completely-by-its-own-renewable-energy-sources-100968245/)[renewable-energy-sources-100968245/](https://www.saltwire.com/atlantic-canada/news/summerside-now-frequently-powered-completely-by-its-own-renewable-energy-sources-100968245/) - Saltwire, Summerside now frequently powered completely by its own renewable energy sources.

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1 a. Rates are published in the NB Power OATT Tariff under Schedules 3, 5 and 6:

2 https://tso.nbpower.com/Public/en/docs-EN/tariff/TransmissionTariff_20230101

5 b. Annual savings are associated with not having to purcha

https://tso.nbpower.com/Public/en/docs-EN/tariff/TransmissionTariff_20230101_EN.pdf - NB Power, OATT.

b. Annual savings are associated with not having to purchase these services for nine months of the year.

4

 Due to Maritime Electric's ancillary service requirement levels, the economic benefit of the BESS decreases for a BESS larger than 12.5 MW, at which point it would be considered oversized relative to the Company's ancillary service requirements. The Company selected a 10 MW BESS to maximize its economic benefit and allow it to be installed at a substation without the need for 9 significant substation upgrades.^{[73](#page-56-0)} 10

11 *Location*

12 Further engineering analysis is required to determine a final site for the BESS. Some of the criteria

13 for the selected location include:

- 14
- 15 **■** at or close to a distribution substation with significant year-round customer load, such that

16 it can supply up to 10 MW of customer load when required; and

- 17 **■** at a substation connected to a primary transmission line (preferably a transmission hub),
- 18 such that the substation will have good reliability and thus minimize periods when the
- 19 capacity and ancillary services are electrically disconnected from the system.

⁷³ All distribution substations operated by Maritime Electric are designed to accommodate a minimum of 10 MW. Additional rationale for selecting a 10 MW BESS is provided in Section 8.3 – Additional BESS Capacity.

 The Company intends to retain a consultant with expertise in BESS development to assist with the final design, including site selection. The selected site will require an Environmental Impact Assessment ("EIA") and a Development Permit, which will include opportunities for public and local jurisdictional input. **6.2 Combustion Turbine** Maritime Electric is seeking approval from the Commission to install a 50 MW CT (to be referred to as CT4) at the CGS. If approved, CT4 will primarily serve as peaking and backup generation to help the Company meet its capacity requirements, which will reduce the annual amount of generating capacity purchased from NB Power. *Description* The 50 MW CT will include: \bullet a 50 MW aeroderivative CT (similar to CT3);^{[74](#page-57-0)} **•** a 50 MW generator to convert the mechanical energy into AC electricity at 13.8 kV; **•** a 60 MW power transformer to step the voltage up from the generator output voltage of 18 13.8 kV to the transmission voltage of 69 kV;^{[75](#page-57-1)} **•** a 13.8 kV switchgear with the ability to supply up to four additional distribution circuits;^{[76](#page-57-2)} ▪ a two-million litre diesel storage tank, a diesel storage day tank and fuel filtration and forwarding equipment; \bullet a 30-metre high exhaust stack;^{[77](#page-57-3)}

· an air-intake filter house;

 CT4 is based on a General Electric LM6000 PC model with dual fuel capabilities of diesel and natural gas. GE LM6000 units are also capable of burning bio-diesel or bio-diesel/diesel mixes, as well as natural gas/ammonia and natural gas/hydrogen blends.

 The power transformer will be designed to provide backup capacity for the CT3 step-up transformer (X4), which currently does not have a backup. The existing X4 transformer will also be capable of providing backup to the new CT4 transformer.

 Including switchgear at the generator output voltage of 13.8 kV allows the Company to serve local distribution load if the transmission substation or transmission system is out of service. The switchgear also serves to off-load the power transformer.

The new exhaust stack for CT4 will match the existing CT3 stack.

1 a 700 kW black-start generator;^{[78](#page-58-0)}

 ▪ a clutch and associated equipment, allowing the generator to operate as a synchronous condenser; and

- additional equipment, such as fuel piping, station service and electrical cabling, compressed air and a water purification system for nitrogen oxide ("NOx") emission $6 \qquad \qquad \text{controls.}^{79}$ $6 \qquad \qquad \text{controls.}^{79}$ $6 \qquad \qquad \text{controls.}^{79}$
-

8 CT4 will increase Maritime Electric's on-Island capacity resources and reduce its reliance on off- Island capacity resources, which is expected to increase the reliability of the capacity supplied to customers. As demand for, and shortfalls of, capacity increases in the region, the cost to purchase off-Island capacity is expected to surpass the cost of CT4 in the future. Additionally, the reliability benefits of installing capacity on-Island, and the Interconnection and mainland transmission system upgrades required to purchase additional off-Island short-term capacity, make CT4 an attractive solution.

 One of the reasons a CT was selected for the Project was the ability to include a synchronous condenser, which can supply necessary reactive power without fuel consumption, thereby enhancing system stability and support. CTs are also a mature technology, and Maritime Electric has experience operating and maintaining CTs. Furthermore, the CGS site, which has hosted generation for over 100 years, has adequate space to accommodate an additional CT. CT4 will provide critical backup near the Company's largest customer loads, and it provides the best opportunity to significantly increase the Company's on-Island capacity in a timely manner.

Operation

CT4 will operate primarily in a peaking or backup capacity role, similar to the Company's existing

CTs (e.g., to respond to unplanned system events, Hold-to-Schedule directives from NB Power,

- and to support Maritime Electric's system during on-Island maintenance activities).
-

 Black-start generators are required to allow the CT to start during power outages. CT3 currently has a black-start generator, and it may be possible to use CT3's existing black-start generator to start either CT3 or CT4. Further engineering is required to determine if this alternate arrangement is favourable. The current CT4 cost estimate includes a separate black-start generator.

 The list is a high-level list of equipment and is not meant to be exhaustive. The upfront engineering will determine the final arrangement and necessary equipment.

 The inclusion of a synchronous condenser will provide dynamic system voltage support to the PEI electrical system with minimal operating cost. As customer load continues to increase, the Company expects that it will be required to operate CT4 as a synchronous condenser more frequently. This operational strategy will enable CT4 to supply necessary reactive power support 5 without fuel consumption.^{[80](#page-59-0)} By leveraging CT4 in this manner, Maritime Electric can better manage growing customer load, maintaining reliable and efficient service for customers.

7

8 *Location*

 The addition of CT4 at the CGS was considered when CT3 was installed in 2005. The site's physical layout and existing equipment, including a transmission substation, water treatment system, compressed air system, fuel storage and delivery infrastructure and an equipment building, were designed to accommodate a second CT. The benefits of locating CT4 at the CGS site are that:

14

15 • it will provide much needed backup during CT3 maintenance operations and vice versa;^{[81](#page-59-1)}

- 16 it will allow the step-up transformer for each of CT3 and CT4 to be a backup for the other;^{[82](#page-59-2)}
- 17 **·** it will provide the additional generation needed in Charlottetown to offload the West 18 Royalty 138 to 69 kV autotransformers during maintenance outages or periods of high 19 customer load;
- 20 the addition of a synchronous condenser, which is more cost effective when added to a 21 new CT, will provide reactive power for the transmission system in the Charlottetown and 22 **eastern PEI areas**: 83
- 23 **■** the CGS site provides reliable access to customer load through the Charlottetown Plant 24 substation, which has three transmission line connections and local distribution circuits;

⁸⁰ Further information on the benefits of a synchronous condenser and a justification for why Maritime Electric is including a synchronous condenser in the Project can be found in Section 7.5.

⁸¹ Because there is no other dispatchable generation in eastern PEI, CT3 maintenance can only occur during low customer load periods. As customer load increases, periods of time when CT3 maintenance can occur is limited. The addition of CT4 will reduce limitations for CT3 and CT4 maintenance periods.

⁸² The step-up transformer for CT3 (X4) is the only such transformer operated by Maritime Electric, meaning there is currently no backup. If X4 were taken out of service, CT3 would no longer be available to the transmission system. And a replacement transformer may have a 2-year delivery.

⁸³ The synchronous condenser must be in Charlottetown or eastern PEI to maximize its benefits because that is where 65 per cent of Maritime Electric's load is located. Further information on the benefits of a synchronous condenser and a justification for why Maritime Electric is including a synchronous condenser in the project can be found in Section 7.5.

- locating two CTs on the same site will improve operations and maintenance ("O&M") efficiency;
- some existing CT3 infrastructure may also be able to support CT4 (further analysis is required); and
- a portion of the environmental and municipal permitting work was completed in 2014 and 2015 for a previous CT4 application, which will reduce the costs of developing these applications and allow the Company to submit such applications in a timely manner.
-
- Figure 18 shows a proposed layout for the CGS site with the inclusion of CT4.
-

6.3 Reciprocating Internal Combustion Engine Plant

 Maritime Electric is seeking Commission approval to install a 90 MW RICE plant. The RICE plant will include five 18 MW RICEs, fuel handling and storage infrastructure, associated equipment, a substation and a transmission connection. If approved, the RICE plant will operate primarily as peaking and backup generation to help the Company meet its capacity requirements, reducing the amount of annual generating capacity that is currently purchased from NB Power.

Description

- The RICE plant will be constructed on a greenfield site, and will include:
-
- 11 \bullet five 18 MW RICEs: 84
- **·** five 18 MW generators (one for each RICE) to convert the mechanical energy into AC electricity;
- **•** two 60 megavolt-amperes ("MVA") power transformers to step up the voltage from the generator output voltage to the transmission voltage;
- two 1.5-million litre diesel storage tanks, one diesel storage day tank, fuel filtration and 17 forwarding equipment and a fuel containment system;^{[85](#page-61-1)}
- **· five exhaust stacks with silencers;**
- **•** one pre-engineered building to house the RICEs and associated equipment;
- one air-intake system, including weather hoods and filtration;
- **■** one engine cooling system;
- 22 One 700 kW black-start generator;^{[86](#page-61-2)} and
- additional equipment such as fuel piping, station service and electrical cabling and compressed air.[87](#page-61-3)
-

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 The RICE plant is based on a Wartsila model 20V32 engine with dual fuel capabilities. Dual fuel refers to the unit's ability to burn diesel and natural gas. RICEs are capable of burning a wide variety of fuels including bio-diesel or bio-diesel/diesel mixes, and natural gas/ammonia and natural gas/hydrogen blends.

⁸⁵ The provision of two 1.5 million litre diesel storage tanks will allow approximately seven days of operation, consistent with the current fuel storage capabilities for CT3 and that proposed for CT4. Two tanks also allow the Company to perform mandated internal tank inspections on either tank without taking the plant offline, which increases reliability for customers.

⁸⁶ A black-start generator will be capable of starting one RICE, which would then be used to start subsequent RICEs, as required.

⁸⁷ The list is a high-level list of equipment and is not meant to be exhaustive. The upfront engineering will determine the final arrangement and necessary equipment.

- The RICE plant will also require transmission line connections and potentially additional 69 kV to
- 138 kV voltage transformation. Figure 19 illustrates the typical site layout of a RICE plant.
-

 A RICE plant was selected for the Project because, similar to CTs, RICE technology is a dispatchable generating resource that is flexible (i.e., they can start, stop and ramp quickly) and is the most cost-effective dispatchable generation technology currently available to the Company. RICEs provide the best future fuel flexibility, and their modular design results in reduced reliability impacts during maintenance activities. RICEs also provide improved operating efficiencies when operating at lower output levels or during warmer weather, which will allow the Company to increase the overall efficiency of its generation fleet.

Operation

 The RICE plant will operate primarily in a peaking or backup capacity role, similar to the Company's existing CTs (e.g., to respond to unplanned system events, Hold-to-Schedule directives from NB Power, and to support Maritime Electric's system during on-Island

 <https://www.electricaltechnology.org/2021/08/diesel-power-plant.html> – Electrical Technology, Diesel Power Plant – Components, Operation and Applications.

 maintenance activities). RICEs have low minimum operating levels (i.e., in the range of one to two MW) and consistent operating efficiencies at low output levels; therefore, it will become the Company's primary source of on-Island dispatchable generation when only small amounts of 4 generation are required.^{[89](#page-63-0)} Also, RICE generation will be prioritized over CT generation during warmer weather, as RICE output and efficiency does not vary with outdoor air temperatures; in comparison, the output and efficiency of CTs decrease as air temperatures increase.

Location

There are several considerations when selecting the optimal location for a RICE plant on PEI:

-
- A plant that is ideally located at or near a transmission hub. Access to multiple 12 transmission lines increases the probability that the generation will be accessible during system contingencies, especially during adverse weather conditions.
- **•** A location in eastern or western PEI would have significant system benefits as these areas 15 will lack adequate system voltage support as customer load increases.
- The addition of CT4 at the CGS site will result in adequate backup generation in the Charlottetown area. Also, any further generation on the CGS site would require significant transmission upgrades, which is not as cost efficient as installing new transmission at a greenfield site.
- The RICE plant is not as well suited for installations near densely-populated areas as it requires a significant amount of land, which would be challenging to obtain and likely expensive.
- RICEs rotate at slower speeds with higher torque than CTs and generate low frequency noise and vibrations, requiring significant and costly sound attenuation and vibration isolation when located near densely-populated areas.
- **■** The City of Summerside currently maintains 15 MW of dispatchable RICEs in that area of the Province, which can be called upon by the Maritime Electric System Operator.
-

⁸⁹ In comparison, CT3 has a minimum load level of 15 MW. This means that when less power is required, another source, typically the Interconnection, must be reduced to allow CT3 to operate; resulting in increased operating costs and GHG emissions for the Company.

⁹⁰ The need for voltage support is currently higher in eastern PEI.

 If the Project is approved, the Company will engage a consultant with expertise in RICE plant development to assist with the site selection. The selected site will require EIA and Development

- Permit approvals, which will include opportunities for public and local jurisdictional input.
-

6.4 Project Cost

 S&L provided Maritime Electric with a cost estimate for the project. This section outlines the costing methodology employed, the AACE International ("AACE") cost estimate classification and 8 the specific contingencies applied to various project components. It also includes an assessment of the NPV of the project.

6.4.1 Costing Methodology

 In September 2023, S&L provided preliminary cost estimates for the dispatchable generation 13 portfolios that they recommended.^{[91](#page-64-0)} In September 2024, following the selection of the Project components (i.e., BESS, CT and RICE plant), the preliminary cost estimates were updated by S&L and are provided in Appendix A.

 Table 12 shows probable accuracy ranges based on the AACE cost estimate classification system. Based on the maturity level of the project definition and the estimating methods used, S&L categorized the cost estimates as Class 4/5 estimates based on the AACE cost estimate classification system and assigned a probable accuracy range of +/- 30 per cent to the estimates. The probable accuracy range is based on the total cost estimate after the application of 22 appropriate contingency.^{[92](#page-64-1)}

⁹¹ The initial cost estimate, completed in September 2023, has not been included in this Application in lieu of the current cost estimate provided in September 2024 and included in Appendix A. S&L also completed an alternate cost estimate for the 90 MW RICE plant in January of 2024 as a five-unit RICE plant was not priced in the original cost estimate.

⁹² The +/- value represents typical percentage variation at an 80 per cent confidence interval of actual costs from the cost estimate after application of contingency. Due to market and inflationary pressures and the expected length of time before equipment can be ordered, Maritime Electric does not expect the actual project costs will less than the cost estimate provided.

1 a. AACE International Recommended Practice No. 56R-08. Cost estimate classification system – as applied in
2 engineering, procurement, and construction for the building and general construction industries. 2 engineering, procurement, and construction for the building and general construction industries.

4 S&L estimated that approximately 2 per cent of the Project's engineering is complete. As a result,

5 contingencies are included in the cost estimate as follows:

- 6
- 7 **■** Materials: 25 per cent of cost;
- 8 Process equipment: 20 per cent of cost;
- 9 **·** Labour: 25 per cent of cost;
- 10 **·** Construction equipment: 25 per cent of cost;
- 11 **■** Subcontract: 20 per cent of cost; and
- 12 **■** Indirect contingency: 25 per cent of cost.
- 13

14 S&L's cost estimates were based on its recent experience with similar projects. Specific quotes

- 15 for individual components were not obtained, except for the CT and associated generator.
- 16 Transformer costs are based on quotes or recent purchases by Maritime Electric. A complete list

of cost assumptions is included as Exhibit J in S&L's Cost Estimate, which is included in Appendix

- 2 A^{93} A^{93} A^{93} A summary of the key cost assumptions are as follows:
-
- Start-up and commissioning support: 2 per cent of total project costs;
- Contractor general and administrative costs: 7 per cent of total project costs;
- **·** Contractor risk fee and profit: 10 per cent of total project costs;
- Owner's costs: 3 per cent of total project costs;
- **■** Warehouse spares: \$2,250,000; and
- Fuel costs are included for commissioning purposes, but "first fills" for fuel tanks have not been included.
-

6.4.2 Class 4/5 Cost Estimate

 The final cost of the Project will depend on actual capacity values, inflation and future exchange rates, which make it challenging to provide an accurate cost estimate today. These cost factors are described in detail below.

 The capacity values of each component described in this section (i.e., 10, 50 and 90 MW, respectively) are nominal capacity values. During the RFP process, Maritime Electric will obtain proposals for a BESS, CT and RICE plant with capacity values that may differ from the Project components defined in this section. For example, this Application assumes that the RICE plant will consist of five 18-MW RICEs, for a total of 90 MW (i.e., 5 x 18 MW = 90 MW). However, a manufacturer may propose four 20-MW RICEs, which would result in a total capacity of 80 MW $(4 \times 20 \text{ MW} = 80 \text{ MW})$. The cost of the Project is dependent on the specific BESS, CT and RICE models and capacity values selected, which will not be known until the RFP process is completed.

 Given that the construction of the BESS, CT4 and RICE plant is not anticipated to be complete until 2028, 2029 and 2030 respectively, inflation and future exchange rates will impact the final

⁹³ The cost estimate includes two separate estimates for each component of the project, an allocated estimate and an unallocated estimate. The unallocated estimates indicate the price of each line item before allowances for general conditions, project indirect costs and contingency. The allocated estimates include the general conditions, project indirect costs and contingency allowances in each line item within the cost estimate. The purpose of the unallocated estimates is to allow the reader to see the actual costs allowed for each item. The purpose of the allocated estimates is to allow the reader to more easily back items out of the cost estimate, such as the emission reduction and monitoring technologies, without having to recalculate the general conditions, project indirect costs and contingency allowances.

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 cost of the Project. The marketplace for generating capacity resources and electrical components continues to evolve as demand increases across North America and globally, which is resulting in inflation rates that are higher than other sectors. The cost estimates provided do not account for inflation between now and the time of purchase, and do not include interest during construction. Additionally, most of the Project components will be purchased in USD, which will be subject to the United States dollar ("USD") to Canadian dollar ("CAD") exchange rate at the time of purchase. S&L's cost estimate includes a 1.36 USD to CAD exchange rate.

 As discussed in Section 6.4.1, S&L's cost estimate is categorized as an AACE Class 4/5 with an assigned probable accuracy range of within 30 per cent, due to the limited amount of engineering design completed to date. Maritime Electric estimates that up to \$12 million of the total Project cost is required to complete additional upfront engineering work and issue RFPs for the Project, at which point more accurate cost estimates will be possible. The \$12 million cost is based on an estimate from S&L that 2.5 to 3.0 per cent of the total Project cost consist of upfront engineering. Table 13 shows the Project cost estimate of \$427 million and the percentage allocated to upfront

engineering, which is included in the \$427 million. The cost estimate is based on the S&L Class

4/5 cost estimate and 2024 estimated costs, which does not include inflation between 2024 and

the actual time of construction. Details of the S&L Cost Estimate are included in Appendix A.

b. The BESS cost estimate is included as Exhibit G in the S&L Cost Estimate.

1 a. Upfront engineering costs are included in the total estimated Project cost of \$427 million.

2 b. The BESS cost estimate is included as Exhibit G in the S&L Cost Estimate.

3 c. The allocated estimate for CT4 is inclu 3 c. The allocated estimate for CT4 is included in Exhibit A and the unallocated estimate is included in Exhibit B of the S&L Cost Estimate. The indicated cost does not include costs associated with the Biodiesel system, Continuous emissions monitoring system or the SCR system. Refer to Section 8.4 for information on why these options have been excluded from Table 13.

7 d. 2.5 per cent is included for CT4 (as opposed to 3.0 per cent) because site selection and a significant portion of the EIA is already completed for CT4, as discussed in Section 6.2.

e. The total cost of the RICE includes both the Substation Upgrades and 5 x 18 MW Wartsila Engines estimates 10 included in Exhibits E & F and H & I respectively. The allocated estimates are included in Exhibits E and H, and
11 the unallocated estimates are included in Exhibits F and I. The indicated cost does not include costs a the unallocated estimates are included in Exhibits F and I. The indicated cost does not include costs associated with the Biodiesel system, Continuous emissions monitoring system or the SCR system. Refer to Section 8.4 for 13 information on why these options have been excluded from Table 13. Maritime Electric has also included \$2.5
14 million for a transmission line to connect the RICE plant to the transmission system and \$200.000 for land 14 million for a transmission line to connect the RICE plant to the transmission system and \$200,000 for land
15 metchase. purchase.

16

17 Maritime Electric is seeking approval from the Commission for a deferral of the initial \$12 million

18 of the total Project cost for upfront engineering work and completion of the RFP process. The \$12

19 million of the total Project cost will be used to hire a consultant to help the Company complete:

20

- 21 **·** project site selection;
- 22 **■** upfront engineering design;
- 23 **· EIA and development permit processes;**
- 24 project specifications and scope of work development;
- 25 RFP development and bidding process for owner supplied components;
- 26
- **•** RFP development and bidding process for Engineering, Procurement and Construction 2 $('EPC")$ contract; 94
- proposal review and EPC contractor selection;
- contract negotiations; and
- updated project cost estimating and scheduling.
-

 As proposals are received from contractors for components of the Project, the Company will submit updated estimated Project costs, impact on rate base, revenue requirement and customer rates to the Commission.

6.4.3 Net Present Value Analysis

 While the cost of the Project will result in a customer rate increase, the Project is economically beneficial for customers as it fixes the cost of 150 MW of on-Island capacity over the respective 14 useful life of each project component.^{[95](#page-69-1)} The Project will reduce Maritime Electric's dependence on off-Island capacity resources and avoid their associated costs, which are expected to increase in the future.

 Table 14 shows the results of a 2024 NPV analysis that compares the costs and avoided costs of the Project, based on installation at a cost of \$427 million in 2024. The Table shows that, over the useful life of the Project components and on a present value basis, the Project's costs are expected to be more than offset by the avoided costs, resulting in a positive economic benefit to customers. The Project is estimated to result in savings of approximately 20 per cent compared to doing nothing and continuing to purchase capacity resources and ancillary services from NB Power.

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 EPC is a common type of contract for industrial construction such as generation plants. In an EPC arrangement, the Owner completes a certain level of the overall engineering and then retains an EPC contractor to complete the remaining engineering, procure the required components and complete the installation. This arrangement is how CT3 was constructed in 2005. With CT3, and commonly in industrial construction, the Owner selects and purchases some of the major equipment, especially equipment with long delivery timelines (such as the combustion turbine, generator, and transformer) and turns that equipment over to the EPC Contractor for installation. This preselection of equipment allows the Owner to determine the major equipment being installed and helps shorten overall project delivery times.

⁹⁵ Actual customer rate impact cannot be finalized until the RFP progress has been completed. An hypothetical rate impact is provided in Section 10.

1 a. Represents the avoided cost of installing a standalone synchronous condenser because the CT4 cost estimate
2 includes a synchronous condenser. Refer to Section 7.5 for more information. includes a synchronous condenser. Refer to Section 7.5 for more information.

3

4 Detailed inputs and calculations of the NPV analysis are provided in Confidential Appendix E.

5

6 **6.5 Project Delivery**

 As per the CRAA presented in Section 5.4, a capacity deficit of 60 MW is forecast in 2025 and 8 increasing to 156 MW by 2033.^{[96](#page-70-0)} Maritime Electric believes the Project proposed in this Application provides the best way to address this forecast capacity deficit. Furthermore, it is in the best interest of customers that this Project be approved and executed promptly, ensuring the Company has access to the required capacity resources in a timely manner.

12

13 To that end, Maritime Electric is seeking Commission approval for a capital expenditure deferral

14 of up to \$12 million of the total Project cost to complete the associated upfront engineering design

⁹⁶ This capacity deficit assumes no short-term capacity will be available to purchase from NB Power.

Appendix B.

⁹⁷ Each component is scheduled to be commissioned in December to allow it to serve as capacity for that winter season (December to February, inclusive). As the Company experiences its peak during the winter season, failure to commission a capacity resource in December results in that resource not contributing towards the Company's capacity obligations for that season.

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BESS

 To allow for commissioning of the BESS in December 2028, the sitework and installation of equipment must begin in the spring or summer of 2028. It is expected that specific BESS equipment, such as the battery and inverter modules, will have lead times of approximately one year from the time of order. Other electrical components associated with integrating the BESS 6 into a substation are expected to have lead times of approximately 18 months.^{[98](#page-72-0)} Therefore, long- lead items must be ordered before January 2027. Before such equipment can be ordered, upfront engineering must be completed and Regulatory, Environmental and Development approvals and 9 permits must be received.^{[99](#page-72-1)}

CT4

 To allow for commissioning of CT4 in December 2029, the sitework and installation of equipment must begin in the fall of 2028 or spring of 2029. It is expected that items, such as the turbine and generator, will have lead times of up to two years. Other electrical components, such as breakers, switchgear and transformer, are expected to have lead times of up to three years. Therefore, long- lead items must be ordered before July 2026. Before such equipment can be ordered, upfront engineering must be completed and Regulatory, Environmental and Development approvals and permits must be received.

RICE Plant

 To allow for commissioning of the RICE plant in December 2030, the sitework and installation of equipment must begin in the fall of 2029 or spring of 2030. It is expected that items, such as the RICE units and generators, will have lead times of up to two years. Other electrical components, such as breakers and transformers, are expected to have lead times of up to three years. Therefore, long-lead items must be ordered before July 2027. Before such equipment can be ordered, upfront engineering must be completed and Regulatory, Environmental and Development approvals and permits must be received.

⁹⁸ Depending on the final arrangement, additional equipment, such as a transformer (distribution voltage to transmission voltage), breaker(s) and switchgear may be required. Deliveries of such equipment could require up to three years for delivery and could impact the date of commissioning of the BESS. The final arrangement will be a deliverable of the upfront engineering.

⁹⁹ Before equipment can be ordered, quotes must be received, and terms and contracts must also be negotiated.

 The proposed timelines are aggressive; however, even with the aggressive timelines, the forecast capacity deficit, as presented in Section 7.1, is not fully addressed until 2031 following the completion of the RICE. The proposed timelines recommend that the Company start ordering long-lead items in the summer of 2026, which requires prior approvals from the Commission.

 Maritime Electric believes that the first step in obtaining Commission approval is to establish the urgent need for at least 150 MW of on-Island dispatchable generating capacity. Additionally, 8 Maritime Electric considers it in the best interest of customers to add this 150 MW of capacity as soon as possible. Therefore, the Company proposes to arrange a technical session with the Commission and Maritime Electric's consultant, S&L, at the earliest opportunity. The purpose of this technical session would be to assist the Commission in evaluating the urgent need for additional on-Island dispatchable generating capacity and to review the Company's proposed capital expenditure deferral of up to \$12 million. This deferral would be used to complete upfront engineering design work and issue RFPs for the Project. If the upfront engineering design work is not completed by the end of 2025, the Company will be unable to meet the proposed schedules.

7.0 PROJECT JUSTIFICATION The On-Island Capacity for Security of Supply Project is required to meet Maritime Electric's service obligation to its customers, who are currently exposed to financial and reliability risks due to increased customer load outpacing the available capacity resources. These risks are expected to continue until additional on-Island generating capacity resources are installed. The Project is justifiable because it will: **■** result in estimated savings of approximately 20 per cent over the useful life of the Project components compared to purchasing capacity from off-Island resources (as described in Section 6.4.3), which is a financial benefit for customers; **•** reduce exposure to regional capacity shortages, which is a reliability benefit for customers; **·** limit exposure to Interconnection transfer limitations or curtailments from the NB system, which is a reliability benefit for customers; **•** allow the Company to supply a larger portion of its customer load during significant curtailments or a disconnection from the mainland, which is a reliability benefit for customers; **•** provide voltage support during periods of high customer load and transmission system outages, which is a reliability benefit for customers; **·** decrease exposure to the capacity market prices, which is a financial benefit for customers; and ▪ increase the Company's ability to backstop renewables, specifically to respond to Hold- to-Schedule directives from the New Brunswick Transmission System Operator ("NBTSO"), which is a reliability benefit for customers. This will also support additional renewable energy resource development on PEI, which is an environment benefit for customers. Maritime Electric commissioned S&L to complete a CRS that assessed various capacity resource options. The study recommended adding 125 to 150 MW of on-Island capacity resources using a combination of CT, RICE and BESS to address the Company's capacity deficit.

 The annual cost of new on-Island dispatchable generation is currently higher than that of existing off-Island capacity purchases. However, due to an anticipated regional capacity shortage in the 1 near future, the future cost to purchase off-Island capacity is expected to surpass the cost of the

2 Project. Additionally, on-Island generation will not be subject to mainland transmission system

- 3 curtailments, making on-Island generating capacity resources more reliable than off-Island
- 4 capacity resources.
- 5
- 6 Detailed justification for the Project is described in more detail in this Section.
- 7

8 **7.1 Proposed Capacity Resources Forecast**

- 9 Table 15 shows the updated CRAA with the addition of the proposed new on-Island capacity
- 10 resources. The Table shows that the Project reduces the forecast capacity deficit starting in 2029
- 11 and eliminates the forecast capacity deficit in 2031 and 2032.
- 12

TABLE 15													
Capacity Resource Adequacy Assessment													
On-Island Capacity for Security of Supply Project and Existing EPA Projected into Future													
(MW)													
	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033			
Forecast Capacity													
Requirements	340	386	398	403	408	415	424	435	444	454			
(from Table 9)													
Capacity Resources													
Point Lepreau	29	29	29	29	29	29	29	29	29	29			
NB Power firm capacity purchases ^a	180	185	190	190	190	190	190	152	161	190			
NB Power short-term capacity purchases	19		٠	$\overline{}$	-			$\overline{}$		-			
Wind ELCC	23	23	30	30	30	30	30	30	30	30			
CT ₁	15	15	15	15	15	15	15	$\overline{}$					
CT ₂	25	25	25	25	25	25	25	25	25	$\overline{}$			
CT ₃	49	49	49	49	49	49	49	49	49	49			
BESS	$\overline{}$	\blacksquare	$\overline{}$	$\overline{}$	ä,	10	10	10	10	10			
CT ₄	$\overline{}$	\blacksquare	٠	\blacksquare	٠	\blacksquare	50	50	50	50			
RICE	\blacksquare		٠					90	90	90			
Total capacity resources	340	326	338	338	338	348	398	435	444	448			
Capacity deficit	$\overline{}$	(60)	(60)	(65)	(71)	(67)	(26)	$\overline{}$		(6)			
Status quo capacity deficit (per Table 10)	$\overline{}$	(60)	(60)	(65)	(71)	(77)	(86)	(112)	(121)	(156)			

13 a. NB Power capacity purchases are forecast to be reduced in 2031 and 2032 to avoid a surplus in capacity 14 resources.

15

 Even with the addition of the Project's proposed capacity resources, a capacity deficit of 6 MW is expected in 2033. The forecast capacity deficit in 2033 and beyond is not addressed as part of this Application as efforts to address the forecast capacity deficit in Eastern Canada may present other options.

 Figure 20 shows a graphical representation of the updated CRAA if the Project is approved as proposed. The Figure demonstrates that the Project is expected to increase the amount of on- Island capacity resources to 50 per cent of the Company's capacity requirement, which is closer to the 2015 levels of 77 per cent of the system peak, and aligns with the 50 per cent recommendation from the CRS.

7.2 Risks of Increased Dependence on Off-Island Capacity Purchases

14 In recent years, Maritime Electric's capacity requirements have exceeded its contracted capacity resources. However, the Company was able to secure incremental capacity by purchasing short- term capacity from NB Power, as demonstrated in 2024 in Table 10 and Table 15. Short-term capacity may continue to be available in the near-term; however, there is considerable reliability risk associated with continuing to rely on off-Island capacity purchases as the Company's capacity requirement increases. The reliability risk is associated with: (1) expected regional capacity

1 shortages; (2) firm transfer capacity limits; and (3) potential disconnections from the mainland. 2 These three reliability risks are discussed in the following sections.

3

4 **7.2.1 Regional Capacity Shortages**

 The demand for capacity is increasing throughout Eastern Canada, while the availability of capacity is projected to decline due to Government of Canada mandates to retire or repurpose all coal-fired generating units by 2030. This is expected to result in regional capacity shortages. If the Company is unable to acquire the necessary incremental capacity from off-Island resources, it will have insufficient capacity resources to meet its obligations, resulting in significant risks of \cdot load shedding.^{[100](#page-77-0)}

11

12 The Government of Canada's mandate to eliminate coal-fired generating units by 2030 is 13 expected to eliminate approximately 482 MW (20 per cent) of the existing generating capacity in 14 Nova Scotia ("NS").^{[101](#page-77-1)} Two coal-fired units in NS and one in NB are expected to be repurposed 15 and converted to operate as peaking generators with alternate fuels.^{[102](#page-77-2)} Table 16 summarizes the 16 forecast capacity shortages expected in Eastern North America.

¹⁰⁰ Load shedding (i.e., controlled power outages or rotating blackouts) refers to intentionally disconnecting electricity customers to protect the power system during periods when demand exceeds the available supply. This can occur if insufficient generation is available, or if issues on the transmission system prevent the delivery of electricity (ISO-NE, 2024).

¹⁰¹ NS Power has announced plans to retire Point Aconi (171 MW) and Trenton (311 MW) and repurpose Point Tupper (154 MW) and Lingan (600 MW): [https://www.cbc.ca/news/canada/nova-scotia/nova-scotia-power-plans-to-burn](https://www.cbc.ca/news/canada/nova-scotia/nova-scotia-power-plans-to-burn-heavy-fuel-oil-1.6895930)[heavy-fuel-oil-1.6895930](https://www.cbc.ca/news/canada/nova-scotia/nova-scotia-power-plans-to-burn-heavy-fuel-oil-1.6895930) – CBC News, Nova Scotia Power plans to burn heavy fuel oil at phased-out coal plants.

¹⁰² NB Power has announced that it will likely convert Belledune to burn a yet-to-be-determined form of wood pellets: <https://www.cbc.ca/news/canada/new-brunswick/belledune-likely-survive-coal-2030-1.7249081> – CBC News, Belledune likely to survive the end of coal in 2030, N.B. Power hearing told.

1 a. [https://montrealgazette.com/news/local-news/quebec-companies-could-face-energy-shortages-for-next-10-](https://montrealgazette.com/news/local-news/quebec-companies-could-face-energy-shortages-for-next-10-years-fitzgibbon)

2 years-fitzgibbon – Montreal Gazette, Quebec companies could face energy-shortages-for-next-10-

2 Fitzgibbon.

2 [years-fitzgibbon](https://montrealgazette.com/news/local-news/quebec-companies-could-face-energy-shortages-for-next-10-years-fitzgibbon) – Montreal Gazette, Quebec companies could face energy shortages for next 10 years: Fitzgibbon.

b. <https://www.hydroquebec.com/data/a-propos/pdf/action-plan-2035.pdf> - Hydro Quebec, Towards a Decarbonized and Prosperous Québec Action Plan 2035 (Action Plan #3 Increasing our power generation capacity).

c. [https://www.newswire.ca/news-releases/quebec-government-unprepared-for-end-of-electricity-surplus-says-mei-](https://www.newswire.ca/news-releases/quebec-government-unprepared-for-end-of-electricity-surplus-says-mei-839394678.html)

[839394678.html](https://www.newswire.ca/news-releases/quebec-government-unprepared-for-end-of-electricity-surplus-says-mei-839394678.html) - Newswire, Quebec government unprepared for end of electricity surplus, says MEI.

d. https://www.nbpower.com/media/1492536/2023_irp.pdf – NB Power, 2023 Integrated System Plan, Pathways to a Net-Zero Electricity System (Section 9.4).

e. https://www.nspower.ca/docs/default-source/irp/2023-action-plan-and-road-map.pdf?sfvrsn=bcd3c747_1 – NS Power, Powering a Green Nova Scotia, Together, 2023 Evergreen Integrated Resource Plan.

12 f. <https://nlhydro.com/wp-content/uploads/2024/07/Power-the-Province.pdf.pdf> – Newfoundland and Labrador 13 Hydro, Powering the Province, 2024 Adequacy Resource Plan.
14 g. https://www.iso-ne.com/about/key-stats/markets#fcaresults – IS

14 g. <https://www.iso-ne.com/about/key-stats/markets#fcaresults> – ISO New England, Markets (Results of the Annual
15 Forward Capacity Auctions). Forward Capacity Auctions).

16

 The North American Electric Reliability Corporation's ("NERC") 2022-2023 Winter Reliability Assessment report further highlights the risk of load increases and capacity shortages in the Maritimes region. The report notes that "some areas [of the bulk power system] are highly vulnerable to extreme and prolonged cold weather and may require customer load-shedding

1 procedures to maintain reliability."^{[103](#page-79-0)} The report noted that during extreme cold events, the Maritimes region is likely to have the second-worst capacity reserve margin levels (after Texas) 3 out of all regions overseen by NERC.^{[104](#page-79-1)} The next report issued by NERC, its 2023-2024 Winter Reliability Assessment, was slightly more optimistic of the Maritimes region, noting that "peak demand [(i.e., system peak)] growth has been offset by additional resource capacity and import agreements for the upcoming winter, causing reserve margins to rise by over 2 percentage points compared to 2022," but cautioned that "demand [(i.e., customer load)] levels at the forecasted [system] peak can still strain the area's firm supplies and lead to operating mitigations or energy 9 emergencies."^{[105](#page-79-2)}

 Electrical systems in Atlantic Canada experience system peaks during the winter months. Due to their close geographical proximity, neighboring utility systems typically peak at similar times, as they experience similar weather and temperatures. Additionally, the utilities often share capacity resources throughout the year, leading to competition for capacity resources during shortages. The anticipated capacity shortages and competing needs among electric utilities in Atlantic Canada during extreme cold events are expected to impact Maritime Electric's ability to secure additional capacity from off-Island resources during these periods. Consequently, the Company's customers face the risk of load shedding or rotating blackouts for short or extended durations. The Company's reliance on off-Island capacity resources exposes its customers to increasing reliability risks associated with capacity shortages in Atlantic Canada and surrounding regions. In 2023, 64 per cent of Maritime Electric's capacity resources were imported from off-Island, which

 will increase as system peak increases until there is no more capacity available or the Company's Interconnection capacity transfer limit is reached. With projected capacity shortages throughout the region, the Company's best option to ensure it meets its capacity requirements is to install additional on-Island capacity resources.

https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2022.pdf – NERC, 2022-2023 Winter Reliability Assessment.

 Appendix D: Extreme Weather Event Capacity Impact – Addendum to December 2022 Maritime Electric Capacity Resource Study (page 20).

 https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2023.pdf – NERC, 2023- 2024 Winter Reliability Assessment.

7.2.2 Interconnection and Mainland Transmission System Limitations

 The CRAA in Section 5.4 shows an increasing, and eventually significant, capacity deficit if off- Island capacity purchases remain at the current EPA level of 190 MW. However, even if there were endless capacity resources available on the mainland, there would still be limitations on its delivery to PEI.

 Maritime Electric obtains energy and capacity from off-Island via the mainland transmission systems and the Interconnection. The capabilities of both the mainland transmission system and the Interconnection determine the amount of capacity that the Company can import to PEI. The term "transfer capacity limit" refers to the maximum firm capacity that the Company can import from off-Island, which is constrained by the most restrictive limit of either the Interconnection or the mainland transmission system.

 There are three operating conditions typically considered as part of Maritime Electric's evaluation of the Interconnection's transfer capacity limit: (1) normal operating conditions; (2) abnormal operating conditions; and (3) subsea cable outage conditions. The implications of the three conditions are discussed in this Section.

Normal Operating Conditions

 Under normal operating conditions, the mainland transmission system is currently capable of providing 300 MW of firm transfer capacity to the NB-NS/PEI Interface, all of which is currently dedicated to PEI. Coincidentally, the Interconnection also has an approximate 300 MW transfer 23 capacity limit, based on N-1 contingency analysis of the four subsea cables.^{[106](#page-80-0)} This results in a 300 MW firm transfer capacity limit for PEI, of which 10 per cent (30 MW) is reserved for the City 25 of Summerside and the remaining 90 per cent (270 MW) is reserved for Maritime Electric.^{[107](#page-80-1)} Maritime Electric's Point Lepreau capacity resource of 29 MW is delivered through the Interconnection, which leaves 241 MW (270 MW minus 29 MW) available for the purchase of additional off-Island capacity resources by Maritime Electric.

¹⁰⁶ The N-1 contingency analysis considers the loss of either Cable 1 or Cable 2, which would overload the remaining Cable 1 or 2 at import levels above 300 MW.

¹⁰⁷ The allocation is based on the ratio of each utility's contribution towards the average 12-month coincident peak demand for electricity. The current ratio is 90.5 per cent for Maritime Electric and 9.5 per cent for the City of Summerside. For the purpose of this Application, an approximate 90:10 split was used, which allocates 270 MW to Maritime Electric and 30 MW to Summerside.

 Figure 21 demonstrates the implications of this transfer capacity limit with an example of Maritime Electric utilizing the full 270 MW of available transfer capacity during a period in February 2023. The Figure shows a period of high hourly customer load (shown as the black line) with a peak load of 287 MW. Through the Interconnection, NB Power was able to provide a total of 241 MW after the inclusion of short-term capacity purchases (in addition to 29 MW from Point Lepreau, for 6 a total of 270 MW), requiring the remaining 17 MW to be provided on Island.^{[108](#page-81-0)} At the time, the hourly customer load reached 287 MW and renewable generation sources of generation supplied only 2 MW; the Company's CTs were required to generate the remaining 15 MW to supply the customer load.

 Maritime Electric had sufficient CT capacity in February 2023 to meet its customer load while using the maximum Interconnection transfer capacity available (270 MW); however, as customer load continues to increase, there may not be sufficient CT capacity on PEI. Figure 22 shows a projection of expected wind and solar energy generation and hourly customer load for the same period in 2031, based on the wind speeds, solar irradiance and hourly customer load experienced

 Per the EPA, NB Power was contractually obligated to supply Maritime Electric with 173 MW of capacity in 2023. Anything is excess of this contractual amount (i.e., short-term capacity) is entirely dependent on NB Power's ability to sell such capacity to Maritime Electric.

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 in 2023. This scenario assumes that NB Power will have capacity resources available to supply 241 MW to the Company (in addition to 29 MW from Point Lepreau). Hourly customer load for the 2031 period is forecast to peak at 395 MW, which is 108 MW higher than in 2023. This results in 125 MW (395 MW minus 270 MW) of capacity needing to be supplied on Island. Since renewable sources are projected to generate 9 MW during the peak hour and Maritime Electric's existing CTs have a capacity of 89 MW, a deficit of 27 MW is observed, which is equivalent to the supply of electricity to approximately 7,700 homes during system peak periods.

 Table 17 is an updated version of the CRAA in Section 5.4, and assumes 270 MW of off-Island capacity is available (i.e., 29 MW from Point Lepreau, 190 MW contracted through NB Power EPA, and 51 MW of additional mainland short-term capacity). It demonstrates that the Company will still be capacity deficient, even if there is an endless supply of capacity resources available in the region, due to the mainland and Interconnection capacity transfer limits of 300 MW. In this scenario, the capacity deficit is forecast to begin in 2025 at 4 MW, which is equivalent to the supply of electricity to approximately 1,100 homes during system peak periods, and increase to

- 1 105 MW by 2033, which is equivalent to the supply of electricity to approximately 30,000 homes
- 2 during system peak periods.
- 3

4 a. Point Lepreau (29MW) plus NB Purchases through EPA (190 MW) plus Short-Term Purchases (51MW) equals 5 270 MW, which is Maritime Electric's 90 per cent share of the import firm transfer capacity. 5 270 MW, which is Maritime Electric's 90 per cent share of the import firm transfer capacity.

6

 Figure 23 shows a graphical representation of the CRAA with the Company's transfer capacity limit of 270 MW maximized. The Figure shows an increasing reliance on off-Island capacity resources, but that an increasing capacity resource deficit still exists, even if the Company maximizes the transfer capacity limit.

Abnormal Operating Conditions

 Maritime Electric's Interconnection transfer capacity limit of 270 MW (under normal operating conditions) is periodically reduced for maintenance due to transmission constraints on the Interconnection, transmission constraints on the mainland or generation outages on the 6 mainland.^{[109](#page-84-0)} As a result, Maritime Electric's off-Island capacity resource purchases can be curtailed (i.e., limited or reduced). Advance notice of curtailment is provided for planned outages or limitations, but no notice is provided for unplanned outages or limitations. Customer load growth in NB, NS and PEI is resulting in more frequent curtailments due to insufficient transmission capacity.

 When Maritime Electric is curtailed, it must assess if and how this curtailment will impact its ability to provide continuous service to customers. The Company reviews its forecasted customer load and available capacity resources, including expected wind and solar generation, while considering the limits imposed to the Interconnection transfer capacity by the curtailment. If the reduced Interconnection transfer capacity plus available on-Island renewable energy generation is not

¹⁰⁹ Generation outages impact transmission system energy flows, and can impact transmission system capabilities, depending on the location of the generation outage.

 sufficient to fulfill the projected customer load, the Company operates its CTs to generate the difference.

 In recent history, curtailments have not limited Maritime Electric's ability to provide continuous service to customers, but, periodically, the margins have been very small. As the frequency of curtailments increase and the Company increasingly relies on off-Island capacity resources for a larger portion of its capacity requirement, the risk of capacity deficits during curtailment events increases.

Subsea Cable Outage Conditions

 The Interconnection's transfer capacity limit of 300 MW to Maritime Electric and the City of Summerside can also be reduced if there is an outage to any of the Interconnection's four subsea cables. The two original subsea cables (i.e., Cables 1 and 2) were installed in 1977 and are now 47 years old. If one of the subsea cables is out of service, Maritime Electric's Interconnection 15 transfer capacity limit is reduced from 270 MW to 162 MW.^{[110](#page-85-0)}

 Table 18 is an updated version of Table 10 in Section 5.4 with 162 MW of off-Island capacity available (29 MW from Point Lepreau and 133 MW from NB Power capacity purchases) due to one subsea cable out of service. The Table shows that the loss of one subsea cable results in significant capacity resource deficits. In this scenario, the capacity deficit in 2024 is 66 MW, which is equivalent to the supply of electricity to approximately 18,900 homes during system peak periods, and increases to 213 MW by 2033, which is equivalent to the supply of electricity to approximately 60,900 homes during system peak periods.

¹¹⁰ Based on the N-1 contingency analysis.

1

2 Figure 24 shows a graphical representation of the CRAA with one subsea cable out of service,

3 which limits the Company's Interconnection transfer capacity limit to 162 MW. The Figure shows

- 4 that, under this scenario, a significant capacity resource deficit exists.
- 5

1 **7.2.3 Disconnections from the Mainland**

 Maritime Electric purchases a significant amount of energy and capacity from NB Power. In 2023, the Company purchased 85.7 per cent of its energy supply and 64.4 per cent of its capacity from off-Island resources (i.e., Point Lepreau and NB Power). This reliance on off-Island resources means that the Company has insufficient on-Island capacity resources to meet customer needs if PEI's electrical system were disconnected from the mainland. Disconnection would result in an immediate collapse of electrical support and a total loss of renewable energy generation, regardless of its output at the time, and would lead to load shedding and rotating blackouts until 9 the mainland connection is reestablished.^{[111](#page-87-0)}

10

11 While the impact of a mainland disconnection on customers is high, the probability is low, and the 12 Company believes it is uneconomical and unreasonable to fully mitigate the risk of a mainland 13 disconnection.^{[112](#page-87-1)} Instead, the Company believes that increasing the on-Island generating 14 capacity by 150 MW, as proposed in this Application, helps mitigate the impacts of a mainland 15 disconnection.^{[113](#page-87-2)}

16

17 *Load Shedding Protocol*

18 The lack of sufficient dispatchable generation resources on PEI means that the Company can

19 only supply approximately 80 MW of customer load during a disconnection from the mainland.^{[114](#page-87-3)}

20 As such, the Company would have to shed load (i.e., undertake rotating blackouts) because 80

21 MW is insufficient to meet even the Company's lowest customer load levels.^{[115](#page-87-4)}

22

23 The Project's 150 MW of additional on-Island capacity would increase on-Island dispatchable

24 capacity from 89 MW to 239 MW, and would limit the likelihood and severity of rotating blackouts

¹¹¹ Impacts of disconnection on renewable energy generation operation is discussed in detail later in this section.

¹¹² There have been four disconnection events of varying duration since 2004, The most recent event took place on November 29, 2018 and lasted approximately 8 hours.

¹¹³ Installing 150 MW of on-Island capacity will bring the ratio of total on-Island capacity to capacity requirements back above 50 per cent, which aligns with historic levels and is one of the primary recommendations of the CRS provided by S&L.

¹¹⁴ Although the maximum output from the Company's combustion turbines is 89 MW, the turbines cannot be operated at full output during a disconnection event. The output must be reduced by approximately 10 per cent to allow for variations in load. The Company estimates that the average load that could be served is approximately 80 MW.

 115 Maritime Electric's lowest hourly customer load in 2023 was 106 MWh, which occurred on September 17th between 4 a.m. and 5 a.m.

- 1 during a mainland disconnection.^{[116](#page-88-0)} Figure 25 shows a histogram of Maritime Electric's 2023 hourly customer load (i.e., the frequency of each hourly customer load range during the year), which shows the maximum serviceable customer load with its on-Island capacity resources during a disconnection before (80 MW) and after (215 MW) the Project. The Figure demonstrates that, with the addition of 150 MW of on-Island capacity resources, a disconnection would result in rotating blackouts for only 18 per cent of the hours of the year (for 2023 customer load levels).
-

Loss of Electrical Support

 The Interconnection provides more benefits to the PEI electrical system than access to energy and capacity; being connected to the North American grid via NB Power's electrical system 12 provides electrical support and stability to the PEI electrical system. For example, the size of NB Power's electrical system provides stability to PEI's electrical system by absorbing changes in customer load and renewable energy generation throughout the day. The NB Power electrical system also provides sufficient fault current that allows the PEI electrical system's protection and

 The total generation of 239 MW would be operated at approximately 90 per cent, providing 215 MW, during a disconnection.

 control devices to function properly, a key safety measure that increases public safety of the electrical system. A disconnection from the mainland last occurred during an ice storm in 3 November 2018 and lasted approximately 8 hours.^{[117](#page-89-0)}

 During a disconnection from the mainland, Maritime Electric is forced to rely on on-Island capacity resources to absorb changes in customer load and renewable generation levels, stabilize the electrical system's frequency and voltage and provide fault current to allow the system's protection and control devices to function properly. However, generation resources are programmed never to exceed safe operating limits to protect the equipment from damage; therefore, generation resources will trip (i.e., shut down) prior to exceeding safe operating limits. Unfortunately, if CT3 were to trip during a disconnection from the mainland today, a subsequent loss of supply, voltage support and stability support would occur, which would result in a system 13 $collapse.¹¹⁸$ $collapse.¹¹⁸$ $collapse.¹¹⁸$

 Additional on-Island dispatchable generating capacity would increase the level of voltage support and stability, increasing the overall reliability of the system. Additional generation would also increase the diversity of generation resources available, meaning that the loss of a single generator may not result in a system collapse. The additional available fault current and increased ability to follow load or renewable generation output is also likely to allow the operation of at least a portion of renewable generation.

Loss of Renewable Energy Generation

 The Company has determined that, with PEI's current electrical system, on-Island utility-scale renewable generation cannot be used to supply load during a disconnection from the mainland. The existing level of on-Island dispatchable generation cannot provide adequate short circuit current at the wind farms to safely operate protection and control devices, or supply sufficient

¹¹⁷ Details on the historical frequency of mainland disconnections can be found in Section 2.2.3 of the S&L CRS (provided in Appendix C).

¹¹⁸ Voltage and current limits are placed on generators to ensure they do not produce too much internal heat or torque, which would lead to asset degradation or damage.

 system stability to support large renewable energy generation installations, especially during 2 adverse weather.^{[119](#page-90-0)}

 During a disconnection, the Company's existing CTs could adequately respond to normal renewable energy generation increases and decreases resulting from small changes in wind speed or cloud cover; however, the decreased system stability (i.e., system strength) when disconnected from the mainland means that system disturbances, such as faults or generator trips, would result in critical system instabilities, such as voltage drops or frequency deviations. Large voltage drops or frequency deviations could cause cascading generator trips, eventually resulting in system collapse. Considering that historical disconnections occur during adverse weather, the likelihood of faults and generator trips are elevated during mainland disconnection events.

 Additional on-Island dispatchable generation would support the electrical system by responding to customer load and system disturbances, while increasing the strength and stability of the system. Generator trips or system faults would have less ability to negatively impact system parameters, such as voltage or frequency, meaning that a portion of the on-Island renewable generation could operate, further increasing load-serving capabilities during a system event. This operation mode (dispatchable generation with renewable generation) would require further study and would likely require a dedicated grid control system.

7.2.4 Financial Risks

 Section 7.2.1 discusses the circumstances resulting in a regional capacity storage and the uncertainty regarding plans to install additional capacity in the region. In the absence of additional on-Island generating capacity, the Company will have to compete financially with neighbouring provinces to purchase available capacity.

¹¹⁹ Net-metered solar generation is different as it has enough geographic diversity that large variations in output are generally not experienced in a short timeframe, although high concentrations of rooftop solar in one particular area may cause some localized system strain.

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 Maritime Electric currently sources off-Island generating capacity from NB Power, which has 2 indicated it can supply the Company with current levels of generating capacity into the future.^{[120](#page-91-0)} However, NB Power has not committed to increasing generating capacity levels in the future and indicated that it will be capacity deficient by 2027 or 2030 under high or low electrification 5 scenarios, respectively.^{[121](#page-91-1)} In addition, the planned closures and repurposing of coal facilities by 2030, and limited opportunity to access capacity beyond NB, are likely to create capacity deficits in the entire Maritimes area, jeopardizing the area's ability to meet NPCC generating resource adequacy criteria.

9

10 It is unlikely that the region will operate under a capacity deficient scenario for an extended period.

11 NS has indicated its intention to install 300 MW of "fast-acting generation,"^{[122](#page-91-2)} and a recent study 12 completed for Newfoundland and Labrador Hydro ("NLH") recommended the addition of a 150 13 MW CT.^{[123](#page-91-3)} NB Power recently announced its intention to have a 400 MW natural gas plant 14 operational in the Moncton area by 2028.^{[124](#page-91-4)} Some projects could include spare capacity that may 15 become available, but the Company would need to compete financially with neighboring provinces 16 to purchase any spare capacity.

17

 In the past, Maritime Electric benefited from off-Island capacity purchases being less expensive than the cost to build new capacity resources on Island. Off-Island capacity was less expensive because it was predominantly sourced from legacy baseload generation assets. Electric utilities in the region are now planning the addition of renewable energy generation combined with energy storage as their main energy sources, and the primary purpose of dispatchable generation will

 120 As per Section 5.1.2, NB Power has indicated that it plans to continue to provide firm Capacity to Maritime Electric in the future.

¹²¹ Electrification scenarios refer to scenarios modelled with various levels of electrification.
¹²² NS has indicated that it will require new fast-acting, dispatchable generation by 2027

NS has indicated that it will require new fast-acting, dispatchable generation by 2027. NS's 2030 Clean Power Plan suggests its next step is to finalize technology choice, location and timing for 300 MW of fast acting generation: <https://beta.novascotia.ca/sites/default/files/documents/1-3582/nova-scotia-clean-power-plan-presentation-en.pdf> – Nova Scotia Department of Natural Resources and Renewables, Nova Scotia's 2030 Clean Power Plan (page 19).

¹²³ NLH has indicated that studies are ongoing and final technology, size and location are not finalized: <https://www.cbc.ca/news/canada/newfoundland-labrador/new-combustion-turbine-study-hydro-1.6987750> – CBC News, New combustion turbine could cost \$500M, but NLH stresses many options are being studied.

¹²⁴ NB Power has selected an unnamed firm to build a 400 MW natural gas generating plant in Scoudouc, about 20 km northeast of Moncton, and have it running by 2028: [https://tj.news/new-brunswick/exclusive-nb-power-plans](https://tj.news/new-brunswick/exclusive-nb-power-plans-big-new-natural-gas-plant-to-avoid-blackouts)[big-new-natural-gas-plant-to-avoid-blackouts](https://tj.news/new-brunswick/exclusive-nb-power-plans-big-new-natural-gas-plant-to-avoid-blackouts) - Telegraph Journal, NB Power plans big, new natural gas plant to avoid blackouts.

 change from baseload generation to back-up generation, similar to the operation of Maritime Electric's dispatchable generation sources.

 The most common type of new dispatchable generation will be CTs and RICE plants. As the cost to source and install these units will be relatively similar across Atlantic Canada, the cost of purchasing additional capacity from off-Island resources is expected to be comparable to the cost 7 of building additional on-Island generating capacity resources.^{[125](#page-92-0)} Relying on the purchase of additional off-Island capacity resources exposes customers to the risk of increasing capacity costs in the future, especially as the demand for capacity in Atlantic Canada increases. Alternatively, investing in additional on-Island capacity will fix (i.e., secure) the cost of the associated capacity over the useful life of the asset.

7.3 Renewable Backstopping Requirements

14 The NBTSO acts as the balancing authority for the entire Maritime region.^{[126](#page-92-1)} Within the NBTSO balancing region, there are smaller system operators, such as the Maritime Electric System Operator, that are responsible for scheduling energy imports and exports from their service territory. The Maritime Electric System Operator receives hourly generation forecasts from all on- Island generation sources (including renewable energy generators), estimates hourly customer load for PEI and subsequently schedules (i.e., forecasts) the necessary energy imports from or exports to the NBTSO.

 Maritime Electric's hourly customer load is relatively predictable (i.e., easy to forecast); however, combining it with the variability of renewable energy generation to forecast energy imports and 24 exports through the Interconnection is increasingly difficult.^{[127](#page-92-2)} As weather systems move across PEI, wind speed and cloud cover can change quickly, which impacts wind and solar energy generation. When renewable energy generation production decreases quickly, PEI must import

 The cost of capacity is primarily based on fixed costs of generation, as non-fixed costs for generation are typically associated with energy, not capacity.

¹²⁶ The NBTSO is responsible for ensuring the amount of energy produced and imported to/exported from the region is equal to the load within the region. It requires submission of day-ahead schedules to ensure that there is appropriate generation capability available and hour-ahead schedules to fine-tune the system and adapt to current system conditions.

¹²⁷ Predicting hourly energy imports or exports is becoming more difficult with more than 40 MW of net-metered solar now installed on the system, along with a 10 MW of utility-scale solar farm and 92 MW of wind generation under contract with Maritime Electric. As this generation source ramps up and down the resulting requirement for energy import or exports does the opposite.

 additional energy from NB Power, which results in the amount of energy imported being significantly more than what was initially scheduled by the Maritime Electric System Operator. If this causes contractual or system operational issues on the mainland, the NBTSO may issue a Hold-to-Schedule directive to the Maritime Electric System Operator.

 During Hold-to-Schedule events, PEI must operate its dispatchable generation resources or 7 decrease its customer load to maintain the previously scheduled import level.^{[128](#page-93-0)} Currently, Hold- to-Schedule directives are managed by on-Island dispatchable generation resources. This means that, when energy imports are limited to the previously scheduled level, the resulting energy shortfall can be supplied by the Company's CTs and customer load is not impacted. The Company refers to this type of operation as renewable backstopping. A typical renewable backstopping operation lasts until the end of the scheduling hour, as import schedules for the following hour are updated to reflect current system conditions.

 The number of Hold-to-Schedule directives are increasing, driven by more frequent periods when there is insufficient excess energy available from NB Power to accommodate periods of lower- than-expected renewable energy generation on PEI. During the five-year period from 2019 to 2023 there were 173 Hold-to-Schedule directives requiring the operation of on-Island CTs to maintain previously scheduled import levels.

 There are currently 276 MW of renewable energy generation sources located on PEI: 203 MW of 22 wind energy generation and approximately 73 MW of solar energy generation.^{[129](#page-93-1)} In addition, there are 340 MW of renewable generation projects presently requesting to connect to Maritime Electric's system, as detailed in Table 2 and Table 4 in Section 5.1.2. If all requested projects proceed, there will be a total of 616 MW of renewable energy generation on PEI, comprised of 26 339 MW of wind energy generation and 277 MW of solar energy generation.^{[130](#page-93-2)} A 340 MW increase in renewable energy generation (i.e., 616 MW minus 276 MW), without any increase in

¹²⁸ Neighbouring utilities also schedule energy from the NBTSO, which can limit Maritime Electric's ability to increase its import levels.

¹²⁹ 21 MW at Summerside Sunbank, 10 MW at PEIEC Selmon Park and approximately 42 MW of net-metered solar generation. The net-metered solar generation total is approximate because net-metered solar is continuously being added to the system. Currently, there is approximately 1 MW of net-metered solar added to the system per month.

¹³⁰ The total additional net metered solar generation added to the system between now and then would be in addition to the total renewable energy generation of 616 MW.

- 1 on-Island dispatchable generating capacity, will result in shortfalls beyond the Company's ability
- 2 to supply during Hold-to-Schedule events, resulting in the need for customer load shedding.
- 3
- 4 Figure 26 shows actual hourly renewable energy generation compared to what was scheduled
- 5 (i.e., forecast) on April 25, 2024. The Figure shows that actual renewable energy generation was
- 6 significantly lower than forecast, which resulted in a 46 MW shortfall.^{[131,](#page-94-0)[132](#page-94-1)}
- 7

8

10 based on 2024 weather and assuming that the renewable energy generation projects requesting

- 11 to connect to Maritime Electric's system proceed.^{[133](#page-94-2)} With 341 MW of additional wind and solar
- 12 generation, a 107 MW shortfall is forecast, compared to the 46 MW shortfall experienced in 2023.
- 13 Maritime Electric's current 89 MW of on-Island dispatchable generating capacity is not large
- 14 enough to accommodate a 107 MW shortfall; additional on-Island dispatchable generating

⁹ Figure 27 shows a forecast for renewable energy generation for the same period in April 2028,

¹³¹ The shortfall experienced in April 2024 did not result in the operation of Maritime Electric's CTs due to the availability of capacity from NB Power, but serves as an example. Additional NB Power capacity is not always available.

¹³² Renewable generation varies continuously; a shortfall of 46 MW means a shortfall of 46 MWh within a 1-hour period.

¹³³ Figure 27 assumes that the 32 MW solar projects proposed for Charlottetown and Mount Pleasant, which did not provide an in-service-date in Table 3 found in Section 5.1.2, are in service by 2028.

capacity resources are required to accommodate the expected wind and solar energy shortfalls

- by 2028.
-

7.4 Impacts of Customer Load Shedding

 Customer load shedding is required when there is insufficient generating capacity to serve customer load, in which case some customers need to be "turned off." As an increasing number of PEI residents transition to using electricity as their primary (or worse, their only) heat source, customer load shedding due to a capacity shortage during extreme cold temperatures poses significant risks for personal health and safety and property damage. There have been several recent events across North America where customer load shedding was or was almost required, as summarized in this section.

January 2014: Newfoundland and Labrador

 In January 2014, customers in Newfoundland experienced sporadic and rotating blackouts over seven days, resulting in up to 200,000 customers without power at a time. The resulting review by the Public Utility Board of Newfoundland and Labrador found that "there had been insufficient generating capacity on the island interconnected system, and suggested NLH was to blame for 1 improper upkeep at the Hardwoods CT, the Stephenville turbine, and the Holyrood Unit 3 2 generator."^{[134](#page-96-0)}

3

4 *February 2021: Texas*

 In February 2021, extreme cold in Texas resulted in high customer load, causing disruptions to generators and supply of natural gas, widespread power outages and water shortages. The crisis resulted in billions of dollars in damage and the deaths of 246 people, two-thirds of whom died 8 from hypothermia.^{[135](#page-96-1)}

9

10 *February 2023: Eastern Canada Polar Vortex*

 In February 2023, a polar vortex weather event resulted in record high customer load on PEI and throughout Eastern Canada. High customer load resulted in significant stress on the electrical 13 system, with PEI reaching a record high system peak of 395.7 MW.^{[136](#page-96-2)} During the event, wind generation on PEI dropped significantly, as both the cold temperatures and high wind speeds caused wind turbines to shutdown. NB Power was able to provide imports with minimal curtailment; however, NB declared an Energy Emergency Alert Level 2, which indicates that it 17 was at serious risk of being unable to meet its firm load commitments.^{[137](#page-96-3)} Quebec also declared an Energy Emergency Alert Level 2 and curtailed electricity exports to NB. Fortunately, NB was able to import energy from New England and Newfoundland and Labrador via NS, which helped avoid customer load shedding. Had these imports been unavailable to NB, it is likely that it would have curtailed electricity exports to PEI, which would have resulted in customer load shedding in 22 the province. 138

23

24 *January 2024: Alberta*

25 In January 2024, the Alberta Electric System Operator ("AESO") issued an urgent appeal to 26 Albertans to conserve electricity, resulting in a 200 MW reduction in customer load and allowing

¹³⁴ Appendix D: Extreme Weather Event Capacity Impact - Addendum to December 2022 Maritime Electric Capacity Resource Study (page 5).

¹³⁵ Appendix D: Extreme Weather Event Capacity Impact - Addendum to December 2022 Maritime Electric Capacity Resource Study (page VI).

 136 This system peak was 22 per cent higher than the previous record peak, which was set in 2022.

¹³⁷ Energy Emergency Alert Level 2 is based on NERC standards and indicates that the Balancing Authority (in this case, NB Power) is no longer able to provide its expected energy requirements. In Energy Emergency Alert Level 2 firm capacity purchases are no longer guaranteed.

¹³⁸ Appendix D: Extreme Weather Event Capacity Impact - Addendum to December 2022 Maritime Electric Capacity Resource Study (page IV).

the region to avoid rotating blackouts.^{[139](#page-97-0)} In April 2024, tens of thousands of Alberta households 2 lost power as a shortage of generation prompted the AESO to cut usage.^{[140](#page-97-1)} The January event was triggered by low renewable production coinciding with high customer load, and the April event was triggered by two natural gas plants tripping off. The AESO has stated that new generating facilities with a combined capacity of 1,800 MW are forecast to come online in 2024 and should 6 remove the risk of rotating blackouts in the future.^{[141](#page-97-2)}

7.5 Synchronous Condenser

 This section discusses a secondary benefit of additional on-Island dispatchable generating capacity, reactive power support, through the use of a CT as a synchronous condenser. A synchronous condenser is an electric generator acting as a motor that is synchronized to the electrical system to provide reactive power support. Its purpose is to improve system stability and maintain voltages within desired limits under changing customer load conditions and contingency situations.

 Typically, synchronous condensers are initially powered by a spinning turbine before they are synchronized to the electrical system, at which time a clutch disengages the turbine from the generator. Once the turbine is disengaged, it is no longer required for the operation of the synchronous condenser, so it shuts down and stops consuming fuel. The generator, however, continues to rotate at its rated (i.e., synchronous) speed. The Maritime Electric System Operator can then control the generator's electrical field by adjusting a voltage regulator to either generate or absorb reactive power, which impacts the electrical system's voltage. It is possible to use the generator included with a CT as a synchronous condenser provided the CT is designed to operate as such.

<https://www.aeso.ca/aeso/media/aeso-thanks-albertans-for-quick-response-to-call-for-power-conservation/> AESO, AESO Thanks Albertans for Quick Response to Call for Power Conservation.

 [https://www.cbc.ca/news/canada/edmonton/rotating-brownouts-leave-thousands-of-albertans-without-power](https://www.cbc.ca/news/canada/edmonton/rotating-brownouts-leave-thousands-of-albertans-without-power-friday-1.7165290)[friday-1.7165290](https://www.cbc.ca/news/canada/edmonton/rotating-brownouts-leave-thousands-of-albertans-without-power-friday-1.7165290) - CBC News, Rotating brownouts leave thousands of Albertans without power.

 [https://www.cbc.ca/news/canada/edmonton/province-did-everything-it-could-to-prepare-for-winter-surge-in](https://www.cbc.ca/news/canada/edmonton/province-did-everything-it-could-to-prepare-for-winter-surge-in-power-demand-minister-says-1.7083882)[power-demand-minister-says-1.7083882](https://www.cbc.ca/news/canada/edmonton/province-did-everything-it-could-to-prepare-for-winter-surge-in-power-demand-minister-says-1.7083882) – CBC News, Province did everything it could to prepare for winter surge in power demand, minister says.

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 Synchronous condensers provide additional benefits over other voltage control equipment (e.g., capacitors and reactors) as they provide stepless control and inertia to the system, increasing stability and reliability.

 Maritime Electric currently relies heavily on the Interconnection to provide much of its reactive 6 power support.^{[142](#page-98-0)} However, as the Company's system peak continues to increase, a source of dynamic reactive power support will be required in central or eastern PEI to support high customer loads in those areas, especially during transmission system outages.

 Synchronous condensers and conventional generators contain heavy spinning rotors that provide significant system inertia, which enables them to maintain operation during system disturbances, such as system faults or customer load and generation fluctuations. In contrast, inverter-based generators, such as solar energy generators and modern wind energy generators, use electronic 14 devices to convert direct current ("DC") electricity to alternating current ("AC") electricity.^{[143](#page-98-1)} These electronic devices do not provide system inertia; rather, they have control algorithms which are set to follow the grid voltage and trip the generator if the system parameters are outside of tolerance. This means that small system disturbances can cause inverter-based resources to operate abnormally or possibly trip, which consequently increases the impact of such an event. Operating a synchronous condenser provides the system with inertia, limiting the ability of that disturbance to impact system parameters, such as voltage. Inverter-based generators supported by a synchronous condenser can ride through small disturbances that it otherwise could not, preventing a cascading event that could result in significant loss of load. As the amount of inverter-based renewable energy generators increases on PEI, the need for additional system inertia will also increase. Installing a generator with a synchronous condenser will benefit the electrical system and help provide this future need.

¹⁴² The subsea cables between NB and PEI produce 146 megavolt-ampere reactive ("MVAR") of capacitance (a form of reactive power). The four 30 MVAR reactors installed in Bedeque and Borden can absorb most of this reactive power when it is not required by PEI. The Maritime Electric System Operator controls the supply of reactive power from the Interconnection by switching those reactors on and off as required. Approximately 65 per cent of Maritime Electric's load is located in or east of Charlottetown and localized dynamic reactive power support is required in this area at elevated load levels.

¹⁴³ Although older wind generators were not inverter-based, today, almost all renewable generation being added to the grid is considered inverter-based. There is approximately 70 MW of inverter-based generation currently connected to the PEI electrical system. As per Section 5.1.2, there are approximately 340 MW of utility scale inverter-based projects requesting access to the Maritime Electric transmission system.

1 There are two viable options to add synchronous condensing capability to PEI's electrical 2 system:^{[144](#page-99-0)}

- 3
- 4 1. include synchronous condensing capabilities with a new CT at an estimated cost of 5 **approximately \$7.0 million**;^{[145](#page-99-1)} or

6 2. install a stand-alone synchronous condenser, which is estimated to costs in excess of \$30 7 million, partially because it would require dedicated electrical equipment and a motor to 8 Spin the synchronous condenser up to speed.^{[146](#page-99-2)}

9

10 Both options would have similar equipment and electrical capabilities. The Company has included 11 Option 1 in the CT4 component of the Project as it is considerably less expensive. Without the 12 addition of a Synchronous Condenser, the Company will have to explore less resilient and reliable

- 13 forms of reactive power support, which could ultimately be more expensive.
- 14

15 **7.6 Capacity Resource Study**

 In 2022, Maritime Electric engaged S&L to complete a CRS, which is included in Appendix C. The CRS was a generation planning exercise that analyzed the Company's generating capacity requirements and options to meet those requirements. The CRS evaluated a variety of capacity resource technologies, developed cost estimates and provided recommendations for cost-effective technologies that could achieve Maritime Electric's capacity requirements.

21

22 In February 2023, two months after the completion of the CRS, large areas of eastern Canada,

23 including the Maritime provinces, experienced a polar vortex weather event. This event brought

¹⁴⁴ A third option to retrofit CT3 with a synchronous condenser, which is estimated by S&L to cost approximately \$13.4 million, and would require CT3 to be out of service for approximately nine months was also considered. However, due to the forecast capacity resource deficit and the reliability risks associated with removing CT3 for nine months, the Company does not recommend this option today. The addition of a clutch and synchronous condenser to CT3 may be a consideration once sufficient additional on-Island capacity has been added, in order to reduce customer reliability exposure to an extended CT3 outage.

¹⁴⁵ This is a class 4/5 estimate based on the AACE cost estimate classification system and assigned a probable accuracy range within 30 per cent. This cost is in 2024 dollars and is based on a USD to CAD exchange rate of 1.36.

¹⁴⁶ A February 2021 document from ISO New England indicated several synchronous condenser projects with varying costs but all projects are above \$30 million for a 50 MVAR synchronous condenser after USD to CAD conversion and inflation are accounted for: [https://www.iso-ne.com/static](https://www.iso-ne.com/static-assets/documents/2021/02/a6_dynamic_reactive_device_technologies.pdf)[assets/documents/2021/02/a6_dynamic_reactive_device_technologies.pdf](https://www.iso-ne.com/static-assets/documents/2021/02/a6_dynamic_reactive_device_technologies.pdf) – ISO New England, Looking Forward: Dynamic Reactive Device Technologies.

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 temperatures as low as -27°C (-43°C with the windchill) on PEI. The extreme cold led to record customer load on PEI and throughout Eastern Canada, significantly stressing electrical systems. As a result, Maritime Electric requested S&L to reevaluate the findings of the CRS and prepare an Addendum, which was completed in July 2023. The Addendum, which is included in Appendix D, provided revised recommendations, superseding those from the original CRS, based on the record customer load experienced in February 2023. References to the CRS in this Application reflect the updated recommendations provided in the Addendum. 8

9 Prior to the decommissioning of the Charlottetown Steam Plant in 2022, approximately 60 per 10 cent of Maritime Electric's capacity requirement was supplied by on-Island capacity resources.^{[147](#page-100-0)}

11 Currently, only 31 per cent of the Company's capacity requirement is supplied by on-Island

12 capacity resources, as illustrated in Figure 28.^{[148](#page-100-1)} During a period of increasing system peak, a

13 decrease in on-Island capacity results in an increasing risk that the Company will be unable to

- 14 provide continuous service to customers.
- 15

The average ratio of dispatchable on-Island capacity to peak load was 60 per cent during the five-year period between 2015 and 2019.

¹⁴⁸ The system peak experienced in 2023 was 359 MW and the Company's CTs provided 89 MW of capacity with the ELCC of wind providing another 22 MW, resulting in on-Island coverage of 31 per cent (i.e., $(89 + 22)$ / 359 = 31 per cent).

1 The CRS discussed Maritime Electric's increased reliance on off-Island capacity resources and 2 reviewed reliability risks, such as disconnection from the mainland events, that would result in 3 rotating blackouts, as discussed in Sections 7.2.3 and 7.4.^{[149](#page-101-0)} The CRS highlighted that relying on 4 off-Island capacity resources for more than 50 per cent of Company's capacity requirement 5 "leaves Maritime Electric customers exposed to significant financial and health/safety risks."^{[150](#page-101-1)} 6

 S&L also completed an analysis of 16 potential capacity resources as part of the CRS, which are summarized in Table 19. The CRS shortlisted eight of the technologies for further study as part of a first level screening, which are identified as "Selected" in the Table. The initial screening primarily considered whether the technology (1) had sufficient industry deployment to be considered an established technology and (2) whether the technology had an adequate supply of the required resource (e.g., fuel) for it to be a viable option on PEI.

13

TABLE 19 S&L Initial Capacity Resource Technology First Level Screening Results ¹⁵¹									
Technology Type	Significant Energy Industry Deployment?	Sufficient Renewable Resource?	Notes / Other Considerations	Initial Screening Results					
Onshore Wind Power	Yes	Yes	Widely used technology in energy industry, renewable technology	Selected					
Offshore Wind Power	Yes	Yes	Widely used technology in energy industry, renewable technology	Selected					
Solar PV (Utility Scale)	Yes	Yes	Widely used technology in energy industry, renewable technology	Selected					
Rooftop Solar PV	Yes	Yes	Widely used technology in energy industry, renewable technology	Selected					
Concentrating Solar Power (CSP)	Yes	No.	Renewable technology, but PEI's direct normal irradiance levels are not high enough and PEI's climate is not ideal to support a CSP plant	Not Selected					
Energy Storage (BESS, Li-Ion)	Yes	Not Applicable	Widely used technology in energy industry	Selected					

¹⁴⁹ S&L referred to rotating blackouts as "rolling blackouts." The two terms are interchangeable.

¹⁵⁰ Refer to page III of the S&L CRS provided in Appendix C. It should be noted that the CRS indicates that only a portion of the on-Island wind generation could operate during a disconnection from the mainland. Since the publication of this report, Maritime Electric conducted a thorough review of its system and has determined that during a disconnection the system is not strong enough to support any wind generation. Refer to Section 5.2.3 for more detail.

¹⁵¹ Table 19 is reproduced from Table 5-1 on page 60 of the CRS.

7.6.1 Comparison of Capacity Resource Technologies

 A summary of the detailed analyses and cost comparisons of each capacity resource technology that the CRS selected for secondary screening is provided in this section. The secondary screening considered the technology's ability to (1) contribute towards Maritime Electric's energy and capacity obligations, (2) provide support when PEI is disconnected from the mainland and (3) impacts on the Company's sustainability targets.

Onshore Wind Power

 From a power generation perspective, consistent and strong wind speeds are one of PEI's best resources; however, onshore wind power is not an effective capacity resource since ELCC decreases as a percentage of nameplate capacity as more wind generation is added, as 12 discussed in Section 5.1.2. Rather, onshore wind power is more effective as a supply of energy.^{[152](#page-103-0)}

 S&L developed a cost estimate for a 50 MW onshore wind power plant, which is provided in the 15 CSR.^{[153](#page-103-1)} The capital cost of onshore wind is estimated to be \$2,126/kW, which is reasonable; however, when the ELCC of additional wind resources at less than 10 per cent of nameplate 17 capacity is considered, the cost of capacity is 14 times more than a RICE plant.^{[154](#page-103-2)}

 Although onshore wind has excellent potential as a source of energy for PEI, it is not a useful or cost-effective source of capacity. For that reason, S&L did not include it in their recommendations.

Offshore Wind Power

Offshore wind power uses larger wind turbines that are erected offshore and can generate more

electricity with less intermittency due to more consistent winds offshore. While offshore wind

power typically has a higher capacity factor than onshore wind power, PEI's onshore wind power

¹⁵² For example the PEIEC's proposed 30 MW wind farm expected to be online in 2026 will only provide an additional 2.8 MW of generating capacity for the Company. As more wind is added to Maritime Electric's system, the relative percentage of that capacity which contributes to the ELCC will reduce further.

¹⁵³ The cost estimate located in Appendix A of the CSR, which is provided in Appendix C of this Application.

 The cost estimate of \$2,126 for onshore wind power was provide by S&L in 2022 and was based on industry average installation costs, not specific to PEI.

1 is very favourable in terms of wind speed and intermittency.^{[155](#page-104-0)} As a result, the expected capacity factor (i.e., levels of generation throughout the year) improvements of offshore wind power near

PEI are only modest.

 Offshore wind power is significantly more expensive than onshore wind power due to the challenges associated with installing wind turbines and associated infrastructure in water. S&L estimates that offshore wind power would cost between \$6,000/kW and \$8,000/kW, which is 8 three-to-four times more than onshore wind power on a per-kW basis.^{[156](#page-104-1)}

 For the same reason as onshore wind power, offshore wind power was not recommended as a capacity source.

Utility-Scale Solar Photovoltaic

 Utility-scale solar photovoltaic is a reasonable source of energy for PEI; however, Maritime Electric's system peak typically occurs on a cold day in January or February between the hours 16 of 5 p.m. and 6 p.m.^{[157](#page-104-2)} At that time, the sun has already set (i.e., solar generation is not producing energy) and solar generation cannot be relied upon; therefore, it cannot be counted as a capacity resource towards the Company's capacity requirements.

Rooftop Solar Photovoltaic

- Rooftop solar generation uses the same technology as utility-scale solar and does not produce
- energy during system peak periods in January and February after 5 p.m. Therefore, it too cannot
- be counted as a capacity resource towards the Company's capacity requirements.

 Capacity factor refers to the ratio of actual electricity generated over the course of a period of time compared to if the generator operated at maximum capacity for the same period. PEI's wind farms consistently achieve capacity factors above 40 per cent. National Renewable Energy Laboratory ("NREL") indicates that historical off-shore wind capacity factors have varied between 37 and 43 per cent over the past 10 years and projects future capacity factors between 45 and 50 per cent: https://atb.nrel.gov/electricity/2024/offshore_wind – NREL, Offshore Wind.

 A cost estimate of \$6,000/kW to \$8,000/kW for offshore wind power was provided in section 5.2.1.2 (page 64) of the original CRS and was based on industry average installation costs, not specific to PEI.

¹⁵⁷ PEI's wind farms consistently achieve capacity factors above 40 per cent making them a good source of energy for PEI. Solar farms are expected to achieve capacity factors between 12 and 17 per cent, making them a reasonable source of energy for PEI.

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Lithium-Ion Battery Energy Storage System

 A lithium-ion BESS differs from other alternatives discussed thus far in this section as it is not a generation resource, but instead stores energy generated by other sources. Also, the unique technical characteristics of a BESS allows it to act in ways that differ from generation technologies. For example, a BESS' ability to respond instantaneously to events on the power system makes it well suited to provide ancillary services, such as spinning reserve, load following and voltage support. The CRS estimated the capital cost for a 10 MW/40 MWh BESS to be \$2,714/kW (installed). Industry standards dictate that a BESS must have at least 4 hours of storage to be counted as a capacity resource.

A BESS has several capabilities or modes of operation, including:

• Energy mode: a BESS absorbs energy when surplus energy is available and it is not fully charged, and it can inject energy into the electrical system when energy is needed. The BESS freely charges and discharges according to the energy market or needs of the system. The concept of storing renewable energy for later discharge would fall under this mode of operation.

• Capacity mode: the BESS maintains its state of charge as high as possible in case it is required as a capacity resource. When the electrical system requires additional capacity the BESS discharges until the need for capacity is satisfied or the BESS is depleted. Then, the BESS is recharged as soon as the electrical system has sufficient excess capacity.

 ▪ Ancillary service mode: the BESS can provide system ancillary services, such as load 23 following, frequency regulation and spinning reserve, as required.^{[158](#page-105-0)} When operating in ancillary service mode, the Maritime Electric System Operator would need to relinquish control of the BESS to the NBTSO, acting as the balancing authority for the Maritime region.

 The capabilities of a BESS cannot be double counted, meaning that the same portion of storage cannot be used as an energy resource, capacity resource or ancillary service resource

The Company presently purchases load following, frequency regulation and spinning reserve from the NB Power System. Should these services be provided by a BESS, the Company would discontinue purchasing these products from NB Power.

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concurrently. However, nameplate capacity of a BESS can be divided into separate capabilities,

allowing portions of a BESS to operate in different modes. For example, a 10 MW/40 MWh BESS

- could be treated as two 5 MW/20 MWh BESS units. The first 5 MW portion could be operated as
- an energy resource while the second 5 MW portion is operated as a capacity resource.
-

 It is important to note that a battery's state of charge during a contingency event is not known. System contingencies often occur with no warning, and the state of charge when a contingency occurs significantly impacts its ability to provide support. Also, contingency events commonly last longer than 4 hours, meaning that a 4-hour BESS will not be able to provide full output for the 10 duration of the event.^{[159](#page-106-0)} The Maritime Electric System Operator would have to determine when and at what level to engage the BESS during a contingency event, which may prove to be a difficult task.

 In addition, the type of service provided by a BESS can change throughout the year. As Maritime Electric's need for capacity is highest when customer load is highest during the winter months, the Company can use a BESS as a capacity resource during the winter months and repurpose it as an energy resource or an ancillary services resource for the remainder of the year.

 While a BESS can be considered a useful capacity resource, it is more expensive as a capacity resource compared to a CT or RICE plant due to its lifespan. The estimated capital cost of a 4- hour BESS is \$2,714/kW, which is comparable to the estimated capital cost of a CT at \$3,120/kW or a RICE at \$2,710/kW. However, the expected lifespan of a CT and a RICE is approximately 50 years, which is more than twice the expected lifespan of a BESS at approximately 20 years. In addition, a BESS is subject to capacity degradation over its lifespan and requires periodic augmentation to maintain its nameplate capacity value. Augmentation costs can be up to 15 per 26 cent of the initial capital costs but depend significantly on the BESS' operating conditions.^{[160](#page-106-1)}

-
- A BESS that is operated as a capacity resource could provide some benefit to Maritime Electric's grid during a short-duration event where additional capacity is required (e.g., a disconnection from

The most recent disconnection from the mainland occurred in November 2018. It lasted approximately 8 hours, meaning the battery would only last half as long as the outage duration.

S&L estimated the augmentation costs of a 50 MW, four-hr battery to be \$19.8 million over its 20-year lifetime.

1 the mainland or a curtailment that lasts for less than 4 hours). If the event lasts longer than 4

- 2 hours, a BESS would no longer provide a benefit after it has been depleted.^{[161](#page-107-0)} However, a BESS
- 3 providing fast-acting grid services (i.e., ancillary services) could provide system benefits, such as
- 4 load following, for a longer duration during such an event.^{[162](#page-107-1)}
- 5

6 As a result of the multiple modes of operation of a BESS and the various benefits associated with 7 each mode, along with its estimated capital cost, S&L recommended this technology on a small 8 scale initially with a possibility of expansion in the future.

9

10 *Reciprocating Internal Combustion Engines*

 RICEs are a type of dispatchable generator that resembles a large car engine. They are common in the industry due to their modularity, operating flexibility and fuel flexibility. Natural gas and diesel are their most common fuel sources, but RICEs can also operate on renewable fuels, such 14 as biodiesel, ammonia and hydrogen.^{[163](#page-107-2)} According to S&L, some modification to the engine components are required to operate it with a drastically different fuel. For example, modifications would be required to convert a RICE that primarily consumes diesel and biodiesel to be capable of operating on hydrogen. In general, the variety of fuels compatible with a RICE helps reduce the risk associated with operating a RICE if diesel generation (by itself) is no longer permitted 19 under future regulations.^{[164](#page-107-3)}

20

21 The estimated capital cost of a RICE plant is \$2,710/kW. RICE technology has several 22 advantages compared to other capacity resources and Maritime Electric's existing CTs, through 23 its:

- 24
- 25 capability to operate on a wide variety of fuels and fuel blends;

¹⁶¹ This is a considerable drawback to a BESS when compared to a CT or Rice plant with seven days of fuel storage and the ability to supplement the fuel supply to extend the unit's operation even further.

¹⁶² A BESS providing load following during a disconnection would remove the variability from the load, allowing the dispatchable generating units to operate at higher output levels throughout a prolonged disconnection.

¹⁶³ Currently, RICE plants can operate on a blended mix of diesel/biodiesel or hydrogen/natural gas, but it is expected that RICE plants will be capable of operating on 100 per cent biodiesel, ammonia or hydrogen in the future.

¹⁶⁴ S&L state that traditional diesel and biodiesel are similar enough in composition that many of the most common RICEs available today can use both without needing significant modifications (some minor modifications would be required to allow for biodiesel firing).
- **1** consistent output that is independent of ambient environmental conditions;^{[165](#page-108-0)}
- 2 ability to operate at lower output levels than CTs, and superior efficiencies when operating 3 at lower output levels;^{[166](#page-108-1)}
- 4 availability in a variety of sizes up to 20 MW;
- 5 modularity, as RICE plants are typically made up of more than one unit, meaning that 6 maintenance can be performed on smaller individual units while the remaining units 7 remain available; and
- 8 ability to operate continuously at full output for extended periods.^{[167](#page-108-2)}
- 9

10 Maritime Electric has some experience operating small RICE "black-start" units.^{[168](#page-108-3)} While RICE 11 plants can provide energy with a capacity factor above 90 per cent, the energy produced by such

- 12 a plant would be expensive and potentially carbon-intensive, depending on the fuel used. For
- 13 these reasons, S&L recommended that a RICE plant be operated similar to the operation of the
- 14 Company's existing CTs as a peaking and backup capacity resource.
- 15

16 *Combustion Turbines*

17 CT technology is based on aeroderivative engines. The technology has many advantages as a

18 capacity resource, including that:

- 19
- 20 it is a mature technology that has been used in the industry for over 50 years;
- 21 **■** CTs are designed for quick start-up, and can go from start to maximum power in less than 22 10 minutes;
- 23 CTs have a small footprint and are relatively quiet, which makes them more favourable for 24 urban locations compared to other generating technologies;

¹⁶⁵ RICE output is independent of ambient air conditions (i.e., temperature, humidity and pressure (primarily related to elevation)), while the output from CTs varies based on those same ambient air conditions. For example, CT3 has an output of 49 MW during winter conditions, but the output during warm summer conditions is reduced to 35 MW. However, an 18 MW RICE would be capable of outputting 18 MW under all conditions.

¹⁶⁶ Operationally, this means that if system conditions require 2 MW of dispatchable generation, a RICE can provide 2 MW. By comparison, CTs, such as CT3, have a minimum load level of 15 MW. If only 2 MW is required, the system operator must dispatch the CT at 15 MW and reduce another source by 13 MW. As CT energy is typically more expensive than other sources, running CTs above the needed level is financially disadvantageous.

¹⁶⁷ The Company intends to provide adequate fuel storage to operate the RICE plant at full output for seven days. During an extended run, fuel delivery can be scheduled to allow the plant to continue to run beyond seven days.

¹⁶⁸ The City of Summerside also maintains seven individual RICEs varying in size from 1.0 to 4.2 MW, and its oldest unit was first commissioned in 1950.

- if equipped with a synchronous condenser, the CT's generator can disengage from the 2 turbine and synchronize to the grid to provide reactive power support without requiring fuel consumption;
- \blacksquare \blacksquare \blacksquare CTs can operate continuously at full output for extended periods:^{[169](#page-109-0)} and
- CTs have flexible fuel capabilities, which means they can operate on renewable fuels with appropriate upfront design or modifications.
-

 CTs have similar capacity factors as RICEs and can operate on fuels such as diesel and natural gas. They have less fuel flexibility than RICEs, as the fuel standards for CTs are more stringent.

They also have a higher minimum output level than RICEs, meaning they produce more than

- required if only small amounts of capacity are needed.
-

 As diesel is currently the best fuel source for on-Island CTs, the cost of energy produced by this technology will be high. However, CTs are well-suited as a capacity resource operating only in peaking and backup situations, similar to the operation of the Company's existing CTs.

The estimated capital cost of a 50 MW CT is \$3,120/kW.

 CTs are a dispatchable generating resource that are flexible (i.e., they can start, stop and ramp quickly), cost effective and very common in the industry. Maritime Electric has experience operating CTs, as its current generating fleet is entirely made up of CTs. Similar to RICE plants, CTs can provide reliable capacity and energy; however, the energy produced by such CTs would be expensive and potentially carbon-intensive, depending on the fuel used. For these reasons, S&L recommended including a CT in the project to be operated as a peaking and backup capacity resource, similar to the operation of the Company's existing CTs.

Biomass Power Plant

- Biomass power plants burn biomass (e.g., wood) to produce electricity. The estimated capital cost
- 29 of a biomass power plant is \$5,856/kW.^{[170](#page-109-1)} In addition, biomass power plants have high operating

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¹⁶⁹ The Company intends to provide adequate fuel storage to operate the CT at full output for seven days. During an extended run fuel deliveries can be scheduled to allow the plant to continue to run beyond seven days.

¹⁷⁰ The cost estimate of a biomass power plant was provided by S&L in 2022 and was based on industry average installation costs and is not specific to PEI.

1 costs due to the amount of fuel and the number of personnel required to operate it. There is also

- 2 a lack of long-term biomass fuel supply on PEI, as biomass power plants require significant wood
- 3 resources and land mass for consistent long-term fuel supply. At this time, a biomass power plant
- 4 is not considered a viable capacity resource based on its upfront costs and long-term fuel supply
- 5 availability.
- 6

7 As a result of the high capital cost and the lack of long-term fuel source on PEI, S&L did not

8 recommend a biomass power plant as a capacity resource.

9

10 *Summary of Technologies*

- 11 A summary of the shortlisted technologies is included in Table 20.
- 12

13 a. S&L estimated the capital cost on a per kilowatt basis for a 50 MW onshore wind plant to be \$2,126. Due to the reduced ELCC for additional wind resources on PEI a 50 MW wind plant will only result in additional 2.8 M 14 reduced ELCC for additional wind resources on PEI a 50 MW wind plant will only result in additional 2.8 MW of Capacity. $$2,126/kW \times 50 \text{ MW}/2.8 \text{ MW} = $37,964 \text{ per kW of additional capacity.}$

b. The reduced ELCC for a 50 MW offshore wind plant would only result in an additional 3-4 MW of Capacity resulting

18 c. As solar provides no additional capacity value, a cost per kW of additional capacity is irrelevant.

17 in a very high cost on a per kW of additional capacity.

18 c. As solar provides no additional capacity value, a cost

19 d. A BESS has an expected operational life of 20 years

20 operate reliably for up to 50 years. d. A BESS has an expected operational life of 20 years while CTs, RICEs and biomass plants would be expected to operate reliably for up to 50 years.

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7.6.2 Capacity Resource Study Findings and Recommendations

 S&L's final recommendations, as detailed in the CRS, indicate that additional capacity resources are needed today. Providing additional on-Island dispatchable generation represents the most practical means for the Company to meet its capacity obligations and it:

 ▪ protects customers from future regional capacity shortfalls and the associated capacity market price exposure resulting from increased customer load and the impending closure of coal-fired generating units in the region;

- reduces risk to personal health, safety and property damage due to shortage of supply during cold weather events;
- **•** increases the Company's ability to serve customer load during a disconnection from the mainland or severe curtailment events;
- **•** supports additional renewable energy resource development on PEI by providing ancillary services and renewable backstopping support;
- provides voltage support to the PEI electrical system during periods of high load and during transmission system outages; and
- **•** improves the Company's proportion of on-Island capacity resources as a percentage of 18 its capacity requirement, which was 60 per cent from 2015 to 2019 (on average) and is expected to decrease to 17 per cent by 2033.
-

 S&L also indicated that BESS, CT and RICE are the most appropriate and practical technologies for additional capacity given Maritime Electric's current operating conditions. The combination was selected for the specific advantages of each of the three selected technologies and to help diversify Maritime Electric's capacity resources. The advantages of each of the selected technologies that are most relevant to the PEI electrical system are:

• BESSs have increased flexibility; they can be utilized as a capacity resource or as fast- acting grid services (i.e., ancillary services), both of which are currently being sourced from off-Island resources. The ability to provide both capacity and ancillary services results in increased financial benefits for a moderately sized BESS. The BESS also has good potential to provide additional services in the future, such as energy arbitrage or helping the Company ensure renewable energy generated on PEI can be consumed on PEI.

 BESS is also a technology that is actively being developed and increasingly installed 2 throughout the world; therefore, installing a moderately sized BESS will provide insights for the Company for potential future projects.

- CTs offer the best opportunity to significantly and promptly increase the Company's on- Island capacity. Additionally, they enable the cost-effective inclusion of a synchronous condenser, which is necessary for providing dynamic system stability and support.
- RICEs provide the most cost-effective opportunity to increase the Company's on-Island capacity to the required level while achieving multiple added benefits. It will provide improved operating efficiencies when operating at lower output levels or during warmer weather, which allows the Company to increase the overall efficiency of its generation resources. RICEs also provide the best future fuel flexibility and its installation and maintenance can be completed in stages to reduce impact on operations.
-

 S&L recommended installing a total of 125 to 150 MW of on-Island dispatchable generation and a 10 MW/40 MWh BESS. The range was recommended before the Company was aware of the OHPA program. Based on the expected impact that the OHPA program will have on system peak, the Company is proposing to install a total of 150 MW.

 Following the completion of the CRS addendum, S&L was retained to complete cost estimates for potential capacity portfolios, including the suggested technologies at varying levels, to provide the recommended level of on-Island dispatchable generating capacity. A preliminary cost estimate was provided in September 2023 and was used to allow Maritime Electric to choose the components and their relative sizes to be included in the Project. The current combination of a 10 MW/40 MWh BESS, 50 MW CT4 and 90 MW RICE plant was selected to provide a balance of operational requirements, including reactive power support, cost effectiveness and operational flexibility.

 The preliminary cost estimates were updated in September 2024 to reflect changes in design 29 parameters and equipment pricing and is included in Appendix A^{171} A^{171} A^{171} The Component costs included in Section 6.4 were taken from the updated cost estimate.

¹⁷¹ The updated cost estimate was an AACE Class 4/5 cost estimate which is assigned a probable accuracy range of 30 per cent after application of a 20 per cent contingency. Refer to Section 6.4 for further details on this estimate.

7.7 Long-Term Fuel Options

 Given the Federal and Provincial Governments' goals to reduce GHG emissions, along with Maritime Electric's goals to reduce GHG emissions, the Company is mindful of the type of fuel that will be consumed by the proposed capacity resources. In order of importance, the selected fuel type must be: (1) readily available to ensure the capacity resources can be operated when needed and for as long as they are needed; (2) cost effective; and (3) environmentally responsible.

 In the short term, CT4 and the RICE plant will both be diesel-fired. The use of diesel is warranted because it is the only current fuel source that satisfies criteria 1 and 2. With respect to criteria 3, the Company believes that the short-term use of diesel does not disregard its pledge to be environmentally responsible. The fact that the Company's capacity resources will only be used as peaking and backup resources means that the consumption of diesel will be limited. As alternate fuel sources become more mainstream, thereby satisfying criteria 1 and 2, the Company will be properly positioned to convert to a more environmentally responsible fuel because the proposed CT4 and RICE plant will be capable of operating on alternate fuels.

 There are several alternate fuel sources with less carbon impact than diesel that can be used with CTs and RICEs. Biodiesel, natural gas, and hydrogen have all been touted as potential fuel sources that have less environmental impact than diesel and could be used in the proposed generation.

Biodiesel

 Biodiesel is a renewable fuel that is produced from wood mass, vegetable oils, animal fat or recycled restaurant grease. There is presently no large-scale biodiesel producer in the region, and PEI likely has insufficient biomass available to justify the construction and operation of a biodiesel production facility. The biodiesel industry is in its infancy and needs to be developed where resource materials are available for the fuel to be used in both electricity production and industry.

 Biodiesel has composition issues that make it more limiting as a fuel than traditional diesel. Impurities and its chemical properties, depending on its source material, mean its storage and use must be more carefully monitored. As such, it will likely be used in small quantities, often

- 2 blended into traditional diesel to lower the overall carbon footprint of the fuel consumed.^{[172](#page-114-0)}
-

 While Biodiesel is a future fuel option for RICEs, CTs have much more stringent standards for fuel chemical composition and physical properties, so biodiesel would have to be thoroughly evaluated before it is considered for use in CTs. However, turbine manufacturers indicate that CTs can burn biodiesel blends today.

Natural Gas

 Natural gas is regionally available through the Maritimes & Northeast Pipeline ("M&NP"), which is a 1,100-kilometre ("km") natural gas pipeline from NS to Massachusetts. There is no pipeline connecting the M&NP to PEI, so any natural gas use on PEI must be transported by truck or shipped from the mainland. Several PEI businesses use gas sourced from the M&NP pipeline in a compressed natural gas ("CNG") state. This CNG is typically drawn from the pipeline and compressed at a location near Port Elgin, NB.

 The use of natural gas on PEI generation facilities would require the development of transportation pathways, natural gas supply contracts and on-Island offloading and storage facilities. The logistics are more complicated than for traditional diesel, since a 50 MW CT at full 20 output would use approximately 39 CNG trucks over a 24-hour period.^{[173](#page-114-1)} The combustion of natural gas for electricity production emits roughly half the GHG emissions compared to diesel. The Company believes that strong consideration should be given for CNG use in existing and future CTs, if supply and transportation logistics are developed or if Federal regulations limit the allowed amount of diesel-fired electricity generation. The proposed CT4 and RICE plant will both be capable of using natural gas, should handling and storage infrastructure be developed on PEI in the future.

¹⁷² Storing biodiesel in small quantities ensures that it will be used before it expires. Diesel may be needed to accommodate longer, unexpected operations.

¹⁷³ Based on a daily requirement of 11,400,000 cubic feet of natural gas for 50 MW of output over a 24-hour period, and a quantity of 300,000 cubic feet of natural gas per truck. If an offloading compressor is not incorporated into the design an additional 10 trucks per day could be required to compensate for the high gas pressure required in combustion turbines.

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 Liquefied natural gas ("LNG") is not practical from a supply, storage or usage perspective for Maritime Electric. First, there is no regional supplier of LNG, which would require its shipment over a much greater distance than CNG. Second, it would require offloading and storage facilities similar to CNG. Third, the shelf life of LNG is limited as it boils back to its gaseous state over time, requiring additional refrigeration to return it to its liquid state or resulting in lost product. The nature of the Company's generation operation, as a peaking and backup resource, means that there are extended periods when the units would not operate, which could result in the LNG boiling and becoming unusable. All these factors result in LNG not currently being a viable option.

Hydrogen

 Hydrogen is a renewable fuel that is growing in popularity. Its carbon impact and level of renewability depend on how it is sourced. Hydrogen is typically produced from methane, which leads to carbon emissions. It can also be produced through electrolysis of water and can be up to 100 per cent renewable, depending on the energy source used for the process. Electrolysis is energy intensive, and the energy required to separate the water molecules into hydrogen and oxygen is far more than the energy derived from the hydrogen fuel itself.

 Hydrogen on its own burns very hot, causing thermal issues with materials currently used in CTs and RICEs. Hydrogen can alternatively be blended with a gaseous fuel source, such as CNG, at 20 concentrations of up to 30 per cent.^{[174](#page-115-0)} This makes hydrogen a potential blending fuel source if combined with CNG.

 There is presently no large-scale hydrogen producer or source in the region. The hydrogen industry is in its infancy and needs to be developed further before it can be considered for electricity production or other industrial uses.

Maritime Electric will continue to monitor the technological development of hydrogen as a potential

fuel source; however, it is not currently a viable option.

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¹⁷⁴ Some tests have proven that higher concentrations can be used in CTs and RICEs, as documented in the following link: [https://www.epa.gov/system/files/documents/2023-05/TSD%20-](https://www.epa.gov/system/files/documents/2023-05/TSD%20-%20Hydrogen%20in%20Combustion%20Turbine%20EGUs.pdf) [%20Hydrogen%20in%20Combustion%20Turbine%20EGUs.pdf](https://www.epa.gov/system/files/documents/2023-05/TSD%20-%20Hydrogen%20in%20Combustion%20Turbine%20EGUs.pdf) - U.S. Environmental Protection Agency, Hydrogen in Combustion Turbine Electric Generating Units Technical Support Document.

Fuel Recommendation

 As indicated above, the proposed CT4 and RICE plant will initially be diesel-fired as diesel is readily available, the Company has existing storage capabilities for diesel and it is much more cost effective than other available fuel sources. CT4 and the RICEs will have dual fuel capabilities, meaning they can be converted to burn gaseous fuels in the future. In the long term, the Company expects the most likely alternative fuels for the proposed CT4 and RICE plant to be as follows: ▪ **CT4:** CNG, possibly combined with hydrogen if it is available and economic.

- **RICE Plant:** biodiesel combined with traditional diesel or a new, not yet developed, 10 renewable diesel.^{[175](#page-116-0)}
-

Standalone use of a specialty fuel such as biodiesel or hydrogen is expensive and can lead to

fuel supply challenges. The Company believes that the long-term alternate fuel choice for the

proposed generation cannot be made in isolation and should be made in conjunction with the

long-term alternate fuel plan and strategy for the province and region. This will help avoid

stranded costs if future expenditures are made to accommodate alternate fuels.

 Such as SustainAGRO proposed to begin manufacturing in Kensington back in 2023: [https://www.cbc.ca/news/canada/prince-edward-island/pei-biomass-energy-facility-kensington-](https://www.cbc.ca/news/canada/prince-edward-island/pei-biomass-energy-facility-kensington-1.6847833#:~:text=6-,The%20town%20of%20Kensington%2C%20P.E.I.%2C%20may%20soon%20be%20home%20to,new%20jobs%20for%20the%20community)[1.6847833#:~:text=6-](https://www.cbc.ca/news/canada/prince-edward-island/pei-biomass-energy-facility-kensington-1.6847833#:~:text=6-,The%20town%20of%20Kensington%2C%20P.E.I.%2C%20may%20soon%20be%20home%20to,new%20jobs%20for%20the%20community) [,The%20town%20of%20Kensington%2C%20P.E.I.%2C%20may%20soon%20be%20home%20to,new%20jobs](https://www.cbc.ca/news/canada/prince-edward-island/pei-biomass-energy-facility-kensington-1.6847833#:~:text=6-,The%20town%20of%20Kensington%2C%20P.E.I.%2C%20may%20soon%20be%20home%20to,new%20jobs%20for%20the%20community) [%20for%20the%20community](https://www.cbc.ca/news/canada/prince-edward-island/pei-biomass-energy-facility-kensington-1.6847833#:~:text=6-,The%20town%20of%20Kensington%2C%20P.E.I.%2C%20may%20soon%20be%20home%20to,new%20jobs%20for%20the%20community) - Green energy business eyes opportunity in P.E.I.'s net-zero plans

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8.0 ALTERNATIVES

 The Company examined several alternatives to the Project as proposed, including increasing the transfer capabilities from the mainland to PEI and locating additional generation on the mainland. In addition, the Company examined costs associated with BESS sizing and inclusion of emissions reduction technology in the Project.

8.1 Increase Transfer Capabilities

 Maritime Electric can access off-Island capacity resources if there is appropriate transmission infrastructure both on the mainland and connecting the mainland to PEI. Currently, the NB transmission system transfer limit for PEI is 300 MW, while the Interconnection's transfer capacity limit is also (separately, but coincidentally) 300 MW. Both mainland transmission and Interconnection facilities have to be expanded in order for PEI to be capable of importing more than 300 MW of firm capacity.

8.1.1 Increase Mainland Transfer Capabilities

 Large-scale NB transmission expansion projects that would increase the transfer limit to the interconnection and PEI have been under consideration for some time. A much-publicized proposal to develop an "Atlantic Loop" would have increased the NB transmission system capacity limit to both PEI and NS and supplied large-scale hydro electric energy from Quebec to the Maritime region. However, the Governments of Canada, NS and NB recently shifted their focus to a "Modified Atlantic Loop," which could eventually lead to increases in the NB transmission \degree capacity transfer limits to PEI.^{[176](#page-117-0)}

 The first phase of the proposed Modified Atlantic Loop would include a new 65 km 345 kV transmission line from Salisbury, NB to Memramcook, NB (the substation where the Interconnection originates) and continuing into the NS transmission system. This would not increase the transfer limits from NB to PEI but would increase the reliability of the transmission interties between NB and NS/PEI. Additional phases are being considered that could potentially

 [https://www.canada.ca/en/natural-resources-canada/news/2023/10/governments-of-canada-nova-scotia-and](https://www.canada.ca/en/natural-resources-canada/news/2023/10/governments-of-canada-nova-scotia-and-new-brunswick-show-progress-toward-phasing-out-coal-by-2030-and-expanding-their-clean-reliable-and-affordable.html)[new-brunswick-show-progress-toward-phasing-out-coal-by-2030-and-expanding-their-clean-reliable-and](https://www.canada.ca/en/natural-resources-canada/news/2023/10/governments-of-canada-nova-scotia-and-new-brunswick-show-progress-toward-phasing-out-coal-by-2030-and-expanding-their-clean-reliable-and-affordable.html)[affordable.html](https://www.canada.ca/en/natural-resources-canada/news/2023/10/governments-of-canada-nova-scotia-and-new-brunswick-show-progress-toward-phasing-out-coal-by-2030-and-expanding-their-clean-reliable-and-affordable.html) - Natural Resources Canada, Governments of Canada, Nova Scotia and New Brunswick Show Progress Toward Phasing Out Coal by 2030 and Expanding Their Clean, Reliable and Affordable Electricity Grids.

 increase transfer limits between NB and NS/PEI, but no project announcements have been made 2 to date.

 The cost of this multi-phase transmission expansion is significant and could not be justified based on the benefits to PEI alone. A cost-sharing mechanism between the benefiting parties (i.e., Governments of Canada, NB, NS and PEI, as well NS Power, NB Power, Maritime Electric and smaller municipal utilities) is outstanding. Regardless, the Modified Atlantic Loop does not add capacity resources in the region and does not address on-Island reliability issues for limitations on the Interconnection.

8.1.2 Interconnection Expansion

 The transfer capacity of the Interconnection is limited by Cables 1 and 2, each of which has a capacity of 100 MW. The Interconnection transfer limit cannot be increased without replacing these cables. When Cables 1 and 2 reach end of life, they will likely be replaced with cables having a capacity of 180 MW, similar to Cables 3 and 4, along with a fourth transmission line 16 connecting the mainland system to the cables.^{[178](#page-118-1)} This will increase the transfer capacity of the Interconnection itself, but it must be completed in conjunction with NB transmission system upgrades in order to increase the import capacity transfer limits to PEI. With both the cable replacement and an upgrade to the NB transmission system, the import capacity transfer limit to PEI could potentially be increased beyond 300 MW. Given the capital investment needed for both of these upgrades, the Company does not believe this is a realistic solution to address the immediate forecast capacity deficit.

 Even if the import capacity transfer limit was increased above 300 MW, PEI would lose the reliability benefits associated with locating additional dispatchable capacity resources on-Island if it elects to source incremental capacity from off-Island resources.

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¹⁷⁷ Along with transmission expansion, additional reactive power support is also required in the southeast region of NB before transfer limits to PEI could be increased. Subsequent references to transmission upgrades within this section refer to both transmission expansion and additional reactive power support.

¹⁷⁸ The Company is currently studying expansion of the Interconnection. Preliminary results suggest that replacing Cables 1 and 2 with cables similar to Cables 3 and 4, each with a dedicated transmission line, is the preferred option. The study will be completed early in 2025 and will be filed with the Commission upon completion.

8.2 Generation Expansion in New Brunswick

 NB Power recently announced plans to add a 400 MW natural gas plant in Scoudouc, 20 km northeast of Moncton. Maritime Electric expects that such a generation project would use CT or RICE technology, and that the cost of securing generating capacity from such a project would be comparable to building additional generation resources on PEI. Such a project will provide system benefits to that area, such as increased reliability, voltage support and increased system strength. Some of these benefits will also benefit PEI, but due to the distance between the project and PEI and the physical properties of the subsea cables, the voltage support and system strength benefits will not be as impactful to PEI. In addition, the Interconnection's 300 MW firm transfer capacity limit will still limit the amount of capacity that can be imported from the mainland.

 The Company expects that the cost of capacity from new mainland-based generation will be similar to the cost of on-Island generation, but without many of the reliability benefits. As such, the Company is not pursuing new mainland-located generation as a source of incremental capacity at this time.

8.3 Additional BESS Capacity

 As discussed in Section 6.1, a 10 MW/40MWh BESS is a prudent investment at this time. A larger- scale BESS to address the forecast capacity deficit during a system peak is not recommended as the system peak reduction capabilities of a BESS are limited.

 In order for a BESS to be counted as a capacity resource, it must be charged during low-load periods and discharged during high-load periods. Figure 29 shows the hourly customer load during the February 4, 2023, system peak, and demonstrates the amount of energy storage that would have resulted in a perfectly levelized load, which represents the theoretical maximum system peak reduction possible by a BESS. The Figure shows the BESS charging (in green) when the load is less than the levelized load and discharging (in red) when the load is higher than the theoretical load curve. The maximum system peak reduction that could be achieved in this example is 32 MW (357 MW minus 325 MW, or a 9 per cent reduction), requiring a BESS with at

least 262 MWh of energy storage.^{[179](#page-120-0)} This example is an academic exercise, meaning that, in reality, the Maritime Electric System Operator would be unable to predict what the levelized load

-
- level will be for the day, and thus would not know in advance when to switch from charge to
- discharge.
-

 A more practical and economic approach is to use a smaller BESS to achieve some level of system peak reduction (e.g., 10 or 20 MW), as recommended in this Application. Table 21 shows the BESS capacity requirements to reduce system peaks by 10, 20 and 30 MW in 2019 to 2023, and the maximum system peak reduction possible with a levelized load. It shows that increasing system peak reduction from 20 to 30 MW using a BESS requires a significantly larger BESS (167 MWh compared to 66 MWh), and the BESS cost would more than double. The first 10 MW of system peak reduction with a BESS is the most practical and economic, and the size requirements and cost of the BESS increase rapidly to achieve higher reductions in system peak.

The round-trip efficiency of a BESS is assumed to be 85 per cent, resulting in 262 MWh of energy storage required to discharge 241 MWh from the BESS. 284 MWh (241 MWh divided by 85 per cent) of energy is required to charge the BESS up to 262 MWh, and the 262 MWh of storage capacity is required to discharge 241 MWh from the BESS.

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 Additionally, as per Section 6.1, the Company plans to operate the BESS as a capacity resource during the winter peaking season and then as ancillary service support for the remaining 9 months of the year. This annual operating methodology maximizes the economic benefit of the BESS. As the Company only requires 12.5 MW of ancillary services, a BESS larger than 12.5 MW would 6 have diminished economic benefit.^{[180](#page-121-0)}

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8 Therefore, the Company is proposing a 10 MW/40MWh BESS as part of the Project.

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10 **8.4 Emission Reduction and Monitoring Technology**

 Equipment can be added to a CT or RICE unit to help monitor or reduce certain types of emissions. The cost estimate provided by S&L included optional pricing for several equipment technologies related to emissions monitoring and reduction including emissions controls, biodiesel capability and a Continuous Emission Monitoring System ("CEMS"). Table 22 provides a brief description and the associated costs for each of these options.

¹⁸⁰ As per Table 11, the Company presently purchases 4.7 MW of load following and 7.8 MW of spinning reserve. The Company also purchases 1.7 MW of AGC (or frequency regulation) but the BESS cannot satisfy this service.

1

 These technologies have not been included in this Application. The SCR system has a high cost for the amount of energy that is expected to be produced. With respect to the CEMS, it would 4 provide better accuracy for emissions but does not change actual emissions.^{[181](#page-122-0)} Combined with the knowledge that this generation will operate minimally and only as required, the Company does 6 not believe that extra cost of CEMS and SCR are warranted.^{[182](#page-122-1)} However, biodiesel could be a viable option when such fuel supply becomes readily available and economical compared to alternate fuels.

¹⁸¹ In the absence of CEMS the generating source's emissions are measured, recorded and plotted during commissioning. These measured emissions are then used to estimate future emissions. This method is how current emissions from CT1, CT2 and CT3 are recorded and reported annually.

¹⁸² The Company has forecasted that the total energy supply from its entire on-Island dispatchable generation fleet will be make up less than 1 per cent of the total energy supply to customers. The increased cost of sourcing energy from CT4 or the RICE plant as compared to sourcing it from NB Power or on-Island renewable sources will serve as a significant deterrent to operating this generation more than required.

 There are currently no regulations that require the Company to install such emission control or monitoring technology. While the Company is keen to reduce emissions as low as reasonably possible, the Company believes it is appropriate to list these options for discussion but to exclude them from the base price for the Project. **8.5 Analysis of Alternatives** Off-Island transmission and generation initiatives have the ability to increase the delivery and supply of off-Island capacity resources to PEI. However, neither of these initiatives addresses issues of: **·** financial risk due to competition between utilities; **•** exposure to disconnection from the mainland; and **·** increased Hold-to-Schedule events as more renewable energy supplies are built on- Island. For these reasons, the Company recommends that the Project proceeds as proposed.

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9.0 GREENHOUSE GAS EMISSIONS

 Maritime Electric supports the Province's net zero emissions by 2040 target by delivering cleaner energy to customers. As customers transition from fossil fuel-based energy sources to electricity, the electricity delivered to customers should support the clean energy objective. The Company's on-Island dispatchable generation resources, which are primarily used for backup purposes, will play an important role in supporting the transition to renewable energy and supplying customer load during system peak periods.

9.1 Generation Requirements

 As discussed in Section 5.1.2, there are five primary reasons why Maritime Electric operates its CTs: (1) unit testing; (2) NB Power hold-to-schedule directives; (3) emergency energy supply to others; (4) on-Island transmission related-events; and (5) curtailment by NB Power. Table 23 shows Maritime Electric's annual generation requirements by reason from 2021 to 2023, and a generation requirement forecast up to 2033. The Table shows that generation requirements, especially those related to "Curtailment by NB Power" events are forecast to increase. "Curtailment by NB Power" events are expected to increase because the amount of time when Maritime Electric's customer load is above the Interconnection transfer capacity limit is expected to increase. Despite a forecast increase in total generation requirements, it is forecast to be a small percentage of the total energy supplied remaining below 1 per cent by 2033.

1

2 **9.2 Generation Fuel Efficiency**

3 Maritime Electric's existing CTs consume diesel and produce GHG emissions during operation.

4 The fuel efficiency of the Company's existing CTs and proposed generating units vary depending

5 on their age and type. Table 24 shows the fuel efficiencies (i.e., heat rate) of the Company's

6 existing CTs based on data from 2019 to 2023 and the expected fuel efficiencies of the proposed

7 $CT4$ and RICE plant.^{[183](#page-125-0)}

¹⁸³ Heat rate is a measurement of the efficiency of electrical generators/power plants that convert a fuel into heat and into electricity. The heat rate is the amount of energy used by an electrical generator/power plant, which in this case is measured in British Thermal Units ("BTU"), to generate 1 kWh of electricity.

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1 a. The heat rate for CT4 is assumed to be the same as CT3.

2 b. The heat rate for the RICE plant is based on Page A-1

4 consistent heat rate at part load and through differing environment b. The heat rate for the RICE plant is based on Page A-1 of the S&L Extreme Weather Event Capacity Impact, 3 Addendum to December 2022 CRS. It assumes maximum efficiency is achieved because a RICE unit has consistent heat rate at part load and through differing environmental conditions.

- 6 CT1 and CT2 were installed in 1971 and 1973, respectively, and are significantly less fuel efficient 7 (i.e., have higher heat rates) than CT3, which was installed in 2005; therefore, the Company 8 prioritizes the use of CT3 when generation is required, which reduces total fuel consumption, 9 emissions, and operating costs.^{[184](#page-126-0)} CT4 is expected to have a similar heat rate to CT3, but the 10 RICE plant's heat rate is expected to be lower because its efficiency is unaffected by generator 11 loading levels and ambient environmental conditions.^{[185](#page-126-1)} If the proposed CT4 and RICE plant are 12 added, the Company will prioritize the use of the RICE plant, CT4 and CT3 over CT1 and CT2, 13 which are less efficient.
- 14

5

15 **9.3 Greenhouse Gas Emissions Forecast**

16 Table 25 shows the forecast generation-related diesel consumption and associated GHG

- 17 emissions. Although the total GHG emissions is forecast to increase, the average GHG emission
- 18 intensity (i.e., kg $CO₂e/kWh$) is expected to improve with the addition of the BESS (2028), CT4

¹⁸⁴ If the required generation is below 15 MW, which is the minimum load for CT3, then CT1 or CT2 is used instead of CT3.

¹⁸⁵ The efficiency of RICE technology does not decrease at lower output levels like CTs do. Also, a RICE plant will contain a number of small individual generating units which are operated such that units are loaded up to full output before the next unit is started. If 18 MW of generation is needed, only one unit runs, for 27 MW one unit would run at 100 per cent and a second unit would run at 50 per cent, at 36 MW two units run at 100 per cent, etc. This further increases the efficiency of a RICE plant at reduced output levels.

1 (2029) and the RICE plant (2030), as well as the eventual retirement of CT1 (2031) and CT2

- 2 (2033).^{[186](#page-127-0)} This is due to CT4 and the RICE plant being more fuel efficient than CT1 and CT2.
- 3

4 a. Diesel consumption forecast is based on average heat rates for each unit shown in Table 24.
5 b. Based on GHG emission factors for diesel in the 2019 Canada Greenhouse Gas Quantific
6 Report - Table 2-6 and global war b. Based on GHG emission factors for diesel in the 2019 Canada Greenhouse Gas Quantification Requirements 6 Report - Table 2-6 and global warming potentials from the IPCC Fifth assessment report.

7

8 The addition of the BESS, CT4 and the RICE plant, as well as the retirement of CT1 and CT2,

9 are expected to result in lower GHG emission increases compared to the Company continuing to

10 rely solely on CT1, CT2 and CT3 to fulfill its future generation requirements. Figure 30 compares

11 the estimated annual generation-related GHG emissions with and without the Project. The Figure

12 demonstrates the GHG emission impacts of utilizing more fuel-efficient generation resources.

¹⁸⁶ The installation a BESS, CT4 and a RICE plant are assumed to lower the average emission intensity in the year following their installation.

9.4 Impact on PEI Greenhouse Gas Emissions Goals

 In 2018, the Province announced a target to reduce GHG emissions on PEI to 1.2 megatonnes 4 of carbon dioxide equivalent ("CO₂e") by 2030, which is a 40 per cent reduction from 2005 5 baseline levels.^{[187](#page-128-0)} In 2022, the Province released a 2040 Net Zero Framework report that outlines 6 how PEI will reach the 2030 target and a net zero by 2040 target.^{[188](#page-128-1)} The six pillars and associated targets outlined in the report are:

-
- 1. Transportation emissions: 25 to 30 per cent reduction by 2030 and 55 to 65 per cent reduction by 2040;
- 2. Buildings: 65 to 70 per cent reduction by 2030 and 85 to 95 per cent reduction by 2040;
- 3. Agriculture: 10 to 15 per cent reduction by 2030 and 35 to 40 per cent reduction by 2040;
- 4. Carbon removal: 10 to 15 per cent increase by 2030 and 25 to 30 per cent increase by 2040 per cent;

 [https://www.princeedwardisland.ca/en/information/environment-energy-and-climate-action/greenhouse-gas](https://www.princeedwardisland.ca/en/information/environment-energy-and-climate-action/greenhouse-gas-emissions)[emissions](https://www.princeedwardisland.ca/en/information/environment-energy-and-climate-action/greenhouse-gas-emissions) – Government of PEI, Greenhouse Gas Emissions.

<https://www.princeedwardisland.ca/en/publication/2040-net-zero-framework> - Government of PEI, 2040 Net Zero Framework.

- 5. Industry and waste: 65 to 70 per cent reduction by 2030 and 85 to 95 per cent reduction by 2040; and
- 6. Net zero energy by 2030 and net zero GHG emissions by 2040.
-

 Figure 31 shows PEI's total 2022 GHG emissions by sector, including a category for Maritime Electric's generation-related GHG emissions. The Figure demonstrates that the Company's generation-related GHG emissions are the smallest of all the categories with less than one percent (i.e., 0.17 per cent) of PEI's total GHG emissions.

- Despite the Company's forecast that generation-related GHG emissions will increase, they will
- remain a small percentage of PEI's total GHG emissions. Figure 32 shows the Company's
- forecast of its generation-related GHG emissions alongside the Government of Canada's forecast
- for PEI's total GHG emissions. The Company's generation-related GHG emissions are forecast

1 to be less than 1 per cent of the total PEI GHG emission target of 1.2 megatonne ("Mt") of $CO₂e$

- 2 by 2030.^{[189](#page-130-0)}
- 3

4

5 **9.5 Canada Clean Electricity Regulations**

 In August 2023 the Federal Government released draft Clean Electricity Regulations ("CER") that align with a target of net-zero electricity grid by 2035. Following a public consultation period, an updated draft CER was released in February 2024. The updates include details about GHG emission standards for existing and future power generation units. A final version of the CER is 10 expected by the end of 2024, and the CER is expected to be effective on January 1, 2025.^{[190](#page-130-1)} 11

12 The August 2023 draft of the CER included provisions for peaking electricity generation units with

13 a 450-hour operation limit per year.^{[191](#page-130-2)} The February 2024 draft of the CER proposes an emissions

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¹⁸⁹ The forecast PEI GHG emissions from the Government of Canada showed the target being reached in 2031.
190 https://www.canada.ca/content/dam/eccc/documents/pdf/climate-change/clean-fuel/electricity/clean-electricity

¹⁹⁰ [https://www.canada.ca/content/dam/eccc/documents/pdf/climate-change/clean-fuel/electricity/clean-electricity](https://www.canada.ca/content/dam/eccc/documents/pdf/climate-change/clean-fuel/electricity/clean-electricity-regulations-public-update-16022024.pdf)[regulations-public-update-16022024.pdf](https://www.canada.ca/content/dam/eccc/documents/pdf/climate-change/clean-fuel/electricity/clean-electricity-regulations-public-update-16022024.pdf) - Environment and Climate Change Canada, Clean Electricity Regulations, Public Update.

¹⁹¹ Peaker units are generators that generally only run during periods of high customer load (i.e., during a system peak).

- 1 limit approach, where each generating unit would have an annual emission limit based on the
- 2 formula shown in Figure 33 and a performance standard of 30 t/GWh.^{[192](#page-131-0)}
- 3

4

5 A performance standard of 30 t/GWh results in an emission limit that is well above the current 6 emission levels of Maritime Electric's existing CTs. For example, CT1, CT2 and CT3 have a 7 combined capacity of 89 MW, which results in an emission limit of 23,389 t/year (30 t/year x 89 8 MW x 8760 hours / 1000); whereas, in 2023, the CTs emitted 3,036 t of CO₂e, which is only 13 9 per cent of the draft CER limit.

10

 Figure 34 shows the Company's forecast of generation emissions and the corresponding emission limits per the draft CER with a performance standard of 30 t/GWh. The Figure demonstrates that Maritime Electric forecasts its generation emissions to remain well below the draft CER emission limits. The installation of CT4 and the RICE plant, which are significantly more fuel efficient than CT1 and CT2, will help to lessen increases in generation emissions while increasing the combined emission limit. The fuel flexibility options for CT4 and the RICE plant described in Section 7.7 also provide options to further reduce generation emissions in the future to ensure the Company complies with the CER.

¹⁹² The August 2023 draft of the CER included a performance standard of 30 tonnes of CO₂e per GWh (i.e., 30 t/GWh); however, the February 2024 update indicated that the 30 t/GWh performance standard is under consideration as meeting the limit would likely not be feasible for load-following units equipped with carbon capture and storage. Load-following units are generators that operate while continuously adjusting their output to balance customer load and renewable energy generation.

¹⁹³ [https://www.canada.ca/content/dam/eccc/documents/pdf/climate-change/clean-fuel/electricity/clean-electricity](https://www.canada.ca/content/dam/eccc/documents/pdf/climate-change/clean-fuel/electricity/clean-electricity-regulations-public-update-16022024.pdf)[regulations-public-update-16022024.pdf](https://www.canada.ca/content/dam/eccc/documents/pdf/climate-change/clean-fuel/electricity/clean-electricity-regulations-public-update-16022024.pdf) – Environment and Climate Change Canada, Clean Electricity Regulations, Public Update (page 7).

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 Based on the February 2023 draft CER, the generation proposed in this Project, and the Company's existing CTs, will be exempt from the CER. In addition, the draft CER states that the Federal Government is considering adding provisions to exclude emissions related to the operation of generating units during emergency situations. Details of the emergency provisions, such as what events constitute an emergency and the amount of time that generating units can 7 operate and remain exempt, have not been released by the Federal Government.^{[194](#page-132-0)} The Company is closely monitoring the progress of the CER and will provide the Commission with an update when the final CER is issued.

9.6 Maritime Electric Greenhouse Gas Emissions Target

 Maritime Electric has a target to reduce its GHG emissions by 55 per cent by 2030, from 2019 levels. The target includes all GHG emissions associated with electricity delivered to customers. Although this Project will result in an increase of generation emissions, the Company's goal of integrating additional wind and solar energy resources to the grid will significantly reduce the Company's Scope 2 and 3 GHG emissions. The GHG emission reductions achieved by integrating wind and solar energy are significantly greater in magnitude than the forecast

An emergency provision would be of interest for the Company when considering the possibility of significant generation requirements during a prolonged subsea cable outage or similar event.

- 1 increases in emissions due to dispatchable generation. Therefore, the Company remains on track
- 2 to achieve its 2030 target.

SECTION 10.0 – ESTIMATED IMPACT ON RATE BASE, REVENUE REQUIREMENT AND CUSTOMER RATES

10.0 ESTIMATED IMPACT ON RATE BASE, REVENUE REQUIREMENT AND CUSTOMER RATES

 As discussed in Section 6.4.2, there are several factors that make it challenging to provide an accurate cost estimate for the Project. Similarly, these factors make it difficult to provide an accurate impact on rate base, revenue requirement and customer rates for the Project. The factors that will influence the estimated impact on rate base, revenue requirement and customer rates include:

-
- **·** the capacity values of each Project component (i.e., 10, 50 and 90 MW) are nominal capacity values that may change during the RFP process;
- **·** inflation between 2024 (i.e., the base year for the Project cost estimate) and the time of construction;
- **·** the impact of CT and RICE equipment market pricing dynamics in a period of high demand;
- **·** the USD to CAD exchange rate at the time of material purchases;
- **•** the level of accuracy of the Class 4/5 cost estimate provided by S&L, which is assigned an accuracy range of 30 per cent;
- **·** the timing of completion for each Project component;
- Maritime Electric's rate base and customer rates at the time of Project completion; and
- **•** the cost of avoided capacity and ancillary service purchases from NB Power at the time of Project completion.
-

 Given the large number of factors that influence estimated impact on rate base, revenue requirement and customer rates of the Project, it is not feasible to provide accurate estimates at this time; however, Maritime Electric calculated a hypothetical impact on rate base, revenue requirement and customer rates of the Project to provide a level of magnitude to the Commission and stakeholders. The hypothetical impacts are based on the following:

-
- **•** 2024 Class 4/5 Project cost estimate provided by S&L;
- **•** 2024 estimated annual O&M costs provided by S&L;
- Avoided capacity and ancillary service costs based on 2024 rates in Maritime Electric's EPA with NB Power; and
- **■** Maritime Electric's 2024 rate base and rates.
-

 The hypothetical impact to customer rates of the Project is approximately 10 per cent for 6 benchmark Rural Residential, Urban Residential and General Service customers.^{[195](#page-135-0)} The impact on customer rates is hypothetical because it is based on an assumption that the Project is installed in 2024, based on 2024 estimated Project costs, 2024 avoided costs and 2025 rate base. Detailed calculations for the hypothetical impact on rate base, revenue requirement and customer rates are provided in Confidential Appendix F.

 While the completion of this Project will result in an increase in customer rates, over the useful life of the Project components and on a present value basis, the Project's costs are expected to be more than offset by the avoided costs, resulting in a positive economic benefit to customers, as discussed in Section 6.4.3. The Project is estimated to result in savings of approximately 20 per cent compared to doing nothing and continuing to purchase capacity resources and ancillary services from NB Power.

 Maritime Electric will provide an accurate impact on rate base, revenue requirement and customer rates once the RFP process is complete. Therefore, the Company is seeking approval from the Commission for a deferral of up to \$12 million for upfront engineering work and completion of the RFP process.

¹⁹⁵ Benchmark Residential Rural and Residential Urban customers include 650 kWh of consumption per month. Benchmark General Service customers include 10,000 kWh of consumption per month. Taxes are excluded from the impact to customer rates.

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APPENDIX A

Sargent & Lundy Project Cost Estimates

Terrence Coyne, P.E. Principal Energy Consultant (Licensed in IL) +1-312-269-3642 terrence.p.coyne@sargentlundy.com

Sent via email

September 26, 2024 | Final Project No. 14782.003

Re: Cost Estimating Services for Maritime Electric

Mr. Kent Nicholson, MBA, P.Eng. Manager, Production and Energy Control Operations Maritime Electric Company, Ltd. 50 Cumberland Street Charlottetown, PE C1A 5B9

Dear Kent,

Sargent & Lundy is pleased to submit to Maritime Electric Company, Ltd. the engineering cost estimates for new generation, battery energy storage, and electrical support equipment to be added to Prince Edward Island, consistent with the general recommendations of Sargent & Lundy's report titled *Capacity Resource Study: Evaluation of Various Technology Options for Maritime Electric Company*.

Further details are provided within this summary report with the cost estimates contained in the subsequent exhibits.

Best Regards,

Juny loyer

Terrence Coyne, P.E. Principal Energy Consultant

Attachments – All recipients Electronic Distribution Only Sam McKnight (Sargent & Lundy)

1. INTRODUCTION AND BACKGROUND

On December 9, 2022, Sargent & Lundy (S&L) issued a report titled *Capacity Resource Study: Evaluation of Various Technology Options for Maritime Electric Company*, which included an evaluation of different electricity capacity resource technologies, high level cost estimates, and recommend technologies well suited to helping Maritime Electric Company, Limited (MECL) meet its goals and needs. MECL's most important goals include meeting capacity and energy obligations, improving its ability to serve load during interruptions in electricity, and achieving environmental sustainability targets. The report ultimately concluded that a portfolio of reciprocating internal combustion engines (RICE) / combustion turbines (CTs), onshore wind, and solar photovoltaic (PV) was best suited to help MECL meet these goals.

During the period between February 3 and 5, 2023, large areas of Eastern Canada and the Maritimes provinces experienced extreme cold, driven by the disrupted southward movement of the northern polar vortex. S&L, in an addendum to the original *Capacity Resource Study* report, analyzed the event and its impact on Price Edward Island's (PEI) electrical systems as issued in a report titled *Extreme Weather Event Capacity Impact*. Due to the shortage in dependable resources seen during the event, S&L ultimately recommended to MECL to install 125 to 150 MW of new RICE/CTs with biofuel compatibility.

Consistent with the two previously submitted reports, the cost estimates developed for this scope of work provide MECL a more refined budgetary estimate for new on-island generation and other grid support equipment. A summary of the cost estimates is provided in the following sections of this submittal. Exhibit A through I contain the cost estimates developed, while [Exhibit J](#page-286-0) contains the technical basis of the estimates.

2. ESTIMATE SUMMARY

S&L and MECL ultimately decided to proceed with developing Association for the Advancement of Cost Engineering (AACE) Class 4/5 cost estimates (accuracy level of approximately +/- 30%) for the following:

- 1 x LM6000 PC Sprint Simple Cycle
- Addition of Synchronous Condensing Capability to Existing LM6000
- Substation Upgrades
- 10 MW / 40 MWh BESS
- 5 x 18 MW Wärtsilä Engines

The capital cost summary associated with each estimate performed is outlined below in [Table 2-1,](#page-141-0) in Canadian Dollars (CAD), at a conversion rate of 1.36 CAD to 1.00 USD. Further assumptions / inputs related to the estimates are contained in [Exhibit J.](#page-286-0)

Estimate Description	Project Capital Cost (CAD)	Exhibit Reference
1 x LM6000 PC Sprint Simple Cycle	170,586,329	Exhibits A, B
Addition of Synchronous Condensing Capability to Existing LM6000	13,435,661	Exhibits C, D
Substation Upgrades	10,550,742	Exhibit E, F
10 MW / 40 MWh BESS	26,636,960	Exhibit G
5 x 18 MW Wärtsilä Reciprocating Engines (RICE)	245,016,625	Exhibit H, I

Table 2-1 – Summary of Cost Estimates (CAD)

The critical major components in the above cost estimates are specified in each respective exhibit. The details within the existing substation upgrade cost estimate, are based on anticipated upgrades that will be required to allow full utilization of the reciprocating engines (RICE) power plant. These upgrades include adding an outer ring to an existing 69 kV bus and the addition of a 138 kV transmission line.

Note that all the detailed estimates (excluding for the BESS) documented in the attached Exhibits are provided in both "allocated" as well as "unallocated" versions. The unallocated versions show all individual estimate cost details with the General Conditions, Project Indirects, and Contingency costs broken out separately (on page 3 of the estimates). The allocated versions are provided as summary-level estimates that incorporate all indirect costs into each line item to provide an estimated total cost for each of the cost groupings as if priced separately by an EPC contractor (note that the BESS estimate is based on subcontract costs only, and therefore, the allocated and unallocated versions are the same).

2.1. ADDITIONAL LAND PURCHASE

While the RICE and BESS cost estimates were developed assuming no purchase of additional land would be required, there is the potential that land purchases may be require depending on the selected locations of the projects.

Based on RICE design, S&L estimates the following land requirements:

• 5 x 18 MW RICE: approximately 4 acres

Based on the BESS size, S&L's design criteria specify approximately 200 MWh/acre for battery enclosures and balance of plant. Therefore, for a 40 MWh BESS, approximately 0.2 acres would be required.

Based on feedback from MECL, land in the targeted areas ranges from CAD \$20,000 to CAD \$60,000 per acre.

L E G A L N O T I C E

This deliverable was prepared by Sargent & Lundy, L.L.C. (S&L) expressly for the sole use of Maritime Electric Company, Ltd. (Client) in accordance with the contract agreement between S&L and Client. This deliverable was prepared using the degree of skill and care ordinarily exercised by engineers practicing under similar circumstances. Client acknowledges: (1) S&L prepared this deliverable subject to the particular scope limitations, budgetary and time constraints, and business objectives of Client; (2) information and data provided by others, including Client, may not have been independently verified by S&L; and (3) the information and data contained in this deliverable are time-sensitive and changes in the data, applicable codes, standards, and acceptable engineering practices may invalidate the findings of this deliverable. Any use or reliance upon this deliverable by third parties shall be at their sole risk.
ISSUE SUMMARY AND APPROVAL PAGE

This is to certify that this document has been prepared, reviewed, and approved in accordance with Sargent & Lundy's Standard Operating Procedure SOP-0405, which is based on ANSI/ISO/ASSQC Q9001 Quality Management Systems.

Contributors

Prepared by:

Reviewed by:

Approved by:

September 26, 2024

Date

Terry Coyne Principal Energy Consultant and Project Manager

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LIST OF EXHIBITS

- **Exhibit A:** *[1 X PC SPRINT SIMPLE CYCLE TURBINE](#page-146-0) – ALLOCATED ESTIMATE*
- **Exhibit B:** *[1 X PC SPRINT SIMPLE CYCLE TURBINE](#page-172-0) – UNALLOCATED ESTIMATE*
- **Exhibit C:** *[ADDITION OF SYNCHRONOUS CONDENSING CAPABILITY TO EXISTING LM6000](#page-198-0) – ALLOCATED ESTIMATE*
- **Exhibit D:** *[ADDITION OF SYNCHRONOUS CONDENSING CAPABILITY TO EXISTING LM6000](#page-204-0) – UNALLOCATED ESTIMATE*
- **Exhibit E:** *[SUBSTATION UPGRADES](#page-210-0) – ALLOCATED ESTIMATE*
- **Exhibit F:** *SUBSTATION UPGRADES – [UNALLOCATED ESTIMATE](#page-217-0)*
- **Exhibit G:** *10 MW / 40 [MWH BESS](#page-224-0)*
- **Exhibit H:** *5 X 18 MW WӒRTSILӒ ENGINES – [ALLOCATED ESTIMATE](#page-228-0)*
- **Exhibit I:** *5 X 18 MW WӒRTSILӒ ENGINES – [UNALLOCATED ESTIMATE](#page-257-0)*
- **Exhibit J:** *[BASIS OF ESTIMATE](#page-286-0)*

EXHIBIT A. 1 X PC SPRINT SIMPLE CYCLE T U R B I N E – A L L O C A T E D E S T I M A T E

MARITIME ELECTRIC COMPANY LTD CHARLOTTETOWN, PEI 1X0 SC LM6000 PC SPRINT PLUS SYNCH CONDENSER

Factor table **_4 Productivity 1.15**

Estimate No.: 36484C
 Estimate No.: 36484C MARITIME ELECTRIC COMPANY LTD
 Estimate Date: 09/24/20024 MARILOTTETOWN, PEI

Estimate Date: 09/24/20024 Project No.: A14782.003
Estimate Date: 09/24/20024 **1X0 SC LM6000 PC SPRINT PLUS SYNCH CONDENSER**

Estimate Totals

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Estimate No.: 36484C **MARITIME ELECTRIC COMPANY LTD** Project No.: A14782.003 **CHARLOTTETOWN, PEI** Estimate Date: 09/24/20024 **1X0 SC LM6000 PC SPRINT PLUS SYNCH CONDENSER**

STEEL

SS 316, ABOVE GROUND, PROCESS AREA

MECHANICAL EQUIPMENT

NOT INCLUDED - USE EXISTING **A CONSTRUCT OF A CONSTRUCT ON A CONSTRUCT OF A CONSTRUCT O** Page 19

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EXHIBIT B. 1 X PC SPRINT SIMPLE CYCLE T U R B I N E – U N A L L O C A T E D E S T I M A T E

MARITIME ELECTRIC COMPANY LTD CHARLOTTETOWN, PEI 1X0 SC LM6000 PC SPRINT PLUS SYNCH CONDENSER

Factor table **_4 Productivity 1.15**

Estimate No.: 36484C
 Estimate No.: 36484C MARITIME ELECTRIC COMPANY LTD
 Estimate Date: 09/24/20024 MARILOTTETOWN, PEI

Estimate Date: 09/24/20024 Project No.: A14782.003
Estimate Date: 09/24/20024 **1X0 SC LM6000 PC SPRINT PLUS SYNCH CONDENSER**

Estimate Totals

I

Estimate No.: 36484C **MARITIME ELECTRIC COMPANY LTD** Project No.: A14782.003 **CHARLOTTETOWN, PEI** Estimate Date: 09/24/20024 **1X0 SC LM6000 PC SPRINT PLUS SYNCH CONDENSER**

STEEL

SS 316, ABOVE GROUND, PROCESS AREA

VALVES

MECHANICAL EQUIPMENT

FIRE PROTECTION EQUIPMENT & SYSTEM
31-41-00-99 FIRE PROTECTION (DETECTION) SYSTEM ALLOWANCE, INCLUDES
ABOVEGROUND BUILDING AND TANK FOAM SUPPRESION SYSTEMS

NOT INCLUDED - USE EXISTING **A CONSTRUCT ON A CONSTRUCT O**

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EXHIBIT C. ADDITION OF SYNCHRONOUS C A P A B I L I T Y T O E X I S T I N G L M 6 0 0 0 – A L L O C A T E D E S T I M A T E

MARITIME ELECTRIC COMPANY LTD CHARLOTTETOWN, PEI ADDITION OF SYNCHRONOUS CONDENSING CAPABILITY TO EXISTING LM6000

Factor table 4 Productivity 1.15

Estimate No.: 36500C **MARITIME ELECTRIC COMPANY LTD** Project No.: A14782.003
Estimate Date: 09/24/2024 **ADDITION OF SYNCHRONOUS CONDENSING CAPABILITY TO EXISTING LM6000**

Estimate Totals

Estimate No.: 36500C **MARITIME ELECTRIC COMPANY LTD** Project No.: A14782.003 **CHARLOTTETOWN, PEI** Estimate Date: 09/24/2024 **ADDITION OF SYNCHRONOUS CONDENSING CAPABILITY TO EXISTING LM6000**

Estimate No.: 36500C **MARITIME ELECTRIC COMPANY LTD** Project No.: A14782.003 **CHARLOTTETOWN, PEI** Estimate Date: 09/24/2024 **ADDITION OF SYNCHRONOUS CONDENSING CAPABILITY TO EXISTING LM6000**

EXHIBIT D. ADDITION OF SYNCHRONOUS C A P A B I L I T Y T O E X I S T I N G L M 6 0 0 0 – U N A L L O C A T E D E S T I M A T E

MARITIME ELECTRIC COMPANY LTD CHARLOTTETOWN, PEI ADDITION OF SYNCHRONOUS CONDENSING CAPABILITY TO EXISTING LM6000

Factor table 4 Productivity 1.15

Estimate No.: 36500C **MARITIME ELECTRIC COMPANY LTD** Project No.: A14782.003
Estimate Date: 09/24/2024 **ADDITION OF SYNCHRONOUS CONDENSING CAPABILITY TO EXISTING LM6000**

Estimate Totals

Estimate No.: 36500C **MARITIME ELECTRIC COMPANY LTD** Project No.: A14782.003 **CHARLOTTETOWN, PEI** Estimate Date: 09/24/2024 **ADDITION OF SYNCHRONOUS CONDENSING CAPABILITY TO EXISTING LM6000**

Estimate No.: 36500C **MARITIME ELECTRIC COMPANY LTD** Project No.: A14782.003 **CHARLOTTETOWN, PEI** Estimate Date: 09/24/2024 **ADDITION OF SYNCHRONOUS CONDENSING CAPABILITY TO EXISTING LM6000**

EXHIBIT E. SUBSTATION UPGRADES -A L L O C A T E D E S T I M A T E

MARITIME ELECTRIC COMPANY LTD EXISTING SUBSTATION LOCATION EXISTING SUBSTATION UPGRADE

Page 1

Estimate No.: 36503C **MARITIME ELECTRIC COMPANY LTD** Project No.: A14782.003
 Existinate Date: 09/24/2024

Existinate Date: 09/24/2024 **EXISTING SUBSTATION UPGRADE**

Estimate Totals

Estimate No.: 36503C **MARITIME ELECTRIC COMPANY LTD** Project No.: A14782.003 **EXISTING SUBSTATION LOCATION** Estimate Date: 09/24/2024 **EXISTING SUBSTATION UPGRADE**

Estimate No.: 36503C **MARITIME ELECTRIC COMPANY LTD** Project No.: A14782.003 **EXISTING SUBSTATION LOCATION** Estimate Date: 09/24/2024 **EXISTING SUBSTATION UPGRADE**

41.21.00 CONTROL & BACKUP POWER

EXHIBIT F. SUBSTATION UPGRADES -U N A L L O C A T E D E S T I M A T E

MARITIME ELECTRIC COMPANY LTD EXISTING SUBSTATION LOCATION EXISTING SUBSTATION UPGRADE

Page 1

Estimate No.: 36503C **MARITIME ELECTRIC COMPANY LTD** Project No.: A14782.003
 Existinate Date: 09/24/2024

Existinate Date: 09/24/2024 **EXISTING SUBSTATION UPGRADE**

Estimate Totals

Page 4

41.21.00 CONTROL & BACKUP POWER

E X H I B I T G . 1 0 M W / 4 0 M W H B E S S

MARITIME ELECTRIC COMPANY LTD GREENFIELD SITE 10 MW / 40 MWH BATTERY ENERGY STORAGE (BESS)

Estimate No.: 36501C **MARITIME ELECTRIC COMPANY LTD** Project No.: A14782.003 **GREENFIELD SITE** Estimate Date: 9/10/2024 **10 MW / 40 MWH BATTERY ENERGY STORAGE (BESS)**

Estimate Totals

E X H I B I T H . 5 X 1 8 M W W Ӓ R T S I L Ӓ E N G I N E S – A L L O C A T E D E S T I M A T E

MARITIME ELECTRIC COMPANY LTD LOCATION 2 5 X 18 MW RICE ENGINES

Estimate Totals

LANDSCAPING

PRE-ENGINEERED BUILDING

ENGINE

SCREEN

INSTRUMENT

E X H I B I T I . 5 X 1 8 M W W Ӓ R T S I L Ӓ E N G I N E S – UNA L L O C A T E D E S T I M A T E

MARITIME ELECTRIC COMPANY LTD LOCATION 2 5 X 18 MW RICE ENGINES

Estimate Totals

LANDSCAPING

PRE-ENGINEERED BUILDING

ENGINE

SCREEN

INSTRUMENT

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EXHIBIT J. BASIS OF ESTIMATE

Basis of Cost Estimate

Cost Estimate Nos.:

36484C – "1X0 SC LM6000 PC SPRINT WITH SYNCH CONDENSER"

- 36500C "ADD SYNCH CONDENSER ON EXISTING LM6000"
- 36501C "10 MW / 40 MWH BATTERY ENERGY STORAGE SYSTEM"
- 36503C "5X0 RICE & BESS GREENFIELD SITE SUBSTATION UPGRADES"
- 36641C "FIVE 18 MW RICE ENGINES"

Client Name: Maritime Electric Company, Ltd. Station: Prince Edward Island, Canada Project Number: A14782.003 Date: 09/24/2024

55 East Monroe Street Chicago, IL 60603-5780
Basis of Estimate

Table of Contents

1. Introduction

This document describes and identifies the basis upon which the cost estimate(s) mentioned herein have been developed by documenting the purpose, scope, methods, parameters, cost estimating methodology, strategy, assumptions, source information and exclusions.

The purpose of the estimate(s) is to provide capital cost information for either project planning, screening/feasibility, budgeting, project alternative evaluations. It is expected that the estimate(s) be used in a manner where the end usage takes into consideration the Estimate's Classification and accuracy of the represented costs.

The cost estimates were developed based primarily on experience on similar projects, conceptual design layout and configuration, and client input. Detailed engineering has not been performed to firm up the project details, and specific site characteristics have not been fully analyzed. We have attempted to assign allowances where necessary to cover issues that are likely to arise but are not clearly quantified at this time

2. General Information

- 2.1. Estimates:
	- Cost Estimate No.
	- 36484C "1X0 SC LM6000 PC With Synch Condenser"
	- 36500C "Add Synch Condenser On Existing LM6000"
	- 36501C "10 MW / 40 MWH Battery Energy Storage System"
	- 36503C "5X0 RICE & BESS Greenfield Site Substation Upgrades"
	- 36641C "Five 18 MW RICE Engines"

Estimates are provided to cover two options. The first utilizes estimates 36484C, 36501C, 36503C, and 36641C resulting in installation of a new LM6000 at a brownfield site on PEI, and a new 5x0 RICE installation with BESS at an alternate site on PEI. The second option utilizes 36500C resulting in installation of synchronous condensing capability on the existing LM6000 at Charlottetown.

- 2.2. Facility Locations: Prince Edward Island, Canada
- 2.3. Facility Type:
	- Existing Brownfield Peaker Site (36484C &36500C) on PEI
	- Greenfield Site (36501C, 36503C, and 36641C) on PEI
- 2.4. Capacity Rating:
	- Cost Estimate No. 36484C 1x0 50 MW Combustion Turbine Addition
	- Cost Estimate No. 36641C 5x18 MW RICE
- 2.5. Unit of Measurement: S.I.
- 2.6. Currency: Canadian Dollars (CAD) at conversion of 1.36 CAD to 1.00 USD

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3. Estimate Scope Description

Listed below is a summary level scope (not all inclusive) of facilities included in the estimate(s). See cost estimate(s) for a detailed listing of the work breakdown structure and scope.

- 3.1. Civil work
- 3.2. Structural work
- 3.3. Concrete work
- 3.4. Mechanical work
- 3.5. Electrical work
- 3.6. Instrumentation and controls
- 3.7. Power Distribution

4. Methodology

These estimates were developed using baseline estimates deemed to be representative of the required scope of facilities and cost and scope-adjusted using client input and cost/quantity factors based on parametric factors.

5. Estimate Classification

Based on the maturity level of the project definition deliverables and the estimating methods used, these estimate can be categorized as Class 4/5 estimate and assigned a probable accuracy range of +/- 30%. Accuracy range is calculated on the total cost estimate after the application of appropriate contingency.

The Association for the Advancement of Cost Engineering (AACE) International has established a classification system for cost estimates listed in the following table.

Estimate Class	Maturity Level of Project Definition Deliverables % of complete definition	End Usage Typical purpose of estimate	Methodology Typical Estimating Method	Expected Accuracy Range
Class 5	0% to $2%$	Concept screening	Capacity factored, parametric model, judgement, or analogy	L: -20% to -50% H: $+30\%$ to $+100\%$
Class 4	1% to 15%	Study or feasibility	Equipment factored or parametric models	L: -15% to -30% H: $+20\%$ to $+50\%$
Class 3	10\% to 40\%	Budget authorization or control	Semi-detailed unit costs with assembly level line items	L: -10% to -20% H: $+10\%$ to $+30\%$
Class 2	30% to 75%	Control or bid/tender	Detailed unit cost with forced detailed take-off	L: -5% to -15% H: $+5\%$ to $+20\%$
Class 1	65% to 100%	Check estimate or bid/tender	Detailed unit cost with detailed take-off	L: -3% to -10% H: $+3\%$ to $+15\%$

Source: (AACE International Recommended Practice No. 18R-97)

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This table illustrates typical accuracy ranges that are associated with process industries. AACE RP 104-19 explains accuracy. The +/- value represents typical percentage variation at an 80% confidence interval of actual costs from the cost estimate after application of contingency (typically to achieve a 50% probability of project overrun versus underrun) for given scope. Depending on the technical and project deliverables (and other variables) and risks associated with each estimate, the accuracy range for any estimate is expected to fall into the ranges identified, although extreme risks can lead to wider ranges.

6. Quantity Development

Quantities and scope of facilities to be cost estimated were based on parametrically-factored costs and quantities in the selected base estimates along with client scope input. Detailed engineering has not been performed to firm up the project details, and specific site characteristics have not been fully analyzed. Allowances have been assigned where necessary to cover issues that are likely to arise but are not clearly quantified at this time.

7. Structure and Coding of the Estimate

Standard coding and structure within the estimating system have been used in preparing the estimate. The structure of the estimate follows a predefined format whereas the cost information is organized and presented by grouping costs with similar attributes. The basic presentation of the overall estimate hierarchy follows:

- Direct Costs
- General Conditions Costs
- Project Indirect Costs
- Contingency

Within the direct cost group, the costs are segregated into 5 categories in columnar format in the estimate. The direct cost line items may further be grouped by areas or sub-areas and it is evident on the summary page if this formatting structure is used. The 5 categories are:

- 1. Subcontract Cost
- 2. Material Cost
- 3. Equipment Cost
- 4. Labor Cost
- 5. Construction Equipment Cost

A standard coding structure has been used to categorize each direct cost line item within the estimate. A sample of the commonly used codes in the standard coding structure of the estimating system at its highest level of the hierarchy follows. (Any estimate may contain one or more of these codes)

41.00.00 ELECTRICAL EQUIPMENT 42.00.00 RACEWAY, CABLE TRAY & CONDUIT 43.00.00 CABLE
44.00.00 CONTR 44.00.00 CONTROL & INSTRUMENTATION
51.00.00 SUBSTATION. SWITCHYARD. & TI SUBSTATION, SWITCHYARD, & TRANSMISSION 91.00.00 SITE OVERHEADS 92.00.00 OTHER CONSTRUCTION INDIRECT COSTS
93.00.00 PROJECT INDIRECT COSTS PROJECT INDIRECT COSTS 94.00.00 CONTINGENCY

8. Direct Costs

Direct field costs represent the permanently installed facilities and include subcontract costs, material costs, process equipment costs, labor costs and construction equipment costs. Each line item in the estimate may have any combination of these cost categories.

All estimated costs have been escalated or re-priced to current 2024 Canadian dollars.

There are 5 direct cost categories that make up the direct costs of the estimate and are discussed as follows.

8.1. Process Equipment Cost Category

Pricing for permanently installed equipment is based on S&L in house data, vendor catalogs, industry publications and other related projects, with exception of the following items for which a budgetary vendor quote was received. Vendor quotes are furnish-only unless otherwise noted.

• Quotes were received for the LM6000 CT, major transformers, and new tanks in revision A (dated September 2023). These quoted costs have been adjusted to current dollars for this revision."

Equipment pricing was reviewed to ensure that the following criteria were addressed and taken into consideration where deemed necessary:

- Allowance for attendance by vendor representatives for technical field assistance
- Freight
- Spare parts

8.2. Material Cost Category

Pricing for permanently installed materials are based on S&L in house data, vendor catalogs, industry publications and other related projects, with exception of the following items for which a budgetary vendor quote was received.

• No quotes solicited for this estimate.

8.3. Labor Cost Category

Development of construction labor cost takes into account the quantity, wage rates, installation hours, labor productivity, labor availability and construction indirect costs. A more detailed description and methodology follows.

8.3.1. Installation Hours

Installation hours represent the labor/man-hours to install an item and collectively all craft hours to install the entire scope of facilities. These include the time of all craft personnel and supervisors and include time spent in inductions, training, toolbox meetings, clean-ups and bus drivers. Sargent & Lundy maintains a database of standard unit installation hours. The database represents standard installation rates for US Gulf Coast Region. Standard unit installation rates were applied to the quantities and equipment in the estimate. The resultant hours were further adjusted for local productivity (described below). Manhours associated with subcontract labor cost are not represented in the estimate.

Equipment setting labor/man-hours were developed using a combination of several techniques. Installation was developed using equipment weights, equipment size, fabrication completeness upon delivery and location congestion.

Both bulk material and equipment installation labor/man-hours may also be based on anyone of the many public domain resources readily available and at our disposal.

8.3.2. Labor Productivity

In evaluating productivity, factors such as jobsite location, type of work and site congestion were considered. A regional labor productivity multiplier of 1.15 is included based on Compass International Global Construction Yearbook. The use of this productivity factor is an approach to compare construction productivity in various locations in the USA to a known basis or benchmark of 1.00 for Texas, Gulf Coast productivity. Productivity multiplier does not include weather related delays. Effectively, this factor increases the installation hours (or decreases productivity) in proportion to the factor and is driven by jurisdictional guidelines set forth in union work and/or individual craftsperson capabilities.

8.3.3. Labor Wage Rates

Labor profile: Prevailing wages for Prince Edward Island, Canada.

Craft labor rates were developed based on input from MECL originally received in 2023 and now escalated at 2% on all craft based on review of escalation of labor per R.S. Means per 2023 and 2024 wage rates for nearby Halifax, Nova Scotia, and Moncton, New Brunswick, Canada. Crew rates are used in the estimate, not the individual craft rates. Construction indirect and general conditions costs are not included in the crew rates. These costs are itemized separately.

8.4. Construction Equipment Cost Category

Construction equipment cost is included on each line item as needed based on the type of activity and construction equipment requirements to perform the work. It includes costs for rental of all construction equipment, fuel, oil and maintenance. Equipment operators are included with direct labor costs.

Depending on the nature of the work, additional cost for construction equipment and operators such as heavy lifting cranes may be required to perform the work activity which would then be included as a separate line item and included in the subcontract cost category. For this project, a supplemental construction equipment cost is not necessary.

8.5. Subcontract Cost Category

Subcontract costs as defined within this estimate are all inclusive costs. It has nothing to do with the contracting strategy or subcontractors. A subcontract cost simply does not include any additional markups such as "General Conditions", "Overheads" or "Other Construction Indirect Costs". Subcontract costs are subject to and included in the EPC Fee, contingency and escalation calculations if applicable. Subcontract costs may or may not have a labor component and as such do not identify associated installation labor/man-hours.

9. Construction General Conditions Costs

The estimate(s) are constructed in such a manner where most of the direct construction costs are determined directly and several direct construction cost accounts are allowances and determined indirectly by taking a percentage of the directly determined costs. These percentages are based on our experience with similar type and size projects. Listed below are the additional costs included unless noted as not included.

9.1. Additional Labor Costs:

- Labor Supervision (additional pay over that of a journeyman)
- Show-up time
- Cost of overtime pay and inefficiency due to extended hours is included, based on working a 50-hour work week (5x10-hour days.)
- Per diem is included at \$20 CAD/hr (\$200 per workday).

9.2. Site Overheads

- Construction Management (Includes project manager, superintendents, project controls, site clerical)
- Field Office Expenses (trailer rental, furniture, office equipment, computers, site communication, office supplies)
- Material & Quality Control (inspectors, quality assurance personnel)
- Material Handling (Labor cost to receive, unload & properly store material and equipment delivered to the site. Includes materials management. Labor to retrieve materials and equipment from storage and deliver to the worksite.)
- Safety program administration and personnel. (Includes safety manager, personal protective equipment, drug testing kits including lab fees, jobsite orientation materials and materials required to maintain a safe jobsite)
- Temporary Facilities (Includes any temporary structures or utilities required at the job site such as: temporary warehouse, change trailers, site security, temporary electric grid, water consumed during construction, trash hauling fees, sanitary facilities)
- Indirect Craft Labor (Includes tool control, training, welder certification, fire watch, site cleanup, dust control)
- Mobilization/Demobilization to the jobsite
- Legal Expenses/Claims

9.3. Other Construction Costs:

- Small Tools and Consumables
- Scaffolding (includes rental, erection & removal)
- General Liability Insurance (covers premiums likely to be incurred)
- Construction Equipment Mobilization/Demobilization

- Freight on Material
- Freight on Process Equipment included with equipment cost
- Sales Tax not included

10. Project Indirect Costs

Listed below are additional project indirect costs included unless noted as not included:

- EPC Engineering Services included
- EPC Start-up and Commissioning Support 2% of total project cost (excluding major equipment procured by OWNER)
- Start-Up Spare Parts 0.3% of the process equipment cost
- EPC G&A Expense included at 7% of total project cost (excluding major equipment procured by OWNER)
- EPC Risk Fee and Profit included at 10% of total project cost (excluding major equipment procured by OWNER) – per Clients request.
- Owner's Engineer included
- CM and Start-up and Commissioning $(3rd$ party) not included
- Owners costs included at 3%
- Warehouse Spares included as lump sum as follows:
	- \circ 36484C "1X0 SC LM6000 PC with Synch Condenser" \$1,000,000
	- o 36500C "Add Synch Condenser On Existing LM6000" \$100,000
	- o 36501C "10 MW / 40 MWH Battery Energy Storage System" not included
○ 36503C "5X0 RICE & BESS Greenfield Site Substation Upgrades" \$150,0
	- o 36503C "5X0 RICE & BESS Greenfield Site Substation Upgrades" \$150,000
○ 36641C "Five 18 MW RICE Engines" \$1.000.000
	- o 36641C "Five 18 MW RICE Engines" \$1,000,000

11. Scope of Work by Owner

The 3% allowance for Owner's costs is intended to cover the items listed below:

- Owner's Staff Project management, Construction Management, on-site engineering and services, procurement services
- Per diem/Travel expenses for Owner's Personnel assigned to site
- Site Facilities for Owner's Personnel, Construction Management, and Start‐Up & Commissioning (offices/trailers, guard houses, furniture, signage, staff parking, vehicles, access control, computer network/servers, safety equipment, etc.)
- Site Services for Owner's Personnel, Construction Management, and Start‐Up & Commissioning (Telephone, electricity, natural gas, potable water, sewage, sanitary, garbage collection, recycled materials/metals collection (may also be collected from contractors, depending on Owner's policy), snow removal, dust control, janitorial services, internet, cable services, reprographics, etc.)
- Construction power source/consumption services. Distribution (transformer, cable, switchboard, etc.) of construction power is included in the direct costs.
- Safety Incentives (any Owner's safety incentive program, over and above contractor's programs)
- Site security guards during construction
- Traffic control facility at the gate (badging, timecard system, etc.)
- Station Operators, I&C Technicians, Relay Technicians, DCS Programmers, Test Equipment
- Lock‐out/Tag‐Out Program (personnel, procedures, and hardware)
- Plant Staff Training (time for personnel being trained is Owner's cost. Also includes Owner's time for preparation and/or modification of plant operating procedures.)
- Laboratory, workshop, etc. equipment and instruments

- Legal and accounting fees
- Payment and Performance Bonds
- Insurance (example Builder's Risk)
- Project financing
- Permitting (considered to be a project development cost)

12. Contingency

Based on project definition, contingency costs are included in the estimate as separate line items as follows:

The rates relate to pricing and quantity variation in the specific scope estimated. The contingency does not cover new scope or exclusions outside of what has been estimated, only the variation in the defined scope. The rates do not represent the high range of all costs, nor is it expected that the project will experience all actual costs at the maximum value of their range of variation. The addition of contingency improves the probability of not having a cost overrun. Even with the inclusion of contingency, the estimate is still subject to a cost overrun in accordance with the accuracy range previously defined.

13. Escalation

Escalation is not included. All costs are provided in 2024 CAD.

14. Contracting Approach

The estimate is based on an Engineer – Procure – Construction (EPC) single contract approach. This approach basically has one main contractor, typically a firm with the capability, resources and finances to produce the design, procurement of goods and services and provide construction and construction management services during construction. (Note that the EPC contract approach was also successfully utilized in the MECL 2005 CT3 construction project.)

The EPC contractor is responsible for ensuring the necessary engineered equipment and engineered bulks for the project are procured either directly or indirectly through subcontractors, although there can be exceptions.

Installation is achieved through using many resources including multiple subcontractors. Contractors are responsible for purchasing non-engineered bulk materials. Contractors will apply a markup on the value of non-engineered bulk materials for overhead and profit as mentioned in Section 9.3 above.

The EPC firm is responsible for all warranties for equipment, plant performance, pricing and schedule guarantees. The additional cost (beyond subcontractors G&A and Profit fees) or mainly the value for such warranties and guarantees and financial risks are reflected in the additional "EPC Fee" included in the estimate. Professional engineering, professional construction management & professional startup services are not included in this "EPC Fee" and itemized separately.

15. Notes/Assumptions/Clarifications

- 15.1. All estimates (excluding 36501C for the BESS) are provided in both "allocated" as well as "unallocated" versions. The unallocated versions show all individual estimate cost details with the General Conditions, Project Indirects, and Contingency costs broken out separately on page 3 of the estimates. The allocated versions are provided as summary-level estimates that incorporate all indirect costs into each line item to provide an estimated total cost for each of the cost groupings as if priced separately by an EPC contractor. (Note that the BESS estimate is based on subcontract costs only, and therefore, the allocated and unallocated versions would be identical.)
- 15.2. All CTs/engines are installed to operate on low sulfur diesel as the primary fuel with bio-diesel storage provided separately.
- 15.3. SCRs are included for all CTs and engines. CT SCRs are based on aqueous ammonia, and RICE SCRs on urea.
- 15.4. The new RICE/BESS facilities buildings are limited to engine halls with bathroom and storage pole-barn construction warehouse.
- 15.5. Black start capability with a black start diesel generator is provided for the new CT at Charlottetown.
- 15.6. Black start capability with a black start diesel generator is provided for the RICE facility.
- 15.7. First fills of diesel and bio-diesel are not included for the CT and RICE facilities.
- 15.8. Generator foundation modifications for installation of the synchronous condenser capability (estimate 36500C) assumes that the existing foundation will be lengthened and that piles are not required.
- 15.9. Major equipment will be purchased directly by Owner, and not by EPC. This includes:
	- 15.9.1. Combustion Turbine & SCR (36484C)
	- 15.9.2. CT GSU (36484C)
	- 15.9.3. RICE Engine Package (36641C)
	- 15.9.4. RICE GSU (36641C)
	- 15.9.5. Synchronous Condenser OEM package (36484C and 36500C)
	- 15.9.6. Substation Transformer (36503C)

APPENDIX B

Project Timelines (Gantt Charts)

APPENDIX C

Sargent and Lundy Capacity Resource Study

All our energy. All the time.

February 10, 2023

Island Regulatory and Appeals Commission **PO Box 577** Charlottetown PE C1A 7L1

Dear Commissioners:

As a component of the 2022 Capital Budget, Maritime Electric engaged Sargent & Lundy, a globally recognized engineering consultant with expertise in power systems and energy supply, to undertake a study that examines the Company's energy needs, capacity source options, and the potential impact of each option in terms of emission reductions. The Capacity Resource Study that it recently completed is attached. This submittal letter also serves to highlight Sargent & Lundy's recommendation about the need to improve security of supply, given the developing capacity shortage in the Maritimes due to electrification and the federally mandated closure of all coal fired generation by 2030. The Sargent & Lundy report also notes the role on-Island capacity will play in further development of renewable energy resources on PEI.

As indicated in the Capacity Resource Study, Maritime Electric has both energy and capacity obligations. The energy obligations are associated with providing a continuous supply of electricity to customers, and the capacity obligations are associated with the Interconnection Agreement between Maritime Electric and NB Power. The reliability standards for the Maritimes area are established by the Northeast Power Coordinating Council ("NPCC"), under which NB Power operates and to which Maritime Electric is obliged to meet.

Capacity obligations are necessary to ensure that customer demand for electricity can be met by electrical utilities the vast majority of the time. The North American Reliability Standard, established by the North American Electricity Reliability Corporation ("NERC"), allows for a loss of generating capacity supply totalling one day every ten years. For this reason, electrical utilities are required to have enough capacity to meet their peak load plus 20 per cent, commonly referred to as planning reserve.¹

For 2023, Maritime Electric has an estimated planning reserve capacity obligation to NB Power of 311 megawatts ("MW"), which it will meet through the resources shown in the table below.

Effective load carrying capacity ("ELCC") of a generator reflects how much the generator is able to contribute toward system resource adequacy (i.e., be counted as a capacity resource).

b. Maritime Electric is entitled to approximately five percent of energy and capacity associated with NB Power's Point Lepreau Nuclear Generating Station through a long-term participation agreement.

Short-term capacity purchases currently represent 55 per cent of capacity resources to meet reliability obligations. C.

Maritime Electric is under NB Power's control authority and not directly obligated to meet NERC and NPCC planning reserve requirements, but the Company's Interconnection Agreement with NB Power requires it to have enough capacity to meet its firm peak load plus 15 per cent.

Maritime Electric meets it capacity obligations through a combination of owned on-Island generation and short-term contracted capacity purchases. The cost of owned capacity tends to be very stable as it reflects the long-term period for the financial recovery over the life of the asset. The cost of contracted short-term purchased capacity can be highly variable, as it depends upon capacity supply and demand within the region.

In the near term, demand for regional capacity will increase due to a combination of load growth from continued electrification and coal fired generating plant retirements.² This is expected to reduce the availability of short-term purchased capacity and increase the price Maritime Electric will have to pay. The Sargent & Lundy report concludes that, as the need for additional capacity in the winter peaking Maritime region becomes more apparent³ and considering that Maritime Electric has to source and pay for capacity regardless of where it is located, the benefits for adding new capacity as on-Island emergency backup generation are evident.

Security of Supply Issues Addressed with Back-Up Generation

The future tightening of regional capacity resource levels has been identified in recent integrated resource plans in Quebec, Nova Scotia and New Brunswick. Hydro Quebec is now tendering inprovince generation projects to address their shortfall by 2026. NB Power's Mactaquac Hydro Generating Station will have reduced output from 2027 to 2030 for its refurbishment program. Both Nova Scotia Power and NB Power have to decommission their coal generating stations by 2030 to meet federal guidelines. This total of 1,701 MW of coal fired generation represents 25 per cent of the Maritime provinces current generating capacity. With electrification growing in the region, supply-side capacity reductions combined with demand-side capacity increases will result in a capacity shortage in the Maritimes. Without new capacity being built in the region, affordability will be a challenge as higher capacity pricing will result from external purchases (i.e., from outside the Maritimes) if the capacity is even available. As such, there is significant risk that there will not be sufficient capacity available to purchase in the Maritime provinces.

Increased Carbon-Free Energy Enabled with Back-Up Generation

The goal for all provinces and utilities to procure carbon-free energy will increase demand for renewable energy sources, especially those with high capacity factors (i.e., not considered intermittent) such as large-scale hydro. These renewable sources (e.g., large-scale hydro) may be purchased on either an interruptible or non-interruptible basis, with interruptible being cheaper. However, the interruptible pricing option is only available to utilities that have sufficient source capacity.⁴ In addition, having sufficient source capacity allows a utility to purchase energy from greater distances, increasing available options. On-Island backup-generation will position Maritime Electric as a more attractive customer to suppliers of interruptible renewable energy. It will also allow for increased renewable energy supply from greater distances (i.e., northern Quebec and Labrador) as suppliers will know that the Company can provide for short-term backup due to supply interruption or the loss of high voltage transmission systems over these greater distances.

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Due to the Federal Government requirement that all coal power plants in Canada be retired by 2030, Nova Scotia $\overline{2}$ will lose 1,234 MW, and New Brunswick will lose 467 MW, of current regional operational capacity.

The NERC 2022-2023 Winter Reliability Assessment indicates that there is currently sufficient capacity for a typical 3° load in the Maritimes area, but the region will be short on capacity should an extreme event, such as a polar vortex, occur. Texas, which is the only NERC assessment area with a higher capacity shortfall than the Maritimes area in extreme winter conditions, experienced widespread outages, loss of life and significant economic loss as the result of such an event in early 2022.

This capacity is required to generate energy during those instances when the energy supply is interrupted by the supplier.

On-Island Back-Up Generation Supports Affordability

Additional on-Island back-up generation supports the affordability of electricity and has the capability to run on renewable fuel sources such as biodiesel, hydrogen, etc.⁵ It will provide greater price certainty for a larger portion of the Company's capacity needs at a time when significant challenges and turbulence will be present in the Maritime area capacity market. When negotiating energy supply contracts, additional on-Island back-up generation allows for the purchase of a variety of energy supply products by leveraging the value of the installed back-up capacity. While this on-Island back-up generation resource would not be expected to continually run, the supplier knows that if they have to interrupt contracted energy supply for their own system events, that the customer has the ability to serve their own load. As a market participant and "price taker", this is important to Maritime Electric's customers to achieve the most attractive energy supply cost pricing available.

Further Assessment

In consultation with stakeholders, Maritime Electric intends to further study and determine the best mix and location(s) for the addition of on-Island back-up generation. This will include the development of models to determine the amount of intermittent wind and solar generation that can operate with existing and projected on-Island capacity sources. The installation of additional on-Island back-up generation will provide significant value and protection, and fulfill an integral role in achieving Prince Edward Island's path towards net zero by 2040, Maritime Electric's sustainability goals and the continued affordability of electricity.

In addition, the recent events of the Polar Vortex of February 3-5 have provided significant experience and important statistics that warrant an addendum being developed by Sargent & Lundy. Maritime Electric has requested this be carried out and will submit the addendum when it is completed.

Yours truly,

MARITIME ELECTRIC

Angus S. Orford Vice President, Corporate Planning & Energy Supply

ASO01 Enclosure

The capacity Resource Study recommends reciprocating internal combustion engines that can run on various fuel sources.

Capacity Resource Study

Evaluation of Various Technology Options for Maritime Electric Company

Prepared for

Maritime Electric Company, Ltd.

Prepared by Sargent & Lundy

Report SL-017203 FINAL December 9, 2022 Project 14782.001

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L E G A L N O T I C E

This deliverable was prepared by Sargent & Lundy Canada Company (S&L) expressly for the sole use of Maritime Electric Company, Ltd. (Client) in accordance with the contract agreement between S&L and Client. This deliverable was prepared using the degree of skill and care ordinarily exercised by engineers practicing under similar circumstances. Client acknowledges: (1) S&L prepared this deliverable subject to the particular scope limitations, budgetary and time constraints, and business objectives of Client; (2) information and data provided by others, including Client, may not have been independently verified by S&L; and (3) the information and data contained in this deliverable are time-sensitive and changes in the data, applicable codes, standards, and acceptable engineering practices may invalidate the findings of this deliverable. Any use or reliance upon this deliverable by third parties shall be at their sole risk.

Capacity Resource Study

Sargent & Lundy is one of the longest-standing full-service architect engineering firms in the world. Founded in 1891, the firm is a global leader in power and energy with expertise in grid modernization, renewable energy, energy storage, nuclear power, fossil fuels, carbon capture, and hydrogen. Sargent & Lundy delivers comprehensive project services – from consulting, design, and implementation to construction management, commissioning, and operations/maintenance – with an emphasis on quality and safety. The firm serves public and private sector clients in the power and energy, gas distribution, industrial, and government sectors.

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Capacity Resource Study

VERSION LOG

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ISSUE SUMMARY AND APPROVAL PAGE

This is to certify that this document has been prepared, reviewed, and approved in accordance with Sargent & Lundy's Standard Operating Procedure SOP-0405, which is based on ANSI/ISO/ASSQC Q9001 Quality Management Systems.

Contributors

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Reviewed by:

Approved by:

9 December 2022

Matthew Thibodeau Senior Vice President

Capacity Resource Study

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Capacity Resource Study

A C R O N Y M S A N D A B B R E V I A T I O N S

Capacity Resource Study

E X E C U T I V E S U M M A R Y

Sargent & Lundy (S&L) was engaged by Maritime Electric Company (Maritime Electric or MECL) in mid-2022 to develop this Capacity Resource Study for the purposes of evaluating a variety of different electricity capacity resource technologies, developing cost estimates, and recommending technologies well suited to help Maritime Electric cost-effectively achieve its most critical goals and needs.

From the perspective of this Capacity Resource Study, Maritime Electric's key goals and needs that are the focus of the resource selection process are summarized as follows:

1) **Meeting Both Energy and Capacity Obligations:** Maritime Electric must meet both a) energy obligations and b) regional capacity obligations.

Energy obligations are those associated with Maritime Electric meeting the system's electrical load continuously throughout the day. For example, if system load (i.e., demand) is 200 MW at a certain point during the day, Maritime Electric might be able to meet this load with 70 MW generated from the on-island wind farms and 130 MW from electricity imported from the mainland. As system load and wind generation changes throughout the day and over the course of the year, the amount of electricity purchased from the mainland, or occasionally generated by on-island generators, changes with time.

Capacity obligations are the share of reserved capacity that electric utilities must have, such that the Northeast Power Coordinating Council (NPCC) reliability standards for the Maritimes Area (which consists of Prince Edward Island [PEI], New Brunswick, Nova Scotia, and northern Maine) are met. The NPCC capacity standards are established to help maintain a stable and reliable electrical system. Load serving entities, such as Maritime Electric, are required to contribute to meeting the standards set by NPCC by having a sufficient amount of reserved capacity.

For reference, the types of resources that Maritime Electric can utilize to meet its capacity obligations are listed below. Maritime Electric can either own these resources on-island, or Maritime Electric can purchase the capacity from power plants (or energy storage facilities) located on PEI or off-island via an agreement.

• **Demand Response / Demand Side Programs**: Demand response programs (also known as demand side management or DSM) incentivize customers to shift/reduce electrical usage during certain times. The net result of these programs is that they help the utility better balance supply and demand. For the purposes of capacity planning, demand response is considered a dispatchable resource and can be counted towards meeting capacity obligations due to the fact that it helps utilities reduce peak demand.

Capacity Resource Study

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Sargent & Lundy I

- **Energy Storage**: Energy storage systems are effective sources of capacity that Maritime Electric could utilize to meet its capacity obligations. Energy storage systems are considered dispatchable resources.
- **Dispatchable Generators**: A dispatchable generator is one where the operator has control over when the unit is on/off and at what MW output level the generator is operating at. Some examples of common dispatchable generator technologies include engines and combustion turbines. Dispatchable generators are well suited to help Maritime Electric meet its regional capacity obligations.
- **Non-Dispatchable Generators**: These generators are those where the operator only has partial control over generator operation. For example, the MW output level of the wind farms on PEI are dependent on the wind speed, which can vary over the course of the day. Per industry requirements, Maritime Electric can only count a portion of a non-dispatchable generator's nameplate capacity towards meeting its regional capacity obligations (e.g., Maritime Electric is only able to count less than 25% of the total wind nameplate capacity – additional information is provided in Section [2.2.1](#page-336-0) and [Appendix C\)](#page-432-0). The reason for this is that when electric utilities calculate capacity contributions, they are required to account for both the resource's intermittency and timing of when the resource generates with respect to when system load is highest. Thus, while non-dispatchable generators are well suited to help Maritime Electric meet its energy obligations (thus reducing overall carbon emissions), they are not well suited to help Maritime Electric meet its regional capacity obligations.

One of the benefits of having a higher amount of capacity installed on PEI, versus purchased from mainland power plants, is that it helps to insulate Maritime Electric's customers from a likely future regional capacity shortage in northeastern Canada as a result of increasing regional demand, the retirement of all Canadian coal power plants by 2030, and a lack of adequate regional transmission infrastructure. For reference, the following table illustrates Maritime Electric's historical and estimated future capacity obligations, including the share of capacity met with on-island and mainland resources. Since the mid-2010's, the share of Maritime Electric's on-island capacity has fallen significantly due to on-island power plant retirements and increasing system load.

Capacity Resource Study

Table ES-1 — Capacity Obligation and Resource Outlook

Notes/Sources:

- 1) The above on-island capacity accounts for the appropriate conversion of nameplate capacity to effective capacity (i.e., including the effective load carrying capability of the generator, or ELCC) for non-dispatchable generators (such as the wind power plants), per industry requirements. Further discussion is provided in Section 2.2.1 and Appendix C.
	- 2) **Improving Maritime Electric's Ability to Serve Load if PEI is Electrically Disconnected from the Mainland:** A scenario where PEI is electrically disconnected from the mainland is considered an emergency scenario, and has historical precedence (since 2004, there have been nine times when PEI was either fully or partially disconnected from the mainland). During this emergency situation, on-island resources alone would have to be used to meet load and stabilize the electrical system. If PEI is fully disconnected, Maritime Electric would currently be forced to implement rolling blackouts due to the fact that there is not enough on-island generation to meet the full electrical system load. Given that the amount of on-island capacity has fallen over the last decade due to retirements, future rolling blackouts are likely to be more severe than they have been for PEI in the past. This leaves Maritime Electric's customers exposed to significant financial and health/safety risks.

An important point to note is that during a disconnection from the mainland, only a small portion of the on-island wind generation could be used to meet load. This is due to the fact that there is not enough dispatchable generation capacity installed on-island to be able to fully balance the generation intermittency from the large number of on-island wind generators. Without curtailment of a portion of the wind generation, there is a substantial risk of overwhelming the on-island dispatchable generators and throwing system supply and demand out of balance, which could lead to the collapse of the electrical system. At best, it is estimated that currently a maximum of 37% of all the wind generation on PEI¹ can be utilized during a full disconnection of PEI from the mainland, depending on wind conditions. This value falls to 0% in the event the largest on-island generator (Charlottetown CT3) is out of service.

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¹ This is based on energy from all wind generation located on-island, which includes facilities supplying both on- and off-island customers.

The following figure shows a comparison of the historic Maritime Electric winter load to the amount of load that could be served during a disconnection of PEI from the mainland. The figure presents the distribution of historic hourly winter load (January through March and October through December) from the years 2018 through 2021. As an example, the figure illustrates that system load was approximately 190 MW for just under 12% of the hours in winter months between 2018 through 2021. During this time period, the average system load was 173 MW. Overlaid on the figure are how much load Maritime Electric will be able to serve during a disconnection of PEI from the mainland if 1) all of its dispatchable generators are available and 2) if Charlottetown CT3 is out of service. The figure illustrates that the historic system electrical load in the winter is typically far higher than the amount of electricity (in megawatts) that could be provided during a disconnection of PEI from the mainland.

Figure ES-1 — Historical System Winter Load Histogram (2018-2021)

Comparison to the Amount of Load MECL Could Serve During a Disconnection of PEI from the Mainland

For reference, both new dispatchable generators and / or energy storage could help Maritime Electric better manage situations where PEI is disconnected from the mainland. The amount that energy storage resources could help depends on a number of variables, including the charge level of the storage resource at the moment the disconnection occurs, the length of the disconnection, and whether / how much the PEI wind power plants are generating electricity during the disconnection. Due to these variables, there is significant uncertainty surrounding how beneficial energy storage resources would be during a disconnection of PEI from the mainland.

3) **Achieve Sustainability Targets:** Maritime Electric has established a greenhouse gas emissions reduction target to reduce emissions by 55% by 2030 (from 2019 levels). At present, Maritime Electric serves system load with a number of different resources; however, the majority of the energy it uses to serve load is purchased from the mainland, from New Brunswick Energy Marketing (NBEM). Energy supplied by NBEM is generated with many different resources, including renewable generators (e.g., the hydroelectric Mactaquac Generating Station) and also generators that create carbon emissions.

A breakdown of Maritime Electric's historical generation and carbon emissions by source is provided in the following table. For reference, the energy purchased from NBEM provides a number of additional services beyond simply meeting load. Given PEI's large fleet of wind generators and the fact that wind power plants are intermittent resources, other resources that can balance the generation from the wind farms are needed. The generators that provide the balancing energy to Maritime Electric are located on the mainland and their energy is purchased through NBEM. NBEM also provides Maritime Electric additional ancillary services that help to maintain the stability of the PEI electrical system.

Table ES-2 — Historical Generation and Carbon Emissions by Source

Notes/Sources:

- 1) Historical generation data provided by Maritime Electric.
- 2) Carbon emissions rates for Maritime Electric are taken from the 2022 Maritime Electric Sustainability Report [\(https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf\)](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf).
- 3) The average historical net generation of Maritime Electric's generators is -0.5 GWh, due to the fact that these units are primarily on standby (and to be kept on standby the generators must draw a small amount of electricity from the grid). In addition, between 2019 and 2021 the Charlottetown oil-fired generators used an average of 3.3 GWh per year while being retired from service. Shown in the above table is the generation of the diesel generators, not including the relatively small amount of electricity they used from the system. The total system generation would average 1,403.5 GWh if both the net generation from the diesel generators and the electricity used by the Charlottetown oil-fired generators was considered.

Capacity Resources Considered

Technologies in this study were ultimately selected based upon three different selection steps: a primary, secondary, and final screening. As part of this process, S&L developed cost estimates (2022 Canadian

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dollars) of the different technologies, considering the unique economic- / location-related specifics of PEI. Much of S&L's work is in either designing or providing project oversight through the development, construction, and operation of different generation and energy storage projects. We maintain detailed internal cost databases of project data. As a result, the cost estimates developed for this study are based on actual cost data for recent projects that are either being built or are operating.

The list of technologies initially considered for this study is provided below:

- Wind power, both onshore and offshore
- Solar power, both photovoltaic (PV) utility and rooftop scale, and concentrating solar power (CSP)
- Battery energy storage systems (BESS), lithium-ion, other storage technologies
- Reciprocating internal combustion engine (RICE), operating both on traditional and renewable fuels
- Combustion turbines (CT), aeroderivative models, operating both on traditional and renewable fuels
- Biomass power plant, operating on different types of biomass
- Nuclear power plant, small modular reactor (SMR)
- Tidal power plant or wave power plant
- Geothermal power plant
- Fuel cells

Final Resource Portfolio Selection

The final shortlisted resources are listed in the following table, along with their per kW costs and notes pertaining to their ability to help meet Maritime Electric's most critical goals/needs.

Table ES-3 — Comparison of Final Shortlisted Resources

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From the final shortlisted resources, various potential portfolios were developed for consideration and final recommendation. The final portfolios considered are listed below:

- Portfolio A: BESS (lithium-ion) + onshore wind + solar PV (utility-scale and rooftop)
- Portfolio B: BESS (lithium-ion) + RICE + onshore wind + solar PV (utility-scale and rooftop)
- Portfolio C: BESS (lithium-ion) + CTs + onshore wind + solar PV (utility-scale and rooftop)
- Portfolio D: RICE/CTs + onshore wind + solar PV (utility-scale and rooftop)

Note that each of the above portfolios also assume the continued implementation and growth of the PEI DSM program. The portfolios were evaluated based on a number of criteria, including cost, Maritime Electric's most critical goals/needs, and other important considerations. As highlighted above, Maritime Electric's most critical needs are 1) meeting its energy and capacity obligations, 2) serving system load at all times, including during situations when PEI is electrically disconnected from the mainland, and 3) achieving sustainability targets.

The recommended portfolio was Portfolio D, with RICE recommended over CTs. The reasoning is as provided as follows.

The combination of RICE, onshore wind, and solar PV would provide Maritime Electric with carbon-free generation to help meet both its energy obligations and sustainability targets (via the wind and solar PV), along with capacity to meet its regional capacity obligations (via the RICE). The wind and solar PV would reduce the amount of energy needed to be purchased from NBEM. In addition, the combination of this additional energy from the wind and solar PV projects, combined with the capacity from the RICE, will help to provide a buffer against potential future regional market price volatility in energy and capacity.

Because a RICE power plant would primarily serve as a backup generator, the fact that a RICE generates carbon emissions will not substantially impact Maritime Electric's ability to meet sustainability targets, but it could create a stranded asset problem for Maritime Electric if the government of Canada begins enforcing stricter rules on allowable fuels for power generation. One distinct advantage of RICE is that it can operate on fuels the government of Canada considers to be renewable, such as biodiesel. A RICE can operate on biodiesel, with only minimal modifications required to the balance of plant equipment/storage. The lifecycle carbon emissions of biodiesel are much lower than that of traditional diesel. The fact that RICE can operate on renewable fuels helps Maritime Electric avoid the risk that a new RICE power plant would become a stranded asset in the future if fuel regulations change.

A RICE power plant would also significantly help Maritime Electric during a disconnection from the mainland. The addition of RICE to PEI would provide Maritime Electric more dependable dispatchable capacity to both serve load and also to balance the wind generation intermittency during a disconnection,

which would in turn allow Maritime Electric to utilize more of PEI's wind capacity without risking an imbalance of generation and load. For reference, while a BESS project could help support the system during a disconnection from the mainland in many of the same ways, the level of support it can provide depends on the BESS' state of charge when the disconnection occurs, generation from on-island wind/solar PV, and the length of the disconnection, which are all unknowns. As a result, a BESS is not a reliable resource to support the electrical system during a disconnection of PEI from the mainland.

We estimate that a minimum of 85 MW of dispatchable capacity needs to be added to the system to be able to bring the ratio of total dispatchable capacity versus winter peak load back in line with historical levels (see Section [2.2.4](#page-343-0) for additional discussion). Without this level of additional capacity, it is highly likely that future rolling blackouts (that might occur as a result of a disconnection of PEI from the mainland) will be much more severe than those that have occurred in the past. This capacity should be installed as soon as possible. Additional capacity beyond 85 MW will be required to replace the retirement of the Borden Generating Station generators, expected near 2030.

The following tables provide the forecasted capacity, energy, and emissions sources for Portfolio D. The new reciprocating engines in the table below are assumed to be online by 2025 and operated on biodiesel.

Table ES-4 — Estimated Portfolio D Capacity Sources

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Table ES-5 — Estimated Portfolio D Energy Sources

Table ES-6 — Estimated Portfolio D Emissions Sources

Notes

1) Carbon emissions rates related to purchases from NBEM are based on 2019, 2020, and 2021 data compiled by Maritime Electric and contained in the 2022 Maritime Electric Sustainability Report [\(https://www.maritimeelectric.com/Media/1959/2022](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf) [sustainability-report_final_interactive-pdf_july-28-2022.pdf\)](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf). Note the NBEM emissions rate (on a tonnes CO₂e per GWh basis) used to calculate carbon emissions is kept consistent for all the years shown in the table above; however, this rate is expected to fall with time as mainland utilities pursue various decarbonization strategies.

2) Biodiesel emissions assume B100 fuel is used and are calculated assuming the lifecycle emissions (from the production of the B100 fuel through combustion) are 70% less than traditional diesel fuel. The actual lifecycle emissions may vary based on a number of factors, including fuel composition, production method, etc. Note that the Canadian government considers biodiesel as a renewable fuel.

The reason BESS was not included in the recommended portfolio was primarily because of two reasons. First, a BESS solution is not as effective as the other shortlisted technologies at helping Maritime Electric meet its most critical needs. For reference, Maritime Electric's most critical needs are defined as 1) meeting its energy and capacity obligations, 2) serving system load at all times, including during situations when PEI is electrically disconnected from the mainland, and 3) achieving sustainability targets. Additionally, a BESS solution is a higher cost option than the other shortlisted technologies.

It is important to note that a BESS solution could offer some additional advantages for Maritime Electric beyond its most critical needs, such as allowing Maritime Electric to pursue an energy arbitrage strategy (if they wished to participate in an energy marketplace in the future), providing various ancillary services and

other system electrical support, and helping to manage times when there is excess wind generation (which does not occur frequently today, but will occur more frequently in the future as more onshore wind is integrated onto PEI). If it were determined that a BESS solution should be pursued, we recommend Maritime Electric pursue, potentially in coordination with interested PEI stakeholders, development of a demonstration 4-hour BESS project. As a demonstration project, Maritime Electric and PEI would be better able to assess which functions/use cases future BESS projects might be utilized for to maximize the benefit for PEI and Maritime Electric's customers.

Capacity Resource Study

1 . I N T R O D U C T I O N

Sargent & Lundy (S&L) was engaged by Maritime Electric (or MECL) in mid-2022 to develop this capacity resource study for the purposes of evaluating a variety of different capacity resource technologies, developing detailed cost estimates, and recommending the technologies best suited to helping Maritime Electric achieve its most critical goals/needs.

At a high level, this report was developed through detailed reviews and analysis of Maritime Electric's planning documents, reviews of planning documents/information from the other major utilities and planning organizations in the Maritimes region, our experience with and understanding of the technical characteristics of the different capacity resources, and our experience preparing detailed cost estimates for various capacity resource technologies.

This report is structured as follows:

- **Resource Planning Considerations** This section of the report highlights the key planning considerations that factor prominently in the analysis of the different capacity resource options considered and ultimately drive the final resource recommendations.
- **Carbon Emissions Planning** This section augments the previous section with a specific focus on how Maritime Electric can most effectively achieve its carbon reduction/sustainability targets. This section discusses some of the challenges associated with portfolio decarbonization, along with potential ways those challenges can be addressed.
- **Capacity Resource Comparison** This section of the report introduces the different capacity resources considered as part of this analysis. For each resource, a summary of the resource's key technical characteristics and applicability to Prince Edward Island (PEI) / Maritime Electric's portfolio are discussed.
- **Capacity Resource Analysis** In this section, both a preliminary and secondary screening of the different resources is performed to narrow the technologies down to those that are best suited to meeting Maritime Electric's most immediate needs/goals.
- **Capacity Resource Recommendations** The final section of this report compares various portfolios that combine the different short-listed technologies, ultimately recommending a final portfolio.

This report is meant not only to provide a recommendation of a portfolio of technologies for Maritime Electric, but also to serve as a guide to the reader on the unique considerations that drive the final resource recommendations. In addition to the main sections of the report, a number of appendices are also included that provide supporting information.

The following subsection provides a brief introduction to S&L.

Capacity Resource Study

1.1. SARGENT & LUNDY INTRODUCTION

S&L is one of the oldest and most experienced full-service architect-engineering firms in the world. Founded in 1891, the firm is a global leader in power and energy with expertise in: all forms of electric power generation; resource planning; power transmission and distribution; grid modernization; energy storage; fuel infrastructure; energy consulting; decarbonization; hydrogen; carbon capture; oil and gas infrastructure; and physical and cyber-security. S&L's power generation experience includes wind, solar, natural gas- and diesel-fired, nuclear power, coal-fired; biomass-fired, oil-fired power plants, among others. We are frequently asked to perform analyses, much like this one for Maritime Electric, to help utilities plan for the future, focusing on the best ways to cost-effectively achieve decarbonization goals, improve system reliability, and maximize value for customers and stakeholders.

From the perspective of generation and energy storage cost and performance estimates, S&L is one of the most recognized firms in the energy industry. Our work frequently consists of either designing or providing project oversight through the development / operation of generation and energy storage projects. S&L maintains detailed cost databases of these projects, which helps inform our cost estimates such that they are based on actual cost data for recent projects that are either being built or are operating. Due to our knowledge of generation and energy storage costs, we helped develop the U.S. Energy Information Administration's (EIA) cost and performance benchmarking database, which consists of 25 different power generation and energy storage technology cases. In addition, we have been performing similar scopes of work for numerous other utilities and for the Electric Power Research Institute (EPRI) for many years.

More information about S&L can be found on our website, at sargentlundy.com.

2 . R E S O U R C E P L A N N I N G C O N S I D E R A T I O N S

This section details the key planning considerations that guide the analysis of the different capacity resource technologies evaluated later in the report. Important background information on the various considerations is provided as necessary.

2.1. MARITIME ELECTRIC'S ENERGY AND CAPACITY OBLIGATIONS

Maritime Electric must not only meet the hourly electricity demand for their customers, but it must also have a sufficient amount of generation capacity (either owned by Maritime Electric or purchased from resources on PEI or on the mainland) to meet regional reliability requirements of the electrical system. The two requirements are discussed further below:

2.1.1. Energy Obligations

Energy obligations are those that are associated with real-time system electrical demand. Maritime Electric's energy obligations vary on a continuous basis throughout the day, based on customer electricity usage. Maritime Electric has historically served this load with energy generated by three different sources:

- 1. A total of 29 MW of continuous baseload energy purchased from the Point Lepreau Nuclear Generating Station (located on the mainland in New Brunswick);
- 2. Energy purchased from wind farms located on PEI. Generation from the wind farms varies hourly based on wind speed;
- 3. Energy purchased from the mainland through an energy purchase agreement (EPA) with New Brunswick Energy Marketing (NBEM). The amount of energy purchased from NBEM varies continuously depending on the system load and real-time electricity generation from PEI's wind farms;

These three resources have historically combined to meet over 99% of Maritime Electric's load (with the remainder supplied by Maritime Electric's on-island backup generation). In addition, these resources are mostly carbon-free. In fact, 86% of the energy that Maritime Electric provides to its customers (as of 2021) is generated with resources that do not emit carbon².

Maritime Electric's system load, both in terms of system peak and energy, has increased virtually every year since 2010. The following table illustrates both historical and forecasted load. For reference, there has been over a 25% load increase (in GWh) between 2010 and 2021.

²Taken from page 23 of the 2022 Maritime Electric Sustainability Report

[^{\(}https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf\)](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf)

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Table 2-1 — Historical and Forecasted Annual Energy and Peak Load

The increasing load correlates with the steady population growth PEI has seen over the most recent decades. In 2011, the PEI Statistics Bureau reported that PEI had just over 140 thousand residents³, which grew to 154 thousand residents by 2021⁴ . This corresponds to a 10% growth in island population between 2011 and 2021. Maritime Electric has also noted a continuous shifting towards electric heating on the island, which is expected to continue moving forward over the near to intermediate term. This shift helps to explain the fact that electricity consumption growth on the island has outpaced population growth on the island over the most recent decade.

Moving forward, we would expect system load to continue to increase due to a combination of continued population growth (which is forecasted to increase steadily moving forward based on estimates by the PEI Statistics Bureau), a continued transition of island residents to electric heating, and some adoption of electric vehicles. There are some considerations that will help to offset system load growth, including increasing demand side resources / policies, energy efficiency improvements, increasing resident-owned generation such as solar panels on homes (which provides energy but does not reduce peak system load), etc. However, based on our review of the current / forecasted impact of the demand side management (DSM) program, we do not expect the DSM program will be able to fully offset the expected increase in load as a result of the island population growth and the continued transition of residents to electric heating.

2.1.2. Capacity Obligations

Capacity obligations are associated with ensuring there is enough generation capacity installed in the region to maintain system resource adequacy⁵. The capacity requirements for the entire Maritimes Area, which includes PEI, New Brunswick, Nova Scotia, and northern Maine, are established by the Northeast Power Coordinating Council (NPCC).

As one of the utilities serving electrical load in the Maritimes Area, Maritime Electric coordinates with the other utilities in the Maritimes Area to ensure the regional capacity requirements established by NPCC are

³ http://www.gov.pe.ca/photos/original/2011Census.pdf

⁴ https://www.princeedwardisland.ca/sites/default/files/publications/2021_census_reports.pdf

⁵ Resource adequacy refers specifically to the provision that the region has a sufficient number of generating resources installed to meet both system load and generating reserve requirements. The amount of generation installed in the region needs to be high enough to cover for the periodic maintenance of generators and the probability that some generators will be out of service due to forced outages (i.e., broken down)

met. Under the terms of its Interconnection Agreement with New Brunswick Power, Maritime Electric is required to be able to carry sufficient generating capacity to meet its firm peak hourly load, plus a 15% planning reserve margin. Additionally, a single capacity resource cannot account for more than 30% of Maritime Electric's capacity contributions.⁶

The following figure illustrates the Maritimes Area.

It is important to note the distinct differences between Maritime Electric's energy and capacity requirements. While related, energy and capacity are also distinctly different. Resources that Maritime Electric uses to meet their regional capacity obligations do not have to be the same resources that they use to meet energy obligations. For example, Maritime Electric's diesel and oil-fired generators typically account for less than 1% of annual energy generation, but they have accounted for over 40% of the capacity Maritime Electric counts toward their regional capacity sharing obligations. If Maritime Electric cannot meet its capacity obligations fully using on-island resources, it must meet them by purchasing capacity from generators elsewhere (i.e., the mainland). In 2021, Maritime Electric purchased approximately 50% of its required capacity from power plants in New Brunswick (this includes purchases from Point Lepreau). The following table compares the resources that Maritime Electric used to meet their energy and capacity obligations in 2021.

⁶ These are contractual requirements per the 1977 interconnection agreement between Maritime Electric and New Brunswick Power that were established to regulate the amount that Maritime Electric / PEI contribute to the overall Maritimes Area regional capacity requirements

⁷ Source: *NPCC 2021 Maritimes Area Interim Review of Resource Adequacy*

Table 2-2 — Comparison of MECL Energy and Capacity Obligations for 2021

Notes/Sources:

1) Due to the retirement of the Charlottetown oil-fired generators, this value falls from 127 MW to 89 MW in 2022, resulting in capacity purchases from New Brunswick increasing from 41% to 54% of the total resources Maritime Electric utilizes to meet capacity obligations.

2) The capacity values of the wind and solar generators account for the appropriate conversion of nameplate capacity to effective capacity (i.e., including the effective load carrying capability of the generator, or ELCC), which is a required conversion Maritime Electric must perform. Further discussion is provided in Section 2.2.1 and Appendix C.

In the table above, it is important to note the small amount of capacity that Maritime Electric is able to count from the PEI wind farms and solar installations towards their regional capacity obligations (21 MW and 0 MW, respectively), especially considering there are 92.5 MW of wind generation contracted with Maritime Electric. The reason for this is because the capacity contributions of these resources is calculated using a methodology that appropriately reduces their capacity value to account for both the resource's intermittency and when the resource generates with respect to when system load is highest. This calculation methodology is an industry requirement that Maritime Electric must follow. This concept/methodology is discussed in additional detail in [Appendix C.](#page-432-0)

2.1.2.1. Meeting Capacity Obligations in the Future

The recent retirement of Maritime Electric's Charlottetown oil-fired generators has resulted in a significant drop in generation capacity located on PEI. As a result, in order for Maritime Electric to meet its regional capacity obligations, it has had to purchase additional capacity from New Brunswick to replace the retired capacity of the Charlottetown generators. [Table 2-3](#page-334-0) provides Maritime Electric's historical and forecasted capacity obligations, in addition to the resources that Maritime Electric has/will use to meet those obligations. It is important to note that the capacity obligations increase each year as a result of increasing island peak hourly load (Maritime Electric's load and peak load forecast is discussed further in Section [2.1.1\)](#page-330-0). For reference, the capacity obligations also account for the forecasted increasing contributions from the DSM program on PEI. As can be observed in the table, the share of Maritime Electric's capacity

obligations that it can meet with on-island generators falls from near 60% (between 2015 and 2019) to just above 35% following the retirement of the Charlottetown generators and the continued increase in system peak load.

Notes:

1) The reductions from 143 MW to 127 MW in 2020 and from 127 MW to 89 MW in 2022 is a result of the retirement of the Charlottetown oil-fired generators.

2) The capacity values of the wind generators account for the appropriate conversion of nameplate capacity to effective capacity (i.e., ELCC), which is a required conversion Maritime Electric must perform. Further discussion is provided in Section 2.2.1 and Appendix C. The effective capacity of the solar generators is 0 MW; thus, they are not included in the above table.

Purchasing higher amounts of capacity from New Brunswick, or other locations, results in increased capacity market price exposure for Maritime Electric. In the event that the price of generation capacity rises, Maritime Electric's customers will be more negatively impacted by the price increase. As discussed in Section [2.4.1,](#page-346-0) the mandated retirement of coal power plants throughout Canada by 2030 will result in less available capacity in the region. With less available capacity in the region (combined with the other factors discussed in Section [2.4\)](#page-346-1), we expect that the market price for capacity will rise in the future.

In addition, less on-island generation capacity translates to a higher risk for Maritime Electric's customers in the event that PEI is electrically disconnected from the mainland. During a disconnection, Maritime Electric can only serve load with the generators installed on-island. In addition, only a portion of the onisland wind generation can be used during a disconnection from the mainland due to the fact that there are not enough other on-island generators available to fully balance the wind generation (without proper balancing of the wind generation, the electrical system can collapse). As a result, any disconnection from the mainland will result in Maritime Electric not having enough generation to fully meet load and it will be forced to shed load (i.e., not fully serve all customer demand) and implement rolling blackouts. The severity

of the rolling blackouts will increase with lower amounts of generation capacity installed on the island. For Maritime Electric, this risk is of significant concern given that the potential consequences of Maritime Electric not being able to serve customer load during a serious weather event are potentially catastrophic. This scenario is discussed in further detail in Section [2.2.](#page-335-0)

2.1.2.2. Potential Capacity Resources

There are many different types of technologies that provide capacity to an electrical system. In general, the technologies best suited to providing capacity to the system are those that are dispatchable, meaning the system operator has complete control over when the technology provides electricity to the system. A further discussion of the different sources of capacity that Maritime Electric could integrate and their effectiveness at helping meet Maritime Electric's regional capacity obligations are summarized below:

- **Demand Response / Demand Side Programs**: Demand response programs (DSM) incentivize customers to shift/reduce electrical usage during critical times. The net result of these programs is that they help the utility better balance supply and demand. Demand response is considered a dispatchable resource and can be counted towards meeting capacity obligations due to the fact that it helps utilities reduce peak demand.
- **Energy Storage**: Energy storage systems are a good source of capacity that Maritime Electric could utilize to meet its obligations. Energy storage systems are considered dispatchable resources. It would need to be formally quantified how much of the energy storage nameplate capacity Maritime Electric would be able to count towards its capacity obligations; however, we expect this value to be near the storage project's nameplate capacity.
- **Dispatchable Generators**: A dispatchable generator is one where the operator has control over when the unit is on/off and at what MW output level the generator is operating at. Some examples of common dispatchable generator technologies include engines and combustion turbines. Dispatchable generators are well suited to help Maritime Electric meet its regional capacity obligations.
- **Non-Dispatchable Generators**: These generators are those where the operator only has partial control over generator operation. For example, the MW output level of the wind farms on PEI are dependent on the wind speed, which can vary over the course of the day. Per industry requirements, Maritime Electric can only count a small portion of a non-dispatchable generator's nameplate capacity towards meeting its regional capacity obligations (e.g., Maritime Electric is only able to count less than 25% of the total wind nameplate capacity – additional information is provided in Section [2.2.1](#page-336-0) and [Appendix C\)](#page-432-0); thus, while non-dispatchable generators are well suited to help Maritime Electric meet its energy obligations, they are not well suited to help Maritime Electric meet its regional capacity obligations.

2.2. DISCONNECTION FROM MAINLAND

An important planning consideration for Maritime Electric is a situation where PEI is electrically disconnected from the mainland. A disconnection from the mainland has the potential to have serious

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consequences for PEI, especially if the outage were to take place during an extreme weather event. Since PEI has seen a significant transition towards electric heating in homes, a disconnection and subsequent loss of power during extreme cold would leave many residents without heat, which could result in significant property damage (i.e., from frozen plumbing) or even loss of life. For reference, the extended power outages during winter 2021 in Texas, resulted in 246 deaths⁸ and nearly \$200 billion dollars (USD) in property damage⁹. While the cause of the devastation in Texas was weather-driven, it was also a consequence of lack of system preparedness for a low probability, but high severity event.

In the event that PEI is electrically disconnected from the mainland in the winter, there is not enough onisland generation installed to meet system load, which would result in Maritime Electric having to implement rolling blackouts. ¹⁰ The reason for this is twofold. First, the total capacity of Maritime Electric's on-island dispatchable generators has recently fallen due to the retirement of the Charlottetown oil-fired generators. Historically, Maritime Electric's dispatchable capacity (127 MW) has been approximately 50% of peak load; however, this number (89 MW) is now only just above 30% of peak load. Second, only a fraction of the island's wind capacity can be utilized in a scenario where PEI is disconnected from the mainland, as is discussed in the following paragraph. [Table 2-7](#page-343-1) in Section [2.2.4](#page-343-0) provides an annual comparison of the amount of dispatchable capacity Maritime Electric has available versus system peak load.

2.2.1. Wind Capacity During Disconnection of PEI from Mainland

Both when PEI is connected to the mainland and in a scenario where it is disconnected, properly managing island load and the variable generation of the wind farms on PEI is critical, due to the fact that an imbalance of electricity supply and demand can result in a system collapse. When connected to the mainland, the load/wind balancing requirements of the PEI electrical system are provided by mainland generators and purchased through the agreement with NBEM. An example illustrating the load/wind balancing support the NBEM energy provides is shown in [Figure 2-2,](#page-337-0) which illustrates a typical winter day for Maritime Electric. As can be seen in the figure, nuclear generation is fixed for each hour of the day, but the wind generation varies based on the wind speed. The NBEM energy purchases vary throughout the day and make up the difference between the system load and the wind plus nuclear energy.

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⁸ https://www.texastribune.org/2022/01/02/texas-winter-storm-final-death-toll-246/amp/

⁹ https://www.austintexas.gov/sites/default/files/files/HSEM/2021-Winter-Storm-Uri-AAR-Findings-Report.pdf

¹⁰ Maritime Electric 2020 Integrated System Plan, page 41 and 42

If PEI were disconnected from the mainland, these balancing requirements would need to be met by onisland generators. To balance the wind generation and system load, the dispatchable generators on PEI would need to vary output on a continuous basis to offset the peaks and valleys of the wind generation and load. Given there is a significant amount of wind capacity installed on PEI relative to the amount of onisland dispatchable capacity, only a fraction of the wind generation could be utilized when PEI is disconnected from the mainland without risking overwhelming the capabilities of the dispatchable generators on the island, leading to an electricity supply/demand imbalance and subsequent potential PEI electrical system collapse.

The following figure provides an example illustration of system dispatch in the event of a disconnection from the mainland. It is important to note that the balance between the amount of load that can be served and the amount of load that must be shed is critical during this event. To maintain this balance, Maritime Electric has to not only properly balance out the generation from the wind, but also intentionally cut power to customers on a rolling basis to not overwhelm the on-island generator's capabilities (see Section [2.2.2](#page-340-0) for additional details on rolling blackouts).

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It is also important to note that during very high wind speeds (for example, during a major storm), the wind turbines must be stopped to avoid damage. In this event, much more load shed can be expected.

Maritime Electric estimates that a maximum of roughly 37% (71 MW) of all the total installed island wind nameplate capacity on PEI¹¹ could be dispatched if PEI were disconnected from the mainland without risking overwhelming the balancing capabilities of the dispatchable generators. Actual wind dispatch would depend on wind conditions, wind farm ability to respond to system operator directives, and contractual arrangements. In the event that the Charlottetown CT3 was also lost, the island would have an extreme shortfall in dispatchable generation that could be used for energy balancing; thus, an estimated 0% of the on-island wind generation could be utilized without risking system collapse. To illustrate this important concept, the following table was developed based on input from Maritime Electric. In the table, three different scenarios are illustrated:

- **Scenario A**: Wind generation on PEI is available and generating electricity continuously. In this scenario, the amount of wind shown in the table is the estimated maximum amount that the onisland dispatchable generators can handle without jeopardizing system stability.
- **Scenario B:** This scenario assumes that the Charlottetown CT3 is in outage. This scenario is shown to illustrate the importance of the wind balancing contributions of the on-island dispatchable resources. The loss of CT3 during an event where PEI is disconnected from the mainland would result in a significant reduction in the amount of dispatchable capacity that could be used to balance

¹¹ This is based on energy from all wind generation located on-island, which includes facilities supplying both on- and off-island customers.

the intermittent generation from the wind. As a result, Maritime Electric estimates that no wind generation could be utilized without risking the destabilization and potential failure of the electrical system. Load shed is expected to be much higher than Scenario A in this scenario.

• **Scenario C**: In this scenario, the wind generation is not available, due to the wind not blowing, wind speeds that are too high for operation of the wind turbines, transmission failure, or other similar reason. Load shed is expected to be much higher than Scenario A in this scenario.

The amount of load that the system can meet in all three scenarios is much lower than the peak winter load (approximately 280 MW), indicating that rolling blackouts will likely occur if PEI is disconnected from the mainland. It is important to note that the dispatchable capacity in the summer would be lower than what is shown in the table due to temperature deratings of the dispatchable generators (the estimated total capacity available in Scenario A would reduce from 160 MW to approximately 140 MW).

Table 2-4 — Capacity Available to Serve Load When PEI is Disconnected

Notes:

1) The values in the above table are an estimation based on our review of the system and our discussions with Maritime Electric. Further detailed study is required to more accurately determine the amount of electricity that can be supplied, both in the current system and in the system after this report's recommendations are incorporated.

The following figure is included to illustrate how the above generation levels compare to historical system electrical demand (load) in the winter months (January through March and October through December). The figure presents the distribution of hourly electrical load based on historical data from the years 2018 through 2021. As an example, the figure illustrates that system load was approximately 190 MW for just under 12% of the hours in winter months between 2018 through 2021. During this time period, the average system load was 173 MW. Overlaid on the figure are the three different generation levels from Scenario A, B, and C in the table above. The figure illustrates the historic system electrical load far exceeded the amount of megawatts that could have been served in Scenarios A, B, and C during a disconnection of PEI from the mainland. Even the generation level of Scenario A, which is the highest of the three scenarios, generally falls short of historical hourly electrical demand.

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Figure 2-4 — Historical System Winter Load Histogram (2018-2021)

Comparison to the Amount of Load MECL Could Serve During a Disconnection of PEI from the Mainland

2.2.2. Rolling Blackouts

In the event that PEI is electrically disconnected from the mainland, Maritime Electric would likely be forced to implement rolling blackouts due to the fact that there will not be enough generation to meet the full electrical system load. In a rolling blackout, different parts of the electrical grid are energized on a rotating basis, while others are without power. A rolling blackout reduces total system load such that served electrical demand does not exceed supply (a mismatch could lead to system collapse). In addition, the burden of the generation shortfall is shared such that no one area of the grid is without power for more than a set length of time.

The following table illustrates an example of how a rotating blackout might work. In this example, total system generation is assumed to equal 75 MW for each hour. The example also assumes that Areas A, B, C, and D make up an electrical system, with each area having a load of 25 MW. Since the total combined load of Areas A, B, C, and D is equal to 100 MW (4 x 25 MW), but generation is only equal to 75 MW, only three areas can be served at one time. The area without electricity is rotated each hour.

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Table 2-5 — Example Rotating Blackout Schedule

It is important to note that rolling blackouts become more severe if there is less generation available to dispatch. During a rolling blackout, this would translate to longer time periods where areas of the grid would have to go without power, which is a significant risk to customer safety. With the recent retirement of the Charlottetown oil-fired generators, Maritime Electric has less on-island dispatchable generation that it can dispatch during a rolling blackout. In addition, several of the island's dispatchable generators are approaching end of life and will have to be considered for retirement in the near future; for example, Maritime Electric's two Borden combustion turbines are 50 years old and some of the Summerside reciprocating engines are over 60 years old.

2.2.3. Historical Frequency of Mainland Disconnections

There have been a number of times in recent history where PEI was either completely disconnected from the mainland, or some portion of the electrical connection to the mainland was lost, resulting in emergency generation and load shed (emergency blackouts) to prevent total system failure.

- Complete disconnection from mainland: 4 events since 2004, of varying duration. The most recent event took place on November 29, 2018 and lasted approximately 8 hours.
- Partial disconnection from mainland, resulting in emergency generation / load shed: 5 events dating back to 2008. The most recent was on January 22, 2018.

More broadly, between 2019 and 2021, the on-island combustion turbines operated on 130 occasions, of which 42 of those occasions prevented either interruptible load having to be shed or wider system rolling blackouts. All remaining operation of the on-island combustion turbines were either to provide emergency energy to Nova Scotia Power / New Brunswick Power, perform required monthly test runs of the combustion turbines, or various transmission-related reasons. A breakdown of the reasons the combustion turbines were operated between 2019 and 2021 is provided in the following table.

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Table 2-6 — Historical Reasons for Combustion Turbine Operation, 2019 – 2021

Of the 130 occasions the combustion turbines had to operate, a common reason is due to "hold to schedule" events, which are discussed further below.

2.2.3.1. Hold to Schedule Events

There have been numerous events where on-island backup generation was operated to prevent interruptible load from being shed, or even rolling blackouts. Many of these events are categorized as "hold to schedule" events and occur when Maritime Electric is unable to import the full amount of electricity from the mainland needed to completely meet system load.

The most common reason for a "hold to schedule" event is when there is a sudden shortfall in island wind generation compared to what the wind generation was forecasted to be. Maritime Electric must tell NBEM how much electricity it plans to import from the mainland ahead of time. In order to determine the amount of electricity it needs to purchase and import, Maritime Electric must first use a forecast of island wind generation to determine how much electricity the PEI wind generators should be able to contribute over the course of the day to meeting system load. After accounting for the forecasted wind generation, Maritime Electric then forecasts how much electricity it needs to purchase from New Brunswick to serve any remaining load that will not be able to be fully met by the expected wind generation. Once Maritime Electric tells New Brunswick Power how much electricity it plans to purchase and import, any remaining unpurchased electricity available at the intertie between PEI and New Brunswick is often purchased by Nova Scotia Power. In the event the wind generation on PEI falls short of its forecast, Maritime Electric will be short on electricity to fully meet load and has to request additional electricity in real time from New Brunswick to make up for the shortfall. If there still is transmission capacity available, Maritime Electric can purchase and import the associated electricity to meet system load; however, if the electricity has already been previously purchased by Nova Scotia Power, or is unavailable for some other reason, Maritime Electric is required to "hold to [its original] schedule", and as a result must start its backup generators to make up for the shortfall in wind generation and meet system load.

Hold to schedule events are typically short in duration (i.e., an hour), but occur with relative frequency, primarily due to the difficulty of forecasting wind generation with complete accuracy all of the time.

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2.2.4. Recommended Generation Capacity During Rolling Blackouts

While any instance that rolling blackouts occur is a serious emergency event, the severity of rolling blackouts can vary based on how much on-island generation capacity is available to be dispatched. Historically (through the mid- to late-2010's), Maritime Electric has had an amount of on-island dispatchable generation capacity (between its oil-fired and diesel-fired generators) equal to at least 50% of winter peak load (winter is the season where load is highest on PEI). Maritime Electric has been able to successfully navigate previous potential rolling blackout scenarios with this amount of dispatchable capacity; however, we note that Maritime Electric and PEI have also been fortunate in that the previous instances PEI has been disconnected from the mainland have been resolved within hours. Future events (i.e., large storms, hurricanes, etc.) that might damage key interconnection equipment could result in PEI being disconnected from the mainland for much longer periods of time.

With the recent retirement of the Charlottetown oil-fired generators, Maritime Electric has significantly less dispatchable generation capacity located on PEI that it can utilize to meet system load in the event that PEI is disconnected from the mainland. The retirement of the oil-fired generators has resulted in the amount of on-island dispatchable capacity falling from over 50% to approximately 30% of winter peak load (which includes the peak load reductions provided by DSM). This is shown in the following table.

	Year (2023 – 2032 are Forecasted Years)													
	Average 2015-2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
MECL Peak Load (MW) (Net of DSM)	239	257	276	280	284	289	293	299	305	311	317	323	329	335
Charlottetown Thermal Plant (MW)	54	38	38	0	0	Ω	Ω	Ω	Ω	0	0	Ω	0	$\mathbf 0$
Borden Generating Station (MW)	40	40	40	40	40	40	40	40	40	40	40	Ω	0	0
Charlottetown CT3 (MW)	49	49	49	49	49	49	49	49	49	49	49	49	49	49
Total (MW)	143	127	127	89	89	89	89	89	89	89	89	49	49	49
Ratio of Dispatchable														

Table 2-7 — Outlook of Dispatchable On-Island Capacity vs. Peak Load

As compared to the mid- to late-2010's, the current low amount of dispatchable on-island capacity (per peak load level) poses a significant risk to Maritime Electric's customers in the event of a disconnection from the mainland, as it will likely lead to more severe rolling blackouts than would have occurred in the past. There is not a consistent energy industry standard that identifies exactly what rolling blackout severity level is acceptable versus unacceptable; thus, it is difficult to identify the exact amount of dispatchable

60% 49% 46% 32% 31% 31% 30% 30% 29% 29% 28% 15% 15% 15%

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On-Island Capacity to Peak Load (%)

capacity Maritime Electric should have installed on PEI to manage the unique situations where PEI is electrically disconnected from the mainland. As such, our recommendation for how much dispatchable capacity Maritime Electric should have installed on PEI is based on the consideration that Maritime Electric was successfully able to navigate previous potential rolling blackout scenarios. During those previous scenarios, there was an amount of dispatchable capacity on PEI greater than or equal to (≥) 50% of peak load.

Accounting for the anticipated continued load growth on PEI, and also considering the continued growth of DSM on the island, approximately 85 MW of additional dispatchable capacity is required to bring the current ratio of dispatchable capacity to peak load back in line with the 50% historical threshold. Note that even with this amount of additional dispatchable capacity, there would likely still be a need for rolling blackouts to be implemented if PEI were disconnected from the mainland. The following figure illustrates the ratio of dispatchable on-island generation capacity versus peak load both historically and forecasted through 2032. A second set of data points are included on the figure to illustrate how the ratio of dispatchable capacity versus peak load increases if 85 MW of additional dispatchable capacity are added on PEI in 2025. Note that current estimates for the retirement of the Borden Generating Station (40 MW) is approximately 2030. Additional capacity, beyond the 85 MW assumed in 2025, would have to be added to the system in 2030 to replace Borden's retired 40 MW capacity to maintain a 50% ratio of capacity to peak load. The following figure does not add any additional capacity to replace Borden; however, it does illustrate the impact of Borden's retirement in terms of the capacity to peak load ratio.

Figure 2-5 — Outlook of Dispatchable On-Island Capacity vs. Peak Load

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2.2.5. Battery Energy Storage During System Disconnection

Given the interest in and growth of BESS in electrical systems over the last decade, we have provided the following subsection to explain some of the capabilities and shortcomings of BESS in a situation where PEI were electrically disconnected from the mainland.

A key challenge if PEI's system is disconnected from the mainland grid is that there will likely not be enough generation to meet all system load. As a resource, BESS cannot generate energy, it can only transfer energy from one period of time to another; however, BESS can provide some portion of the system balancing needs (i.e., absorb excess wind generation or inject energy when wind generation is low). By meeting some portion of the island's balancing needs, BESS could allow PEI to utilize a larger amount of the on-island wind generating capacity in the event of an electrical disconnection to the mainland. For example, if wind generation was high one moment, the BESS could absorb some of the excess wind generation, which would allow the dispatchable generators on the island to operate at a more continuous MW level. Without the BESS, those dispatchable generators would otherwise have to lower output to make room for the high wind generation.

It is important to note that the ability for BESS to help meet the island's balancing needs is limited by the BESS state of charge at that point in time. The limitations would be that during low wind production periods, the battery would have to be sufficiently charged to be able to inject the necessary balancing energy, while in contrast, during high wind production periods, the BESS would need sufficient headroom to be able to absorb the excess wind energy. If the BESS were empty / fully charged when wind production was low / high (respectively), the BESS could not help balance the system at that moment. Since the BESS state of charge during a disconnection from the mainland is a function of 1) its state of charge when the mainland disconnection occurred 2) the output of the wind generators during the disconnection, and 3) the length of time it takes for PEI to be re-connected to the mainland, it is difficult to accurately forecast how much system balancing benefit BESS could provide PEI during a disconnection from the mainland.

For planning purposes, a worst-case scenario for PEI during a situation where the island was disconnected from the mainland would be a scenario where there was no wind generation, due to the wind not blowing, the wind blowing too strongly to operate the wind turbines, a transmission failure, or some other similar reason. In this scenario, the benefit of a BESS would be limited to the amount of energy it has stored (i.e., its state of charge) when the island was disconnected from the mainland, the BESS MW capacity, and the BESS duration (i.e., 2-hour, 4-hour, etc.). If this disconnection lasted for a significant period of time (e.g., as long as or longer than the 8-hour disconnection PEI experienced in 2018), the BESS would not be able to help the system for the full duration of the time PEI was disconnected from the mainland. In this situation, the BESS' energy reserves would be drained and there would be no way to recharge the BESS until a mainland connection was restored.

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2.3. RENEWABLE AND SUSTAINABILITY TARGETS

Sustainability and reducing carbon emissions are two of Maritime Electric's most important goals. At present, 86% of the electricity that Maritime Electric delivers to its customers is generated using carbonfree resources. In 2021, Maritime Electric received the Sustainable Electricity Leader designation from Electricity Canada. Moving forward, Maritime Electric has established a greenhouse gas emissions reduction target to reduce emissions by 55% by 2030 (from 2019 levels). A detailed discussion regarding our recommended methods for how Maritime Electric can achieve this emissions reduction target is provided in Section [3.3.](#page-364-0) In addition, Section [3](#page-353-0) provides a general overview of carbon emissions planning considerations related to Maritime Electric's portfolio.

2.4. REGIONAL GENERATION PLANNING CONSIDERATIONS

Given that PEI purchases a significant amount of both energy (over 75%) and generation capacity (over 60%) from its neighbours, it is important to consider the generation plans of PEI's neighbours when assessing what types of / how many resource additions PEI will require moving forward. As such, S&L reviewed planning documents from New Brunswick Power, Nova Scotia Power, and Hydro Québec.

2.4.1. Coal Power Plant Retirements

The government of Canada has committed to phasing out conventional coal-fired power plants by 2030. This commitment will have a significant impact on the generation portfolios of both New Brunswick and Nova Scotia. At present, coal generation accounts for the following amounts of capacity in these provinces:

- New Brunswick: 467 MW, or 12.3% of the province's total generating capacity
- Nova Scotia: 1,234 MW, or 41.2% of the provinces total generating capacity

Both the New Brunswick Power and Nova Scotia Power Integrated Resource Plans (IRPs) postulate scenarios where their coal generation is retired in 2030. In both IRPs, the scenarios that retire coal in 2030 require substantial modifications to each utility's overall generation portfolio.

• *New Brunswick Power:* At the time the 2020 New Brunswick IRP was written, New Brunswick Power considered the continued operation of the 467 MW Belledune Coal Power plant until 2040 via an equivalency agreement with the government to be the most cost-effective and likely plan for the future. Since the publication of the IRP, the government has mandated that the coal power plant must retire by 2030. The IRP did explicitly consider a scenario where coal is retired by 2030 and noted that electricity imports and renewable energy / storage are not feasible solutions to replacing the retired coal capacity from Belledune. Instead, the IRP postulated potentially building a new natural gas power plant or small modular nuclear reactors to replace the coal capacity. At present, it is uncertain how New Brunswick will replace the retired coal capacity.

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- *Nova Scotia Power:* Given coal generation makes up a significant percentage of Nova Scotia Power's total generation capacity (41.2%), the retirement of coal generation in Nova Scotia by 2030 necessitates substantial changes to Nova Scotia's generation portfolio. The Nova Scotia IRP considers that the retired coal generation will be replaced with a combination of new natural gas power plants, wind and solar farms, demand response, imported capacity, and energy storage. From an energy perspective, the Nova Scotia IRP estimates that wind generation and imported energy will be primarily how generation from coal is replaced in the future. Additionally, given Nova Scotia will have an increased reliance on imported capacity and energy following the retirement of coal generation in 2030, the top item noted in the IRP's action plan is the development of a regional integration / interconnection strategy to better connect Nova Scotia electrically to the rest of the Canadian provinces and the North American mainland.
- *Hydro Québec:* The impact on Hydro Québec due to the retirement of coal generation in Canada by 2030 will be primarily demand-based. Hydro Québec operates a sizable fleet of hydroelectric power plants, with a total hydroelectric capacity of 36,700 MW. The retirement of coal generation in the region is likely to result in an increased demand for capacity and energy from Hydro Québec's power plants. In addition, the United States has been an important consumer of Hydro Québec's hydroelectric generation. Sales of electricity from Hydro Québec to the United States averaged approximately 25 TWh in 2021, which is 30% higher than a decade ago¹². As the United States works towards meeting its own decarbonization goals, demand from the United States for Hydro Québec's generation is likely to increase. In fact, Hydro Québec recently signed major long-term power purchase agreements with both Massachusetts and New York, each for approximately 10 TWh annually¹³. Finally, Québec's own electricity demand is expected to grow substantially over the next decade. Hydro Québec estimates that their system load will grow by 20 TWh between 2019 and 2029 (a 12% regional load increase). To meet these challenges, Hydro Québec is implementing a robust energy efficiency policy and also has a long-term plan to install another 5,000 MW of renewable generating capacity, consisting primarily of both hydroelectric (2,000 MW installed by 2035) and wind generation (3,000 MW installed by 2026).

From the perspective of PEI, the retirement of coal in Canada by 2030 will result in significant changes to the generation portfolios of PEI's immediate neighbours. While PEI's neighbours are planning on developing new capacity, the level of investment and mobilization needed to replace the retired coal capacity is significant considering that the retirement deadline for the coal power plants is less than a decade away. In addition, there is a forecasted increase in energy and capacity demand from Nova Scotia

¹²https://www.cer-rec.gc.ca/en/data-analysis/energy-commodities/electricity/statistics/electricity-tradesummary/index.html

¹³ https://www.hydroquebec.com/data/documents-donnees/pdf/strategic-plan.pdf?v=2022-03-24

and the northeastern United States. All of this is likely to result in more competition for regional energy and capacity if the development of new generating resources and the implementation of regional energy efficiency programs cannot keep pace with demand growth. An increase in demand without similar corresponding increase in supply has the potential to result in higher costs for Maritime Electric's customers.

2.4.2. Mactaquac Generating Station Life Extension Project

Given that Maritime Electric imports a substantial amount of both system capacity and energy from New Brunswick, S&L reviewed the New Brunswick Power Corporation's 2020 IRP to determine whether any planned changes occurring in New Brunswick with respect to generation might impact Maritime Electric's ability to import electricity and capacity into PEI. One important consideration is the Mactaquac Generating Station life extension project.

The Mactaquac Generating Station is a 668 MW hydroelectric power plant that provides a significant amount of renewable generation to New Brunswick and the surrounding areas, including PEI. This power plant is one of the most important in the region due to both its large size and dispatchability, in addition to the fact that it is a zero-carbon emitting generator. For reference, the Mactaquac Generating Station accounts for just under 18% of New Brunswick Power Corporation's 3,790 MW generating capacity.

Related to the Mactaquac Generating Station, The New Brunswick Power Corporation notes that "since the 1980s, concrete portions of the station have been affected by a chemical reaction called an alkali-aggregate reaction. This reaction causes concrete to swell and crack. This results in significant annual maintenance and repairs. Without additional capital improvements, the station is expected to reach the end of its service life in 2030." As a result, the New Brunswick Power Corporation has recommended a life extension project for the power plant to make necessary repairs and improvements, ultimately allowing the power plant's life to extend to 2068. As of the writing of the New Brunswick Power Corporation's 2020 IRP, this project is expected to start in 2027 and end in 2033. During the project, the output of the power plant will be limited. The life extension project would be a significant capital expense and would require substantial engineering expertise. Estimates for project costs are varied but appear to be in the CAD \$3 billion range or higher.

Given the scale of this project and the importance of the power plant to the region, S&L is of the opinion that there is some uncertainty regarding whether New Brunswick will be able to or willing to sell Maritime Electric enough generator capacity and energy to fully meet Maritime Electric's obligations. The timely progress and success of the life extension project is important for PEI given how reliant PEI is on capacity and energy from New Brunswick. In the event that the Mactaquac Generating Station life extension project experiences schedule delays or there are deratings beyond what is planned, New Brunswick will have less capacity and energy available to sell to neighbours; thus, it would be more difficult for Maritime Electric to secure sufficient capacity and energy at a reasonable price from New Brunswick.

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2.4.3. Regional Transmission Improvements

From an electrical perspective, the increased demand for zero-carbon electricity in the region, including the northeastern United States, will require significant regional transmission upgrades to transport the electricity longer distances. One such proposed large scale project is the Atlantic Loop Project, which would create a transmission loop through eastern Canada so that zero carbon energy could be transported to the Maritime Provinces from Quebec and Labrador. A diagram of the proposed project is included below.

Given the size of the project, different levels of Canadian governments involved, and sizable investment required, a final decision on whether the project will be fully implemented has not been made. As a result, there is uncertainty surrounding whether the transmission system will be able to accommodate the increased clean energy imports and exports between Canadian provinces (and between Canada and the United States) in the future. For PEI, this results in another layer of uncertainty surrounding the potential challenge of securing sufficient energy and capacity from the mainland in the future. This challenge is compounded from the fact that there will likely be an increase in demand for imported capacity and energy as coal is retired in Canada by 2030.

¹⁴ Clean power Roadmap for Atlantic Canada,

https://www.nrcan.gc.ca/sites/nrcan/files/energy/images/publications/2022/A%20CLEAN%20POWER%20ROADMAP %20FOR%20ATLANTIC%20CANADA-ACC.pdf

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2.5. ENERGY CONTRACTS

Currently, Maritime Electric purchases over 60% of the energy it needs to serve system load through a contract (energy purchase agreement, or EPA) with NBEM. The EPA with NBEM is a comprehensive and complex agreement, but in general is based around the framework that the energy Maritime Electric purchases from NBEM follows a fixed rate structure. This agreement offers Maritime Electric a number of important benefits.

The contract provides some level of price volatility insulation for Maritime Electric's customers, especially when compared to an alternative where Maritime Electric instead purchased energy that varies in price on an hourly basis, as is the case in an energy marketplace. A large amount of generation supplied to Maritime Electric from NBEM is generated by New Brunswick Power, which has both a diverse generation portfolio and has a current surplus of generation capacity. As such, New Brunswick Power is able to provide their customers some level of price hedging against market forces that would otherwise increase the cost of power generation. Through the EPA with NBEM, Maritime Electric is also able to partially benefit from New Brunswick Power's generation portfolio's ability to hedge against market forces.

If Maritime Electric were instead part of an energy marketplace like nearby ISO-New England, Maritime Electric's customers would be directly exposed to power prices that vary on a real-time basis. At times, this may be beneficial for customers due to low power prices; however, at other times power prices could be very high. A utility like New Brunswick Power, which has excess generation capacity, is able to reduce/avoid purchases from a marketplace when prices are high because New Brunswick Power instead could dispatch their own power plants to generate electricity at less cost than purchasing it from the highpriced marketplace. However, Maritime Electric has a shortage of generation capacity installed on-island relative to its peak load. As a result, Maritime Electric would still be forced to buy significant amounts of energy from a marketplace during high-priced periods even if Maritime Electric dispatched their own generators during these times.

The following figure illustrates a recent period of energy price volatility in ISO-New England. [Figure 2-7](#page-351-0) shows hourly locational marginal prices (LMPs) for electricity (in USD \$/MWh), for both day-ahead prices and real-time prices, between the end of December 2021 through the beginning of January 2022. Prices are taken from the node that represents the tie between ISO-New England and New Brunswick. As can be seen in the figure, prices both increased and became much more volatile in the beginning of January 2022 due to a combination of cold weather, high electrical demand, and the high price of natural gas (both gaseous and liquified). While infrequent, prices in energy marketplaces can reach levels much higher than those shown in the graph. For example, during the polar vortex event in Texas in 2021 prices touched USD \$9,000/MWh, which was equal to the price cap set by ERCOT, the Texas grid operator.

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While the existing EPA with NBEM does not fully insulate Maritime Electric from macro-market forces that impact the cost of electricity production, it does provide significantly more price certainty than if Maritime Electric met its energy obligations through a marketplace, which is reflected in Maritime Electric's rates.

2.5.1. Energy Storage Arbitrage

Electricity price arbitrage is a use-case for BESS that has seen significant growth in popularity. Energy arbitrage is an economic use-case for BESS that is accomplished by buying energy from a marketplace when energy costs are low and storing the energy until energy costs are high. Once prices are high, the energy is re-injected (sold) into the electricity system. The difference between the purchase price and injection price is profit for the utility, net the efficiency losses of the storage system.

The potential for installing a BESS on PEI and utilizing it for arbitrage is discussed in detail in the recently released report, *Prince Edward Island Resource Planning and Maritime Electric Capital Expenditures, Alternatives to MECL Integrated System Plans and Impact on MECL Capital Expenditures*, developed by Synapse Energy Economics. A requirement in order to engage in an energy arbitrage trading strategy is participation in an energy marketplace (e.g., ISO-New England). At present, Maritime Electric does not currently trade energy in an energy marketplace. Maritime Electric could decide to join an energy

¹⁵ Source: ISO-New England LMP pricing information, https://www.iso-ne.com/isoexpress/web/reports/pricing/- /tree/lmp-by-node

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marketplace in the future; however, this would amount to a change in Maritime Electric's corporate strategy and would require additional investigation to weigh the various pros/cons and coordinate with Maritime Electric's stakeholders/oversight entities. Given that Maritime Electric has a shortage of on-island generation capacity relative to its peak load (described further in the previous section), it is not recommended that Maritime Electric join an energy marketplace in lieu of an agreement with NBEM or similar organization (i.e., exclusively purchase energy through a marketplace instead of through a contract with an entity like NBEM) as this would force Maritime Electric's to meet a significant portion of its energy needs via a marketplace, exposing its customers to much higher energy price volatility.

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3 . C A R B O N E M I S S I O N S P L A N N I N G

This section provides an overview of PEI's electrical system from a carbon emissions perspective, comparisons of PEI to its neighbours, and a discussion of how PEI might reduce carbon emissions moving forward. The goal of this section is to provide the reader a firm understanding of both where Maritime Electric's electrical system is today with respect to carbon production and the most effective changes/policies Maritime Electric/PEI can implement to reduce carbon production in the future.

3.1. MARITIME ELECTRIC SYSTEM OPERATION

As discussed in Section [2.1,](#page-330-1) Maritime Electric has historically met the energy needs of its customers on PEI with energy purchased from the Point Lepreau Nuclear Generating Station, energy purchased from the wind farms located on PEI, and energy purchased from the agreement with NBEM. Between 2019 and 2021, these three resources combined to provide over 99% of the energy Maritime Electric utilized to meet system load. Solar energy and energy generated by Maritime Electric's diesel generators provided the remaining generation. It is important to note that the energy purchased through NBEM has historically helped Maritime Electric not only meet load, but also provide critical load- and renewable- balancing support, and frequency / voltage support needed for system electrical stability. The ability for Maritime Electric to purchase the exact amount of energy it needs in real time from NBEM allows Maritime Electric to balance the variable generation from PEI's wind farms. This in turn has allowed PEI to integrate an increasing amount of wind generation on the island.

3.1.1. Load and Renewable Balancing Resources

As more wind and solar energy is installed on PEI, resources that provide load- and renewable-balancing support will become more important for Maritime Electric because higher amounts of installed wind and solar capacity will result in an increase in the magnitude of generation from the wind and solar farms. For example, currently a total of 92.5 MW of wind capacity is contracted with Maritime Electric. A very windy hour could result in 92.5 MW of generation from the wind farms. If the wind then calmed, a large portion of that wind generation will disappear. By contrast, if another 70 MW of wind capacity was contracted with Maritime Electric, a windy hour could result in 162.5 MW of wind generation. If the wind calmed in this scenario, the drop in total wind generation would be greater than in the current system with only 92.5 MW of wind generation. As a result, more balancing resources will be needed to manage these larger swings in generation.

There are many different types of resources that can provide load- and renewable-balancing support for Maritime Electric. Currently, purchases from NBEM are the primary resource that provide this support. Other options that can provide this support in electrical systems are fast-ramping engines / combustion

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turbines and BESS. At present, Maritime Electric's diesel generators are capable of providing load- and renewable-balancing support to the system, but Maritime Electric rarely utilizes these generators for that purpose due to the fact that they are more expensive to dispatch and produce more carbon emissions (on a per kWh basis) than purchasing energy from NBEM. New engines / combustion turbines could utilize renewable fuels (i.e., biodiesel), which would be an improvement from a carbon emissions perspective; however, purchases from NBEM would still likely be a more cost-effective option than utilizing new engines/combustion turbines.

BESS is also a resource than can be utilized to provide load- and renewable-balancing support to electrical systems. The challenge with utilizing BESS to serve this need on PEI is that there are efficiency losses when charging/discharging a BESS resource, typically on the order of 10% to 15% for lithium-ion batteries. These efficiency losses are significantly higher than the 1.7% transmission losses associated with importing energy from the mainland. The only times a BESS resource could charge in a way that would benefit the system from a carbon emissions perspective would be during hours when the total wind plus nuclear generation exceeds system load. During those hours, the excess generation that would otherwise have to be sold back to the mainland could be stored in the BESS and used at a later time.

To illustrate system operation with and without a BESS, during times when high wind output would result in excess total generation (total generation greater than system load), the following example shown in [Table](#page-355-0) [3-1](#page-355-0) was developed. In the example, two scenarios are presented – one without a BESS resource and one with a BESS resource. In both scenarios, two consecutive hours are illustrated. Wind generation for both scenarios is high during hour 1 (190 MW), then falls for hour 2 (100 MW). Nuclear generation from Point Lepreau is consistent at 29 MW for both hours. In both scenarios, during hour 1 there is excess generation equal to 19 MW due to high wind farm output (system load is only 200 MW for hour 1, while total generation is 219 MW). In the scenario without the BESS, the excess 19 MW has to be sold back to the mainland, but in the scenario with the BESS, the excess 19 MW is used to charge the BESS for re-injection back into the system in the second hour. During the second hour, the battery can only inject 16.2 MW of energy back into the system because the battery is only 85% efficient (19 MW \times 85% = 16.2 MW).

As can be observed in the example, the scenario with the BESS resource is able to increase the total amount of carbon free MWh utilized by PEI from 329 MWh to 345.2 MWh, while reducing the amount of MWh that have to be purchased from NBEM from 71 MWh to 54.9 MWh. By reducing the amount of MWh purchased from NBEM, the battery is able to help Maritime Electric reduce its carbon emissions.

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Table 3-1 — Example A: Comparison of Battery Operation

Battery only charges when there is excess wind + nuclear generation

Currently, total wind plus nuclear generation on PEI very rarely exceeds system load; thus, the BESS would rarely be able to charge as is shown in the above example. The number of times when wind generation plus nuclear generation exceeds system load will increase as more wind generation is installed on PEI. In an effort to quantify how effective BESS would be able to help contribute to systemwide carbon emissions reductions, an hourly calculation of system generation and emissions with and without BESS was developed for various amounts of wind generation. The calculation methodology and results are presented in Section [3.2.1](#page-359-0) and generally finds that the benefit (in terms of both carbon emissions reductions and carbon emissions reductions per dollar invested) a BESS resource could provide is modest.

If instead the BESS resource was allowed to charge from the wind generation during hours where the wind plus nuclear generation was less than system load (as it is for most hours in the current system), the roundtrip efficiency losses of the BESS would result in less overall wind generation being utilized on the island than if the BESS was not used at all. This in turn would require more purchases from NBEM, and higher carbon emissions for the island.

To better illustrate this, the previous example was recreated assuming the wind generation equals 100 MW for both hours 1 and 2. In the example, system operation for the scenario without a BESS resource is identical for both hours due to the fact that both the wind generation and nuclear generation are consistent. In the scenario with the BESS, the BESS charges 19 MW during hour 1, then discharges 16.2 MW during hour 2 – consistent with the previous example. As can be seen in the example that follows, when the BESS resource charges during times when there is not excess generation (e.g., when wind plus nuclear

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generation is less than system load), total purchases from NBEM increase from 142 MWh to 154.9 MW, indicating that it is actually worse for Maritime Electric from a carbon emissions perspective than if the BESS did not operate / if there was no BESS installed. The reason for this is that the round-trip efficiency losses of the BESS result in some carbon-free generation being lost when the BESS charges/discharges.

Table 3-2 — Example B: Comparison of Battery Operation

Battery charges when there is not excess wind + nuclear generation

3.2. CARBON EMISSIONS FOR MARITIME ELECTRIC

Of the three main resources that Maritime Electric has historically utilized to meet system load, energy purchased from both Point Lepreau and the wind farms on PEI do not generate carbon emissions. Energy purchased through NBEM is generated from a variety of different types of power plants located throughout New Brunswick, Nova Scotia, Québec, and the United States. As a result, a portion of the energy purchased through NBEM is generated from power plants that release carbon emissions.

For reference, historical generation in GWh and carbon emissions in tonnes CO2e for Maritime Electric between 2019 and 2021 is provided in [Table](#page-357-0) 3-3.

Table 3-3 — Maritime Electric Historical Generation and Emissions by Source

Notes/Sources:

1) Historical generation data provided by Maritime Electric.

2) Carbon emissions rates for Maritime Electric are taken from the 2022 Maritime Electric Sustainability Report

[\(https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf\)](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf).

3) The average historical net generation of Maritime Electric's generators is -0.5 GWh, due to the fact that these units are primarily on standby (and to be kept on standby the generators must draw a small amount of electricity from the grid). In addition, between 2019 and 2021 the Charlottetown oil-fired generators used an average of 3.3 GWh per year while being retired from service. Shown in the above table is the generation of the diesel generators, not including the electricity they used from the system. The total system generation would average 1,403.5 GWh if both the net generation from the diesel generators and the electricity used from the Charlottetown oil-fired generators was considered.

It should be noted that a significant portion of the energy purchased from NBEM is from non-carbon emitting sources. In fact, 86% of the electricity Maritime Electric delivered to its customers (as of 2021) was generated using non-carbon emitting sources¹⁶.

For comparison, [Table 3-4](#page-358-0) is included to illustrate carbon emissions rates for a variety of different northeast Canadian utilities and other planning regions. From a carbon emissions perspective, Hydro Québec and Newfoundland and Labrador Hydro are the regional leaders in terms of low carbon emission energy production. The vast majority of the electricity these utilities deliver to their customers is generated with inprovince hydroelectric power plants, which do not generate carbon emissions. New Brunswick Power has a diverse portfolio of many different types of generators, including those that generate carbon emissions (e.g., the Belledune and Coleson Cove generating stations) and those that are carbon free (e.g., Mactaquac hydro and the Point Lepreau nuclear power plant), while Nova Scotia Power has a number of operating coal-fired power plants, which tend to generate carbon emissions at a higher rate than other power generation technology.

The emissions rates for Nova Scotia Power and New Brunswick Power are set to be reduced in the coming years as a result of the Canadian government's mandated retirement of coal power plants by 2030. This

¹⁶ Taken from page 23 of the 2022 Maritime Electric Sustainability Report

[^{\(}https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf\)](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf)

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would result in Maritime Electric's carbon emissions falling if it were to continue its energy purchase agreement with NBEM.

Table 3-4 — Historical Carbon Emissions Rates for Various Utilities/Locations

Notes/Sources:

- 1) Carbon emissions rates for Maritime Electric are taken from the 2022 Maritime Electric Sustainability Report [\(https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf\)](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf) and are all inclusive of electricity produced by Maritime Electric's generators, imported electricity, vehicle emissions, building heating, and other related items.
- 2) Carbon emissions for Nova Scotia are taken from Nova Scotia Power's emission reporting database [\(https://www.nspower.ca/cleanandgreen/air-emissions-reporting\)](https://www.nspower.ca/cleanandgreen/air-emissions-reporting) and are inclusive of electricity produced by Nova Scotia Power's generators and imported electricity.
- 3) Carbon emissions for New Brunswick are taken from the Canada Energy Regulator database [\(https://www.cer](https://www.cer-rec.gc.ca/en/data-analysis/energy-markets/provincial-territorial-energy-profiles/provincial-territorial-energy-profiles-new-brunswick.html)[rec.gc.ca/en/data-analysis/energy-markets/provincial-territorial-energy-profiles/provincial-territorial-energy-profiles-new](https://www.cer-rec.gc.ca/en/data-analysis/energy-markets/provincial-territorial-energy-profiles/provincial-territorial-energy-profiles-new-brunswick.html)[brunswick.html\)](https://www.cer-rec.gc.ca/en/data-analysis/energy-markets/provincial-territorial-energy-profiles/provincial-territorial-energy-profiles-new-brunswick.html). Emissions rates are based on 2019 and 2020 data as data for 2021 is not provided.
- 4) Carbon emissions rates for Hydro Quebec are taken from the following source:
- <https://www.hydroquebec.com/data/developpement-durable/pdf/d-5647-affiche-co2-2021-an-vf.pdf> 5) Carbon emissions rates for Newfoundland and Labrador Hydro are taken from the Canada Energy Regulator database [\(https://www.cer-rec.gc.ca/en/data-analysis/energy-markets/provincial-territorial-energy-profiles/provincial-territorial-energy](https://www.cer-rec.gc.ca/en/data-analysis/energy-markets/provincial-territorial-energy-profiles/provincial-territorial-energy-profiles-new-brunswick.html)[profiles-new-brunswick.html\)](https://www.cer-rec.gc.ca/en/data-analysis/energy-markets/provincial-territorial-energy-profiles/provincial-territorial-energy-profiles-new-brunswick.html). Emissions rates are based on 2019 and 2020 data as data for 2021 is not provided.
- 6) Carbon emissions rates for ISO-New England are taken from the 2020 ISO-New England Electric Generator Air Emissions Report [\(https://www.iso-ne.com/static-assets/documents/2022/05/2020_air_emissions_report.pdf\)](https://www.iso-ne.com/static-assets/documents/2022/05/2020_air_emissions_report.pdf)
- 7) Carbon emissions rates for Canada are taken from the Canada Energy Regulator database for 2020 (https://www.cerrec.gc.ca/en/data-analysis/energy-markets/provincial-territorial-energy-profiles/provincial-territorial-energy-profilescanada.html#:~:text=The%20greenhouse%20gas%20intensity%20of,%2FkWh%20(Figure%208).)
- 8) Carbon emissions rates for the United States are taken from the U.S. Energy Information Agency website for 2020 (https://www.eia.gov/tools/faqs/faq.php?id=74&t=11#:~:text=In%202020%2C%20total%20U.S.%20electricity,CO2%20emissions %20per%20kWh).

It is important to note that while Hydro Québec and Newfoundland and Labrador Hydro have a significant amount of carbon free generating capacity, there currently is a lack of electricity transmission infrastructure in place to support a large-scale increase in energy exports from these utilities throughout the region. In the event that regional transmission infrastructure is expanded, Maritime utilities would likely benefit from long term clean energy contracts with Hydro Québec and/or Newfoundland and Labrador Hydro. Currently Québec and New Brunswick are exploring adding additional transmission capacity between the provinces. In addition, the proposed Atlantic Loop Project would create a transmission loop through eastern Canada so that zero carbon energy could be transported through the region. A diagram of the proposed project is included in [Figure 2-6](#page-349-0) and duplicated below.

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Figure 3-1 — Proposed Atlantic Loop Project Diagram¹⁷

Given the size of the project, different levels of Canadian governments involved, and sizable investment required, a final decision on whether the project will be fully implemented has not been made. As a result, the transmission system cannot currently accommodate a substantial increase in energy imports and exports between Canadian provinces.

It is also important to note that there is a strong likelihood that any future purchases from Hydro Québec and/or Newfoundland and Labrador Hydro that Maritime Electric might be able to secure would be for energy only, and potentially on an interruptible basis. As such, Maritime Electric would need to find alternative means to meet its regional capacity obligations, either through generation capacity installed on PEI or purchased from the mainland.

3.2.1. Carbon Emissions Improvement From Battery Energy Storage

In order to help quantify how much the addition of battery energy storage on PEI could be able to help reduce Maritime Electric's carbon emissions, an hourly calculation of system generation and emissions was developed. The calculation estimated emissions for a variety of different scenarios. The scenarios considered include three different levels of island wind generation:

¹⁷ Clean power Roadmap for Atlantic Canada,

https://www.nrcan.gc.ca/sites/nrcan/files/energy/images/publications/2022/A%20CLEAN%20POWER%20ROADMAP %20FOR%20ATLANTIC%20CANADA-ACC.pdf

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- 1. Current system installed wind capacity, for a total system nameplate capacity equal to 92.5 MW, current system (2022) load
- 2. Additional 70 MW of wind capacity, for a total system nameplate capacity equal to 162.5 MW, expected 2025 system load
- 3. Additional 120 MW of wind capacity (in addition to Scenario 1), for a total system nameplate capacity equal to 212.5 MW, expected 2025 system load

The wind capacity in Scenario 1 represents the current system, while the wind capacity in Scenario 2 represents the likely amount of installed wind that will be under contract with Maritime Electric in the near future (potentially by 2025). Scenario 3 represents a more aggressive wind development plan and is included for comparison purposes and future planning. Both Scenarios 2 and 3 consider an estimated hourly load forecast for 2025, while Scenario 1 considers the current hourly system load.

For each of the scenarios, different BESS installation cases are considered. Our estimate of the capital costs associated with the BESS systems is also provided, based on our detailed capital cost buildups detailed in [Appendix A.](#page-418-0)

- a) No BESS is added to PEI
- b) A single 50 MW, 2-hour BESS (100 MWh storage) is added to PEI (CAD \$78 Million)
- c) A single 50 MW, 4-hour BESS (200 MWh storage) is added to PEI (CAD \$134 Million)
- d) A single 50 MW, 8-hour BESS (400 MWh storage) is added to PEI (CAD \$244 Million)

Calculations are based on the assumption that the addition of BESS to the island would allow Maritime Electric to better manage the generation from the wind power plants installed on PEI. Currently, during times when the wind generation causes total system generation to exceed system load, Maritime Electric is forced to sell excess PEI wind energy to the mainland. At present, the frequency at which this occurs is very low; however, it would likely occur at a higher rate in the future as more wind power plants are installed on PEI. The addition of BESS could store some, or all, of the excess wind generation for re-injection at a later time. Maritime Electric could then reduce the amount of energy it needs to purchase from the mainland by instead using the re-injected wind energy from the BESS. Since the energy from the mainland is generated using some carbon-emitting power plants, the addition of BESS would help Maritime Electric reduce carbon emissions.

The model developed to investigate carbon emissions performs calculations on an hourly basis, then presents the results on an annual basis. Calculations are based on historical Maritime Electric hourly system load and generation data from the last four years. The BESS is modeled such that it charges off wind energy that otherwise would have to be sold back to the mainland due to energy oversupply. The modeled BESS then injects this energy back into system after total system generation falls below system load. The energy the BESS injects back into the system displaces energy that would otherwise have to be

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imported from New Brunswick or generated by Maritime Electric's diesel-fired generators. In addition, the model conservatively assumes the BESS is able to further reduce the amount that the diesel-fired Maritime Electric generators operate by 100% (this assumption is conservatively high as the addition of BESS cannot completely eliminate the need for the island's diesel-fired generation). The modeled BESS is assumed to have an 85% round trip efficiency. At a high level, the calculation provides a simplified look in the potential benefits of BESS from a carbon reduction perspective versus the capital investment of the BESS.

The results of the analysis are provided in [Table 3-5.](#page-363-0) The data reported includes the following variables:

- **Gross wind generation (MWh)**: This variable is the estimated total amount of on-island wind generation that is purchased by Maritime Electric annually. It includes both the wind generation that Maritime Electric is able to sell to their customers, in addition to generation that might have to be sold by Maritime Electric to the mainland as a result of generation oversupply during some subset of hours in the year.
- **Wind generation sold to MECL customers (MWh)**: This is the annual PEI wind generation that is sold to the Maritime Electric customers. The addition of BESS helps to increase this variable because the BESS is able to absorb some portion of the energy that would otherwise have to be sold to the mainland (due to periods where there is energy oversupply) and inject it back into the system at a later time.
- **Percent of PEI wind generation purchased by MECL that is sold to MECL customers (%)**: This is the ratio of the two previous variables.
- **Total generation carbon emissions, all electricity delivered to MECL customers (tonnes CO2e)**: This variable tracks the estimated amount of carbon emissions associated with the electricity that Maritime Electric sells to their customers. This variable includes estimated carbon emissions associated with electricity purchased from mainland power plants (via NBEM), based on NBEM's most recent carbon emissions rates (tonnes CO₂e vs GWh produced).
- **Carbon emissions ratio for all electricity delivered to MECL customers (kg/kWh)**: The carbon emissions ratio is the amount of carbon emissions per kWh. This variable is useful to track carbon emissions rates from one location to another, such as to the locations in [Table 3-4.](#page-358-0)
- **Percent of electricity sold to MECL customers that is carbon free (%)**: This variable tracks the percentage of MWhs that Maritime Electric sells to their customers that are generated with carbon free resources.

The results of the analysis indicate that with the amount of wind generation installed on PEI currently, there are very few times when high wind generation results in there being an oversupply of electricity generation on the island. As a result, with the amount of wind capacity installed on PEI today, a BESS system is not needed to shift excess wind generation to other times.

As more wind is installed on the island, there are more times when there will be an oversupply of electricity generation. As a result, BESS becomes more beneficial; however, the benefit is fairly modest. For example, an addition of a 50 MW, 4-hour BESS to the scenario with 70 MW of additional wind (162.5 MW of wind

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capacity total) yields a reduction in overall carbon emissions of just 1.2% (from 219,074 to 216,350 tonnes CO2e) from the scenario without BESS. Considering the level of investment required for a 50 MW, 4-hour BESS system (estimated at CAD \$134 million), we consider the associated reduction in overall carbon emissions from BESS to be a low value for PEI on a dollars-invested per carbon reduction perspective. The cost per carbon reduction is calculated equal to CAD \$49 thousand per tonne CO₂e reduction for the BESS system. By comparison, the addition of 70 MW of wind generation on the island is estimated to reduce future carbon emissions by 14% (from 254,622 to 219,074 tonnes CO₂e) without considering BESS. This reduction in carbon emissions is over 10x higher than that resulting from the addition of the 4-hour BESS alone. Furthermore, we estimate that the cost of adding 70 MW of additional onshore wind generation would be similar to cost of adding a 50 MW, 4-hour BESS; however, on a dollars-invested per carbon reduction perspective, wind would be considerably less expensive. The cost per carbon reduction is calculated equal to CAD \$4 thousand per tonne $CO₂e$ reduction for the onshore wind. Detailed cost comparisons of the various technologies considered in this report are provided in [Appendix A.](#page-418-0)

There are a significant number of times when high wind generation results in an oversupply of overall electricity generation on the island in the scenario where 120 MW of additional wind is operational (212.5 MW of wind capacity total). BESS provides the highest benefit in terms of improving overall carbon emissions in this wind capacity scenario; however, the benefit is still fairly small, especially for the smallersized BESS cases. A key takeaway from this scenario is that PEI and Maritime Electric should have a plan on how to manage excess electricity generation as higher amounts of wind are installed on the island. S&L did not investigate alternative approaches to managing this generation beyond BESS; however, one alternative approach would be to address this contractually, whether with the wind generators, PEI's neighbours, or other parties, in such a way that provides more flexibility for the island and maximizes value for customers. This is discussed more in Section [3.3.](#page-364-0)

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3.3. EFFECTIVELY REDUCING CARBON EMISSIONS

Maritime Electric's 2022 Sustainability Report presents a goal of reducing greenhouse emissions by 55% by 2030. Achieving this goal will require Maritime Electric to implement substantial changes to how it serves load. This section discusses the most effective methods Maritime Electric and PEI can pursue to help reduce carbon emissions.

• **Integration of additional wind generation on PEI**: Frequent and strong winds are one of PEI's best resources from a power generation perspective. The capacity factors of the most recently developed wind farms on PEI frequently see levels approaching 50% or higher, which is among the highest in the energy industry for land-based wind generation. PEI has already integrated a significant amount of wind generation on the island (through development by the PEI Energy Corporation); however, the further development of wind generation on PEI would be one of the most effective ways Maritime Electric could achieve their greenhouse gas reduction goals by 2030. For reference, Maritime Electric is anticipating an additional 70 MW of wind generation being developed on PEI through the PEI Energy Corporation, operational in near future.

One challenge that Maritime Electric will have to address as more wind generation is developed on PEI is how best to manage times when there may be excess wind generation beyond system load. Currently, this occurs very infrequently, but it will occur with more frequent regularity as higher levels of wind capacity are integrated. As illustrated in the previous sections, the addition of BESS onto PEI would only be able to marginally improve the system from the perspective of managing excess wind generation and improving carbon emissions for Maritime Electric. As a result, BESS is not recommended to address this challenge. Instead, Maritime Electric may be required to address this challenge contractually, whether with the wind generators, PEI's neighbours, or other parties.

Specifically, Maritime Electric might pursue contracts that allow more flexibility, favorable terms, and/or alternative financial arrangements to better address the higher likelihood of curtailment of the island wind power plants. For example, Maritime Electric could pursue payment structures with a price per MWh that varies by hour/season, with the price for the hours with the highest likelihood of curtailment being lowest. Maritime Electric might also explore including a fixed per MW price structure (either in addition to or replacing the per MWh price structure), which would help to fix the payments for the wind generation per month, while also sharing some of the cost burden of curtailment with the wind project owner (since the wind project owner would have to forecast project curtailment in order to properly determine its best per MW price). Alternatively, Maritime Electric might be able to set up an agreement with a mainland offtaker, like New Brunswick Power or Nova Scotia Power, to buy any excess wind generation for a fee.

In addition, as more wind generation is integrated onto PEI, the importance of load- and renewablebalancing resources increases. At present, energy purchased through NBEM is used to meet Maritime Electric's system balancing needs. With more integrated wind generation, there will be larger swings in totaled (summed) hourly generation from the wind farms. If load- and renewablebalancing needs were continued to be met with energy purchased from NBEM, the larger swings in hourly generation from PEI's wind would be more costly for mainland generators to balance. These costs would ultimately be passed contractually onto Maritime Electric and their customers.

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Sargent & Lundy 37 While wind generation is a great source of carbon free energy, it is not a good source of generation capacity due to its intermittent nature (see [Appendix C\)](#page-432-0). As a result, even with a large number of on-island wind power plants, Maritime Electric will need to meet their required capacity obligations using other resources, whether installed on the island or purchased from the mainland. This is discussed in detail in Section [2.1.](#page-330-0)

Finally, the continued integration of wind generation will necessitate transmission upgrades on PEI, especially in the western portion of the island where there is considerable wind energy interest but a lack of the necessary transmission facilities to transport the energy. Without these upgrades, it will not be possible for large amounts of additional wind generation to be added to the system.

- **Further implementation of demand-side management**: A low-cost and effective solution that would help to reduce PEI's carbon emissions is a prudent DSM program. DSM focuses on reducing energy consumption using a variety of methods, including integrating modern technologies (e.g., smart meters, push communications, etc.), influencing customer behavior (e.g., through time-of-use electricity rates, education, etc.), and by improving system efficiency. Currently, PEI's DSM plan is managed by the efficiencyPEI. The successful growth and adoption of PEI's DSM plan will help to partially offset the expected energy consumption growth in PEI resulting from both population increase and the PEI residents' continued transition away from oil-fired heating to electrical heating in homes. Any reductions in energy consumption from DSM would equate to fewer MWh purchased from the mainland, which would result in both carbon emission reductions and cost savings for Maritime Electric's customers.
- **Integration of additional solar generation on PEI**: The addition of solar generation onto PEI will help to reduce carbon emissions on the island. In addition, solar PV is among the lower cost generation technologies available today. Given PEI's solar resource is much lower than PEI's wind resource (the expected capacity factor for new wind farm on PEI is near 45%, while the expected capacity factor for a new solar PV power plant on PEI is approximately 20% - see [Appendix D](#page-435-0) for detailed calculations), the priority should be to develop additional wind generation on PEI. However, additional solar PV can provide carbon-free energy diversity to Maritime Electric's generation portfolio at a relatively low cost; thus, should be part of the solutions Maritime Electric can utilize to reduce carbon emissions moving forward¹⁸.

Similar to wind generation, solar PV generation is a good source of carbon free energy, but it is not a good source of generation capacity due to its intermittent nature. Given this, Maritime Electric will still need to meet their regulatory capacity obligations using other resources, whether installed on the island or purchased from the mainland. This is discussed in detail in Section [2.1.](#page-330-0)

Two additional considerations that are likely to help Maritime Electric reduce carbon emissions are included below. While Maritime Electric does not have direct control over the implementation of these items, their implementation/progress is likely to benefit Maritime Electric and PEI.

• **The retirement of coal generation in Canada by 2030**: While Maritime Electric does not own any coal power plants, some portion of the energy it purchases through the NBEM EPA is generated from coal power plants. As a result, the retirement of coal throughout Canada by 2030, along with

¹⁸ Net metering small-scale renewable energy installations such as rooftop solar can cause cross-subsidization issues where non-solar customers are in effect subsidizing the system costs of solar customers.

the further decarbonization of the power sector in Canada, will benefit Maritime Electric from a carbon emissions perspective as it continues to purchase energy from the mainland.

• **Expansion of regional transmission capacity**: As discussed previously, Hydro Québec and Newfoundland and Labrador Hydro have a significant amount of carbon free hydroelectric generating capacity and future generating capability; however, there currently is a lack of electricity transmission infrastructure in place to support a large-scale increase in energy exports from these utilities throughout the region. If regional transmission infrastructure is expanded, Maritime utilities would be able to benefit from long term clean energy contracts with Hydro Québec and/or Newfoundland and Labrador Hydro. It is important to note that there is a strong likelihood that any future purchases from Hydro Québec and/or Newfoundland and Labrador Hydro that Maritime Electric might be able to secure would be for energy only, and potentially on an interruptible basis. As such, Maritime Electric would need to find alternative means to meet its regional capacity obligations, either through generation capacity installed on PEI or purchased from the mainland.

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4 . C A P A C I T Y R E S O U R C E C O M P A R I S O N

4.1. TECHNOLOGIES CONSIDERED

This section compares a number of different capacity resource technologies based on initial input from both Maritime Electric and S&L. The list of technologies considered is provided below:

- Wind power, both onshore and offshore
- Solar power, both photovoltaic (PV) utility and rooftop scale, and concentrating solar power (CSP)
- Battery energy storage systems (BESS), lithium-ion, other storage technologies
- Reciprocating internal combustion engine (RICE), operating both on traditional and renewable fuels
- Combustion turbines (CT), aeroderivative models, operating both on traditional and renewable fuels
- Biomass power plant, operating on different types of biomass
- Nuclear power plant, small modular reactor (SMR)
- Tidal stream power plant or wave power plant
- Geothermal power plant
- Fuel cells

The following subsections provide an overview of the different technologies listed above, including considerations specific to PEI.

4.1.1. Wind Power

Wind energy is produced from wind turning the blades of a turbine which in turn spins a generator, creating electricity. Wind energy is a renewable source of power that releases no carbon emissions. The amount of power generated is dependent on the real-time wind speed; thus, generation from wind power plants is variable.

Wind turbines can be placed either onshore or offshore. Offshore wind generally provides higher, more consistent energy outputs than onshore wind because of the typically higher and more consistent wind speeds over bodies of water. However, onshore wind is much less expensive than offshore wind because the construction of offshore wind power plants is more complex and extensive than that of onshore power plants. Construction of offshore wind farms is more challenging as boats and special equipment are required. Offshore turbines also typically require more maintenance than those onshore due to various environmental factors, including corrosion facilitated by salt in the ocean.

Consistent and strong wind speeds are one of PEI's best resources from a power generation perspective. New wind farms on PEI could approach a 50% capacity factor on an annual basis, which is among the

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highest in the energy industry for onshore wind farms. Maritime Electric already has under contract a total of 92.5 MW of wind capacity that it utilizes to serve load, and an additional 70 MW of wind generation is planned. Wind is a clean energy source and its continued development on PEI will be a key part in helping Maritime Electric to achieve its carbon emission reduction goals.

Table 4-1 — Wind Energy Advantages and Disadvantages

4.1.2. Solar Power

Utility-scale and rooftop solar photovoltaic (PV) both employ solar panels to convert energy from the sun into usable electricity. Energy from the sun is absorbed by PV cells that make up the solar panel. This energy creates electrical charges on the atomic level within the PV cell. These charges create an electric current that is used as electricity. Solar PV is a renewable source of energy. Since the production of electricity from solar PV is based on the energy provided by the sun, electricity production is limited based on the time of day and weather conditions. Solar PV power plants have seen significant growth in popularity over the most recent decades due to their low cost and simplicity.

There are different types of PV panels and racking configurations that can impact/improve a solar PV power plant's generation. Solar power plants can utilize monofacial or bifacial solar panels. Monofacial panels are one sided and very common in the energy industry, while bifacial panels have grown in popularity over the most recent years and have the ability to absorb the sun's light on both the front and the reverse side of the panel. Bifacial panels are more expensive than monofacial panels but can help to increase the generation of a solar power plant, especially in locations where the ground reflectivity is high (i.e., light colored ground, snow, etc.). Bifacial panels are typically only used in utility-scale solar power plants, not in small-scale rooftop applications, because they require some ground clearance to maximize the amount of reflected light to the reverse side of the panel. [Figure 4-1](#page-369-0) provides a simplified illustration of how a bifacial solar PV panel works.

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Figure 4-1 — Illustration of Bifacial Solar PV Panel

The two most common racking configurations are fixed-tilt and single-axis tracking. A fixed-tilt racking configuration is simple, in that during construction the panels are initially orientated in such a way that maximizes the amount of solar energy the panels can capture. The panels remain orientated in this position for the lifetime of the project. Fixed tilt configurations are relatively inexpensive and common both for utilityscale projects and in smaller-scale rooftop applications. In a single axis tracking configuration, panels are affixed to a motorized tracker that follows the sun throughout the day on a single axis, keeping the panels always in a position that maximizes the amount of solar energy they are able to absorb. Single-axis tracking helps to increase the amount of solar energy absorbed by the panels over a fixed-tilt configuration, especially during the morning and late afternoon, when the sun is lowest on the horizon. [Figure 4-2](#page-369-1) is a simple illustration of how a single-axis tracking configuration operates.

For PEI, solar PV generation is a viable renewable resource that can help Maritime Electric lower carbon emissions. Due to PEI's northern latitude and climate, the potential generation from solar PV installed in PEI will be lower than sites located closer to the equator / in arid climates. S&L developed forecasts of the expected solar generation on PEI using the program PVsyst. PVsyst is a commonly used solar PV design and forecasting program utilized in the energy industry. Four different cases were run:

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- 1. A fixed-tilt racking configuration with monofacial solar panels
- 2. A fixed-tilt racking configuration with bifacial solar panels
- 3. A single-axis tracking racking configuration with monofacial solar panels
- 4. A single-axis tracking racking configuration with bifacial solar panels

Each forecast incorporates PEI-specific solar irradiation and climate data, along with S&L's project assumptions regarding expected project design, module layout, electrical and system losses, etc. The results are developed for 10 MW solar PV power plants and include capacity factor, expected annual generation for the 10 MW power plant, and also the expected annual generation if five 10 MW power plants are installed. Detailed PVsyst reports of the different systems are provided in [Appendix D.](#page-435-0) For comparison to the data in the table below, the newest wind power plants on PEI achieve capacity factors of just under 50%. A new 50 MW wind power plant on PEI might expect to generate over 200,000 MWh annually.

Table 4-2 — Solar PV Forecasts

For PEI, S&L has modeled a fixed-tilt, bifacial configuration. While it is feasible to build a single-axis tracking configuration on PEI, the island's cold climate could make it more challenging to reliably operate a tracking system due to ice and snow buildup on components. Our recommendation of bifacial panels stems from the fact that bifacial panels tend to work well in locations that see snow accumulation (like PEI), due to the high reflectivity of snow.

Table 4-3 — Solar PV Advantages and Disadvantages

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Another type of power plant that utilizes solar energy to generate electricity is a concentrated solar power (CSP) plant. There are different CSP plant configurations, but one common type of CSP plant captures direct solar radiation by reflecting it to a central receiving tower using mirrors. The reflected solar energy heats the central receiving tower, which contains a high temperature fluid or molten salt that absorbs the energy. The heated liquid is then used to produce steam, which drives a steam turbine to produce electricity. Alternatively, a plant can be designed such that mirrored troughs are used to reflect sunlight into a fluid flowing through a pipe. The heated fluid drives a steam cycle. S&L has worked on a number of different CSP plants across the globe. These types of power plants are best suited for arid climates that receive very high amounts of solar irradiance, for example the Atacama Desert in Chile, various locations in Spain, the southwest United States, etc. Due to its location and climate, PEI is not a suitable location for a CSP plant.

4.1.3. Energy Storage

Energy storage systems store energy generated at one time for use at another time. A battery energy storage system (BESS) consists of many electrochemical batteries that collect energy from the power source and discharge that energy to the grid when it is needed. A BESS can be utilized for numerous different purposes including energy time shifting, providing system capacity, ancillary services, transmission support, renewable and load balancing, and other similar purposes. A BESS can be designed for more than one use case. Lithium-ion BESS is the most common battery type employed in the energy industry due to cost, thermal properties, and life-cycle benefits. A distinct advantage of a BESS project is that it can inject energy into an electrical system virtually instantaneously. A typical lithium-ion BESS arrangement is provided below in [Figure 4-3.](#page-371-0)

A lithium-ion BESS typically has a round trip efficiency of 85-90%, meaning that between 10%-15% of energy entering the battery is lost during the storage process. In addition, a BESS degrades with usage, which results in the need to augment the BESS and add additional batteries to the system in order for the BESS to continue to achieve its originally designed performance levels. BESS projects are not required to

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perform augmentation; however, an un-augmented BESS project might expect to see performance degradation on the order of 25% to 30% over a 20-year lifespan. The amount of energy stored by a BESS project can vary from project to project based on the size of the battery installed. Like wind and solar PV generators, BESS is an inverter-based resource.

Table 4-4 — Lithium-Ion BESS Advantages and Disadvantages

While there are other types of BESS technologies, lithium-ion BESS is the type that is predominantly utilized in the energy industry. For example, flow batteries are a similar technology to that of lithium-ion batteries but employ a tank of liquid electrolyte to charge and discharge separate from the electrodes. Flow batteries can provide longer storage with little to no degradation as compared to lithium-ion batteries; however, the round-trip efficiency is typically lower than lithium-ion batteries (typically in the 65% to 80% range). Currently, flow battery technology has not been widely adopted for use in the energy industry. For this reason, it is not recommended for Maritime Electric's generation portfolio at this point in time.

Compressed air energy storage (CAES) is another storage technology that has yet to see mainstream adoption in the energy industry but offers promise for the future. In a CAES system, electricity is used to power an air compressor, then air is pumped and pressurized into an underground cavern or tank. When it is needed, the air is released through a turbine to produce electricity. Significant amounts of air can be stored for long periods of time. A drawback of compressed air storage as compared to lithium ion batteries is that a CAES system typically has a lower round trip efficiency. On a utility scale, there are only a handful of CAES systems in service today. There is significant risk associated with being an early adopter of a technology; thus, a CAES system is not recommended for Maritime Electric at this point in time.

4.1.4. Reciprocating Internal Combustion Engine

A reciprocating internal combustion engine (RICE) operates by converting heat and pressure generated by the combustion of fuel into mechanical energy. Energy is derived from a set of pistons, where the fuel is

ignited within the piston and the subsequent increase in pressure drives the piston outward. Engines are common in the power industry, in automobiles, and in many other applications. While the acronym "RICE" technically refers to all types of engines, it is commonly used in the energy industry and by electric utilities to refer to large electricity-producing engines. From a fundamental perspective, utility-scale RICE generators are essentially the same as what an individual might find in an automobile, just the size of a utility-scale engine is much bigger and utility-scale engines are used to spin an electrical generator, rather than an automobile's wheels.

In general, RICE generators are a mature technology that offer a combination of modularity and dispatch flexibility. The modular aspect of RICE relates to the fact that individual engines are small in size (typically less than 20 MW); thus, power plants can be economically constructed to meet load demands of virtually any size (i.e., for larger loads, a utility can simply purchase more engines). The flexible nature of engines is related to their ability to start up / shut down and ramp up / down quickly and with little, if any, associated increase in operational costs or performance degradation. Over the last ten years, S&L has seen an uptick in utility interest in RICE power plants due to their modularity, dispatch flexibility, and competitive development and operations costs. Utilities have also found that the flexible dispatch capabilities of RICE power plants complement renewable energy well: an engine's ability to start and ramp quickly can help to offset the variable generation profiles of wind and solar energy. For PEI, an engine would serve virtually exclusively as a backup generator, dispatching only during the times when enough energy could not be procured from the mainland, during emergencies (i.e., disconnections from the mainland), or other similar situations. RICE would serve this purpose well.

There are a number of companies that manufacture engines that would fit the needs of PEI. In addition, modern engines are relatively fuel efficient, with heat rates typically around 8,500 Btu/kWh in a simple cycle configuration. A benefit of RICE is that it can operate on a variety of different fuels, including diesel fuel, natural gas, biodiesel, a mixture of natural gas and hydrogen, and pure hydrogen likely within 3 to 5 years¹⁹. Some modification to the engine components would be required to convert an engine to operate on very different fuels. For example, modifications would be required to convert an engine that primarily operates on diesel/biodiesel to be able to operate on hydrogen, but in general, the variety of fuels compatible with RICE would help PEI to reduce the risk of having a stranded asset if Canadian regulations changed the allowable fuels that could be used for power generation. For reference, traditional diesel and biodiesel are similar enough in composition that many of the most common RICE units available today can fire either without needing significant modifications (some minor modifications to balance of plant equipment/storage would be required to allow for biodiesel firing).

¹⁹ Per recent discussions with engine original equipment manufacturers that S&L commonly work with

From a carbon emissions perspective, RICE does produce carbon dioxide when burning diesel fuel, natural gas, and biodiesel. Carbon emissions when burning natural gas are significantly lower than when burning diesel fuel. Biodiesel combustion produces lower emissions than typical diesel fuel; however, the lifecycle emissions (considering net emissions from the entire production process of the fuel) of biodiesel are much lower than typical diesel fuel. In fact, the lifecycle emissions are low enough that the government of Canada considers biodiesel as a renewable fuel²⁰.

Table 4-5 — RICE Advantages and Disadvantages

4.1.5. Combustion Turbine

Combustion turbines (CT) work similarly to RICE but rather use a turbine instead of a piston to generate electricity. Air is drawn into a compressor, where it is pressurized and fed into the combustion chamber. The fuel mixes with the air and combusts, creating a high-pressure gas that expands and drives a turbine to produce electricity. There are two types of combustion turbines: frame (industrial) and aeroderivative (which share many similarities to the jet engines that power airplanes). In general, the differences between the aeroderivative and frame turbines are weight, size, combustor and turbine design, bearing design (antifriction bearings for aeroderivative turbines and hydrodynamic ones for frame turbines), and the lube oil system. Frame combustion turbines are also field erected and maintained in place, whereas aeroderivative turbine plants are designed for a quick replacement of the entire engine when maintenance is required.

CTs have a representative heat rate of 9,000 to 10,000 BTU/kWh in a simple cycle configuration, which makes them less efficient than RICE. When compared to a RICE, CTs provide a smaller footprint per MW output. CTs can run on various fuel types including diesel fuel, natural gas, biodiesel, a mixture of natural gas and hydrogen, and pure hydrogen likely in the near future (at present there are not yet commercially available CTs that can operate on 100% hydrogen). Because of the combustion process, CTs emit carbon and other greenhouse gases. Alternative fuel sources can help to reduce or eliminate carbon emissions.

²⁰ https://www.nrcan.gc.ca/energy-efficiency/transportation-alternative-fuels/alternative-fuels/biofuels/biodiesel/3509

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Modifications to the CT components would be required to convert a CT to operate on different fuel types, and in general these modifications would be slightly more extensive than might otherwise be required to convert a RICE unit. For example, while a RICE unit would not require modifications to be able switch from traditional diesel to biodiesel outside of some minor changes to the balance of plant (BOP) and storage systems, a CT would require specialized equipment such as compatible fuel injection nozzles, combustors, etc., to be able to operate on biodiesel (in addition to the changes to the BOP and storage systems that would also be required for a RICE unit). We estimate the cost of the CT equipment modifications would be modest, in the CAD \$2.5 to \$3.0 million range, for a CT size in the 30 MW range.

CTs are a mature technology with fast startup and ramping capabilities. The technology is used throughout the energy industry for a wide variety of different purposes. Similar to RICE, the flexible dispatch capabilities of CTs complement renewable energy well: CT's ability to start and ramp quickly can help to offset the variable generation profiles of wind and solar energy. For PEI, a CT would serve predominantly as a backup generator, only needed to produce electricity in the event that a sufficient amount of energy cannot be imported from the mainland (which occurs on an infrequent basis throughout the year), during emergencies, or other similar situations.

4.1.6. Biomass Burning Power Plant

Biomass power generation facilities rely on the combustion of biomass to generate power. Biomass is fed into the power plant's combustion chamber and burned to produce high-pressure steam. The steam is used to turn a turbine and produce electricity. The type of biomass used to power these generators typically consists of crops, wood, municipal waste, or other organic matter.

Due to the relatively low energy content of solid biomass fuel (e.g., wood typically has approximately 30%- 50% of the energy content of commonly used petroleum fuels on a per-mass basis), a significant amount of biomass is required to fuel a power plant. This translates to the power plant requiring very large plots of land to grow the necessary fuel. As an example calculation, a 50 MW biomass power plant operating 70%

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of the year (a biomass power plant would likely need to operate as a baseload facility due to its operational inflexibility) would consume approximately 3,990,000 MMBtu of fuel in energy each year (a typical biomass power plant heat rate is 13,000 Btu/kWh). Assuming the fuel is pelletized wood, the energy content of wood varies by wood type, but a value of approximately 17 MMBtu/ton is a reasonable estimate. This equates to approximately 235,000 tons of wood required per year. While trees vary in weight based on their size, if each tree utilized weighed 1 ton, this would equate to 235,000 trees required per year to fuel the biomass power plant. As a rough estimate, assuming a tree farm can support 1,000 trees per acre, the power plant would need to cut down and replant approximately 235 acres of tree farmland per year. Furthermore, since trees take many years/decades to grow and thus could not be re-harvested immediately, trees from different 235-acre plots of land would have to be harvested each year until the original re-planted trees were mature. Ultimately, thousands of acres of land could be needed to grow the required fuel to support the operation of a biomass power plant.

In addition, due to the fundamental design of a biomass power plant as a large water boiler, a biomass power plant is not typically able to start / ramp output quickly relative to other thermal technologies like engines or combustion turbines. Biomass power plants also require a significant amount of staff to operate (as compared to other technologies like RICE or CTs).

Biomass power plants are considered renewable resources by the Canadian government, so long as the rate of consumption of the biomass does not exceed the rate of biomass regeneration. Burning of biomass in a power plant does release carbon dioxide; however, the net lifecycle emissions (which include the carbon dioxide absorbed by the biomass as it grows) are substantially less than that of thermal power plants that consume traditional fossil fuels.

4.1.7. Small Modular Nuclear Reactors

A significant amount of research into nuclear power has been ongoing over the most recent decades, and the technology that shows significant promise is small modular reactors (SMRs). Recent developments in the engineering of SMRs have broadened the potential applications of nuclear power with increased

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flexibility, safety, and ease of implementation. Nuclear fission has a legacy of reliable carbon-free power generation, and advanced SMR technology presents an attractive option for utilities interested in strengthening their portfolios with emission-free on-demand generation. These smaller reactors are well suited to be installed individually or in multiple-reactor configurations and distributed in locations where generation is needed, thereby reducing the costs and challenges of long-distance transmission associated with larger centralized installations.

Light water reactor designs generating 300 MW or less are typically considered to be SMRs. A traditional nuclear plant normally consists of one to two reactors, each capable of producing hundreds to more than 1,000 MW. The SMR concept allows a site to design to its demand, offering solutions not traditionally suitable for large nuclear plants, and scalability by allowing the addition of modules as demand grows. More than 70 SMR concepts are currently under development across the world.

As with all nuclear power plants, proper disposal of the used fuel is an important consideration. In addition, development of an SMR power plant would require significant capital investment, permitting/licensing, and time to develop. Given Maritime Electric's need to have additional capacity operational in the short term, an SMR was not selected as a short-listed technology due to the long amount of time it would take for a new SMR power plant to be operational.

Table 4-8 — Nuclear-SMR Advantages and Disadvantages

4.1.8. Tidal and Wave Power

Tidal and wave energy derive their power from the ocean. Tidal energy is power produced by capturing the surge of the ocean waters during the rise and fall of the tides. There are three types of tidal power: tidal barrage, tidal stream, and tidal lagoon. A tidal barrage employs a large dam with underwater turbines. The barrage gates open as the tide is coming in and shut at high tide, creating a pool behind the barrage. The tidal barrage then functions much like a dam, slowly letting water out through the turbines, generating electricity. A tidal lagoon functions similarly to the barrage with the difference being that the lagoon is manmade by a barrier along the coast. Unlike the barrage, the lagoon would be able to harness power as it is filling and emptying, allowing for more continuous power. Tidal stream power involves the use of underwater turbines. This is similar to wind generation; however, potentially more powerful since water has a much higher density than wind. Wave power generates electricity by harnessing the energy in ocean waves. There are different potential designs; however, many utilize floating pistons that move with the

waves, generating electricity. All forms of tidal power and wave power are heavily location dependent. If the location of interest does not have high enough tides, or strong enough waves, the power output would be low. At present, there are only a handful of tidal power facilities in operation today. Similarly, wave power is still primarily a demonstration-stage technology and has not seen energy industry acceptance. From this perspective, there would be a risk for Maritime Electric to deploy either tidal or wave power in that they would be early adopters of the technologies.

Table 4-9 — Tidal and Wave Energy Advantages and Disadvantages

4.1.9. Geothermal

Geothermal power is derived from harnessing heat from within the earth. Geothermal power plants are renewable resources. To capture the heat, wells can be drilled into the earth to pipe steam or hot water to the surface. This steam/hot water is then used to power a turbine that generates electricity. Different types of geothermal technologies exist, specifically dry, flash, and binary cycle. The choice of technology is typically dependent on the temperature of the geothermal source. While the fuel source is reliable and the technology has mainstream acceptance in the energy industry, geothermal power plants are highly dependent on location as they require a geothermal heat source to operate. The removal of steam and water from the ground can increase the risk of earthquakes and ground instability in the area. Due to its location and lack of geothermal resource, PEI is not a suitable location for a geothermal power plant.

Table 4-10 — Geothermal Advantages and Disadvantages

4.1.10. Fuel Cells

Fuel cells use chemical energy in fuels to produce electricity. A voltage difference between the cathode and anode of the cell is created through a chemical reaction between the fuel in the anode and oxygen in the cathode. This reaction generates heat, water, and a free electron. The free electron is then harnessed to

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generate an electrical current that can be converted into power. With hydrogen as the fuel source (a common fuel for fuel cells), the process is completely carbon free, making it a clean power source. Other fuels can be used to power the cell but will result in the generation of carbon dioxide. Electricity generation through chemistry rather than combustion allows fuel cells to achieve higher efficiencies compared with other power sources.

Currently, fuel cells have not been widely adopted as a source of power generation on a large scale and existing systems in operation are typically small in size. The technology is likely to gain wider acceptance in the future as global decarbonization commitments are pursued; however, the growth and implementation of fuel cells is significantly less than the growth of other renewable technologies, such as wind or solar PV. A challenge for hydrogen fuel cells is that the hydrogen has to be extracted from water via electrolysis or separated from carbon fossil fuels, which requires a significant amount of energy. For application to PEI, S&L considers that fuel cells might be considered for very small scale or demonstration projects on the island (perhaps to provide backup power to commercial or industrial buildings), but fuel cells are not well suited to provide substantial electrical generation capacity for the island.

Table 4-11 — Fuel Cell Advantages and Disadvantages

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4.2. FUELS CONSIDERED

A number of the different capacity resources generate electricity through the combustion of a fuel. Many of these resources are able to operate on a variety of different fuel types. The different fuel types explored for this analysis are listed below:

- Diesel
- **Biodiesel**
- Biomass
- Natural Gas and Compressed Natural Gas
- Hydrogen

Further discussion of the different fuels considered is provided in the following subsections.

4.2.1. Diesel

Diesel fuel is a commonly used fossil fuel that is produced from crude oil. As a fossil fuel, the burning of diesel fuel in thermal generators (i.e., engines or combustion turbines) releases carbon dioxide into the atmosphere. Ultra-low sulfur diesel fuel is currently used as the main fuel source for Maritime Electric's onisland backup generators. A benefit of diesel fuel is that there is a robust supply chain that makes it relatively easy to purchase. In addition, diesel fuel is easy to store for long periods of time (as opposed to many gaseous fuels like natural gas, hydrogen, etc.).

4.2.2. Biodiesel and Biomass

Biodiesel and biomass are both types of biofuel, which are produced from biological materials, rather than extracted from the earth like fossil fuels. Biofuels can be liquid, solid, or gas – biodiesel is a liquid fuel and biomass is a solid fuel. Although the combustion of biofuels releases carbon dioxide, when viewed from a life-cycle perspective, biofuels emit much lower greenhouse gas emissions than fossil fuels and may even result in zero net carbon emissions (discussed further below). Furthermore, biofuel-fired power generation facilities are dispatchable, meaning that they can be used at any time and at full capacity. The most applicable utility-scale applications of biofuels in PEI would be biodiesel and biomass. The government of Canada considers both biodiesel and biomass as renewable fuels²¹.

An advantage of burning biofuels instead of fossil fuels is the reduction in life cycle carbon emissions. Life cycle emissions consider additions and reductions of carbon across the full cycle of biofuel production and consumption. Additions include the emissions associated with the combustion of the biofuel for electricity

²¹https://www.nrcan.gc.ca/our-natural-resources/energy-sources-distribution/renewable-energy/about-renewableenergy/7295

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generation. Reductions occur as part of the earth's natural cycle associated with plant growth, as biomass growth removes carbon from the atmosphere through photosynthesis. Compared with traditional diesel, pure biodiesel (known as B100) reduces life-cycle carbon emissions by over 70%²². A 20% blend of biodiesel with traditional diesel (known as B20) would approximately reduce carbon emissions by 20% of this value, for a net reduction in carbon emissions of approximately 15% over traditional diesel. Solid biomass can also achieve at or close to carbon neutrality as long as the rate of re-planting/growth of the biomass keeps pace with the harvesting and consumption. The following figure provides an illustration of the carbon lifecycle differences between traditional fossil fuels and biofuels, such as biodiesel.

Figure 4-4 — Fossil Fuel vs. Biofuel Carbon Life Cycle

Biodiesel requires some special considerations when storing and utilizing as it can degrade various materials. Special attention must also be given to the fuel in the winter as it can gel if it is allowed to get too cold. Additionally, biodiesel degrades faster than traditional diesel – the typical shelf life for biodiesel that is properly stored is around 6 months.

²²[https://afdc.energy.gov/vehicles/diesels_emissions.html,](https://afdc.energy.gov/vehicles/diesels_emissions.html) https://www.anl.gov/argonne-scientific-publications/pub/140803

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In this report, the potential use of biodiesel is considered for both reciprocating engines (RICE) and combustion turbines (CTs). Both generators are capable of firing biodiesel, up to a 100% blend (e.g., B100). Many of today's commercially available RICE units are already fully compatible with both traditional diesel and biodiesel firing, without requiring modification to the engine itself; however, some minor modifications would be required to the BOP and storage systems. CTs require some modifications to the various CT components to allow for biodiesel firing, such as compatible fuel injection nozzles, combustors, etc. These modifications are in addition to modifications to the CT BOP and storage systems (similar to what would be required for a RICE power plant). Once these modifications are made, the CT unit is able to burn either traditional diesel or biodiesel. We estimate the cost of the CT equipment modifications would be modest, in the CAD \$2.5 million range, for a CT size in the 30 MW range.

Biomass is considered for biomass power plants. The type of biomass used in a power plant can vary from trees (typically wood pellets), grasses, or other sources. Equipment in a biomass power plant would need specialized design depending on the fuel type.

4.2.3. Natural Gas and Compressed Natural Gas

While natural gas is a common fuel utilized in the energy industry that releases much less carbon dioxide when burned than diesel fuel, the significant natural gas delivery infrastructure needed to support power generation (i.e., pipelines from the mainland, liquified natural gas delivery terminals, etc.) are not currently present on PEI. Furthermore, the costs associated with developing this infrastructure are too great to make economic sense for power plants that will be primarily utilized as backup generators. Compressed natural gas can be delivered by truck, but the amount of storage space required to utilize compressed natural gas at Maritime Electric's existing power plants (including required safe standoff distance) is too large for compressed natural gas to be utilized as a fuel source. For these reasons, both natural gas and compressed natural gas were not considered as fuel sources for this analysis.

4.2.4. Hydrogen

Hydrogen is not considered as a fuel source for this analysis for a number of different reasons. Currently, there are not any commercially available RICE or CT resources that can operate on 100% hydrogen. The capability for RICE and CT generators to burn 100% hydrogen is estimated to be 5-10 years away based on our discussions with RICE and CT manufacturers. This section provides an overview of considerations associated with hydrogen's use in generators for informational purposes.

Hydrogen is an abundant element that can be stored and combusted to produce energy without carbon emissions. Currently, it has limited use in electricity generation; however, its high energy content per unit of weight and its near-zero emissions make it viable for greater use in the future. Challenges to widespread hydrogen usage include the need to separate elemental hydrogen from the compounds in which it naturally

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exists and the need for advanced storage and delivery methods. If these challenges can be effectively mitigated, hydrogen will see more significant usage for electricity generation in fuel cell applications or in conventional power plants.

Separation of elemental hydrogen from naturally occurring compounds like water is a process that requires energy. The predominant method for hydrogen production is steam reforming of natural gas, in which natural gas chemically reacts with water and heat to produce hydrogen and carbon dioxide. There are various other production methods, as shown in the following graphic.

At roughly CAD \$1.5 to \$3 per kilogram of hydrogen, gasification and steam reforming are currently the most economical ways to produce hydrogen, as illustrated by the following graphic. However, the projected cost of electrolysis is expected to decrease by 50% by 2030, bringing it more in line with the currently predominant and cost-effective methods²³.

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²³ PEI has experience with a hydrogen electrolysis project through the Hydrogen Village project that was active in the 2005-2010 timeframe. It was determined at that time that electrolysis of hydrogen using wind power was uneconomic so the technology was not pursued.

There is significant uncertainty as to the future pricing of hydrogen as a fuel source due to the fact that it is unknown how much both demand and supply might increase. Once elemental hydrogen is produced, it can be used in electricity generation applications in a variety of ways, including direct integration with an existing power plant. Introducing hydrogen as a fuel to an existing power plant requires a transportation and delivery method, which presents unique challenges due to hydrogen's extremely low boiling point temperature. Methods for hydrogen transportation are summarized below:

- **Pipeline**: Transporting gaseous hydrogen via existing pipelines is a low-cost option for delivering large volumes of hydrogen. The high initial capital costs of new pipeline construction constitute a major barrier to expanding hydrogen pipeline delivery infrastructure.
- **Truck – Liquid**: Hydrogen has the lowest boiling point of any element, requiring temperatures below -253°C for liquid phase. As a result, the maximum range for trucking is approximately 4,000 km because over the journey time the cryogenic hydrogen heats up, causing the pressure in the container to rise. Trucking liquid hydrogen is more economical than gaseous hydrogen trucking due to volume contained in truck.
- **Truck – Gas**: This method primarily is used for low / intermittent demand and existing power plant usage (for large generator cooling). Gaseous hydrogen is compressed to pressures of 180 bar (~2,600 psi gauge) or higher. Tube trailers pressure limitations can limit the amount of hydrogen that can be transported. Steel tube trailers are most common.

Once hydrogen is delivered to a site, it can be integrated into a power plant's primary fuel source. Most existing high-pressure transmission pipelines can accept up to 15% hydrogen blending (by volume) with their current material composition. This 15% hydrogen mixture can result in a 5% reduction in carbon dioxide (by mass) in combustion byproducts. Currently, gas turbine and engine manufacturers do not have commercially available generators that can burn 100% hydrogen; however, those are expected to be

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available within 5 years. OEMs have also indicated that many older, operating combustion turbines can accept some percentage of hydrogen mixed with natural gas.

Hydrogen integration is not without potential challenges and engineering considerations. For example, hydrogen is a smaller molecule than methane (a common fuel source), which means that gaskets and pipeline connections must be checked to eliminate leakage. Integration of hydrogen with an existing power plant can also cause material embrittlement, which can diminish load-bearing capacity and lead to cracking failures below the anticipated yield strength of susceptible materials. Hydrogen embrittlement affects base materials differently – it is problematic for high-strength steel but has no effect on austenitic stainless steel. Therefore, evaluation of welds must be performed prior to the introduction of hydrogen fuel due to welds' varying levels of hardness and yield strength.

Hydrogen usage in power plants also requires additional safety considerations. Hydrogen is the smallest molecule, enabling it to leak out of non-welded systems. It is also a colorless and odorless gas, causing leaks to be more difficult to detect. Furthermore, hydrogen is highly flammable and explosive even in low concentrations, and its temperature increases with pressure drops (in contrast to most other gases) due to the Joule–Thomson effect, increasing the risk of self-ignition during uncontrolled expansion. It therefore requires increased National Fire Protection Association classification and more stringent safety measures, which may require changes to existing electrical equipment and devices.

If Maritime Electric were to install a new generator, we do not recommend hydrogen be pursued as the primary fuel source at this point in time. Currently, engines or CTs that can combust 100% hydrogen are not yet commercially available; therefore, Maritime Electric would have to mix the hydrogen with natural gas. At present, there is not an established natural gas pipeline network on PEI; thus, Maritime Electric would also have to import and store natural gas on the island. Separately, since electricity purchased from NBEM is more economical than energy generated by the on-island CTs and engines, Maritime Electric's generators rarely operate. As a result, an investment into developing hydrogen storage infrastructure and supply chain would likely not result in a significant reduction in Maritime Electric's carbon emissions.

5 . C A P A C I T Y R E S O U R C E A N A L Y S I S

The different capacity resources considered in this report are analyzed in this section. The analysis first considers a high-level initial screening of the different technologies to rule out technologies that either do not have significant deployment in the energy industry or are clearly not well suited to be developed on PEI. Capacity resource technologies that pass the initial screening are further analyzed from a more in-depth perspective. This in-depth analysis includes a combination of technical, financial, and sustainability considerations. From the financial perspective, S&L has developed cost estimates of the short-listed capacity resource technologies based on our recent experience providing development oversight for projects of the respective technology. Cost estimates have been adjusted to account for PEI-specific considerations, including the island's location, construction labor estimates, taxes, etc.

5.1. INITIAL SCREENING OF TECHNOLOGIES

An initial screening process was performed to assess the high-level viability of the different capacity resource technologies considered in this report. This screening primarily looked at two different criteria:

- 1) **Significant Energy Industry Deployment**: This criterion is utilized to rule out technologies for which there would be a risk to Maritime Electric for being an early adopter of the technology. As an early adopter of a technology, Maritime Electric would potentially expose their customers to the financial risk associated with technology underperformance, high repair costs, design flaws, delays achieving commercial operation, and other associated items. As such, capacity resource technologies that do not have wide deployment in the energy industry are ruled out in the initial technology screening.
- 2) **Sufficient Renewable Resource**: This criterion is utilized to rule out renewable technologies for which there is not a sufficient renewable resource in PEI to support electricity generation.

The following table presents the results of the initial screening, including a set of notes regarding the screening decision. In order for the technologies to pass the initial screening, both criteria 1 and 2 must be met. Capacity resource technologies that pass the initial screening are considered as part of a more detailed analysis later in the report.

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5.2. CANDIDATES FOR SECONDARY SCREENING

The capacity resource technologies that passed the initial screening are listed below:

- Onshore wind power
- Offshore wind power
- Solar PV (utility scale)
- Rooftop solar PV
- Energy storage (BESS, Li-Ion)
- Reciprocating internal combustion engine
- Combustion turbine aeroderivative
- Biomass power plant

The following subsections provide a detailed analysis and cost comparison of the different technologies. In addition, a discussion of how well the different technologies are able to help Maritime Electric costeffectively meet its most important needs is also provided. These criteria are summarized below and also discussed in Section [2:](#page-330-1)

- 1) **Resource Contributions Towards Maritime Electric's Energy and Capacity Obligations:** Maritime Electric must meet both a) energy obligations and b) regional capacity obligations. Energy obligations are those associated with Maritime Electric meeting the system's electrical load every hour of the day. Maritime Electric's capacity obligations are the share of capacity that Maritime Electric must have either installed on-island or purchased from either on PEI or on the mainland such that the NPCC reliability standards for the Maritimes Area (which consists of PEI, New Brunswick, Nova Scotia, and northern Maine) are met.
- 2) **Resource Contributions When PEI is Electrically Disconnected from Mainland:** A scenario where PEI is electrically disconnected from the mainland is considered an emergency scenario with historical precedence. During this time, assets located on PEI alone must be able to meet load and stabilize the electrical system (electricity to stabilize the system is usually purchased from the mainland).
- 3) **Resource Contributions Towards Maritime Electric's Sustainability Targets:** Maritime Electric has established a greenhouse gas emissions reduction target to reduce emissions by 55% by 2030 (from 2019 levels). Preference should be given to resources that will help Maritime Electric achieve this target.

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5.2.1. Wind Power

5.2.1.1. Onshore Wind Power

As discussed previously, consistent and strong wind speeds are one of PEI's best resources from a power generation perspective. The most recently installed wind farms on PEI approach a 50% capacity factor on an annual basis, which is among the highest in the energy industry for onshore wind farms. S&L developed a cost buildup for a 50 MW onshore wind power plant, which is provided in [Appendix A.](#page-418-0) A summary of the costs is provided in the following table.

Table 5-2 — Onshore Wind Estimated Capital Costs, 50 MW

Based on the high wind resource on PEI and the costs for wind power plants in comparison to other technologies, wind power is a cost-effective source of renewable generation for Maritime Electric. A separate cost buildup of operations and maintenance (O&M) costs is provided in [Appendix B.](#page-425-0)

Resource Contributions Towards Maritime Electric's Energy and Capacity Obligations: Due to PEI's strong wind resource, the continued development of wind power plants on PEI is one of the most effective ways that Maritime Electric can meet its energy obligations in a carbon-free and cost-effective manner. The high capacity factors of the new wind power plants equate to large amounts of energy that are generated, providing carbon-free power to the community and offsetting imports from NBEM.

The intermittent nature of the wind means that wind power plants cannot contribute much towards Maritime Electric's regional capacity obligations. The reason for this is because Maritime Electric is required to calculate the capacity contributions of resources using a methodology that appropriately accounts for both the resource's intermittency and when the resource generates with respect to when system load is highest. The amount of wind capacity that Maritime Electric can count towards their capacity obligations is determined based on the wind power plant's effective load carrying capability (ELCC), which is discussed further in [Appendix C.](#page-432-0) The ELCC for the 92.5 MW of wind generation in Maritime Electric's portfolio today is 23%, meaning that only 21 MW of the 92.5 MW of wind installed count towards Maritime Electric's capacity obligations (92.5 MW x 23% = 21 MW). The ELCC of a resource falls as more of that resource is installed (see [Appendix C](#page-432-0) for further discussion). As a result, if Maritime Electric had another 70 MW of wind generation in their portfolio, for 162.5 MW of wind generation total, the ELCC for the portfolio is estimated to only be 17%. As a result, the resulting amount of wind capacity that Maritime Electric could

count towards their capacity obligations would be 28 MW (162.5 MW x 17% = 28 MW), which is only a 7 MW increase in effective capacity over the current portfolio today.

Resource Contributions When PEI is Electrically Disconnected from Mainland: Given their intermittent nature, wind power plants are not a reliable source of electricity during a situation when PEI is electrically disconnected from the mainland. In the event that the wind power plants are generating electricity while PEI is disconnected, the on-island dispatchable generators will need to balance the wind generation so that there is not an over- or under-supply of electricity in the system (without proper balancing, the system can collapse) 24 . Typically, the balancing needs are met by NBEM using mainland-based generation, through the ties of PEI to the mainland. PEI has significantly more wind capacity installed onisland compared to installed dispatchable generating capacity, meaning that only a fraction of the wind capacity can be utilized when PEI is disconnected from the mainland, without risking the wind generation overwhelming the on-island dispatchable generators' balancing capabilities. During a disconnection of PEI, Maritime Electric estimates that only 37% of all the installed on-island wind nameplate capacity on PEI²⁵ could be utilized when all the on-island dispatchable generators are available. This value falls to 0% in the event the Charlottetown CT3 is unavailable.

Resource Contributions Towards Maritime Electric's Sustainability Targets: Wind energy is a great source of renewable carbon-free energy that would assist Maritime Electric in meeting their sustainability targets. Additional on-island wind generation will provide additional energy for Maritime Electric to serve load, resulting in less energy purchased from the mainland and therefore lower carbon emissions. Maritime Electric already has under contract a total of 92.5 MW of wind capacity that it utilizes to serve load, and an additional 70 MW of wind generation is planned. We estimate that the additional 70 MW of wind generation will decrease carbon emissions by approximately 14% on a tonnes CO₂e basis (see the "No BESS" column of [Table 3-5\)](#page-363-0).

²⁴ When generators are helping to "balance" the system, they must be operated at at less than their maximum output, which allows them to be able to absorb the fluctuations from load or intermittent generation (such as wind or solar) without causing system instability. RICE and CTs can operate as balancing generation as their output is controllable. Wind and solar are not dispatchable generators and thus cannot provide balancing services, since their output is generally not controllable. For reference, energy storage systems can help to balance the system; however, the amount an energy storage system can help balance the system when PEI is disconnected from the mainland may be limited since it depends on the state of charge of the BESS at the moment that disconnection occurs, the length of the disconnection, and whether/how much the wind power plants are generating electricity. This is discussed further in Sectio[n 5.2.3.](#page-394-0)

²⁵ This is based on energy from all wind generation located on-island, which includes facilities supplying both on- and off-island customers.

5.2.1.2. Offshore Wind Power

Offshore wind power plants generate energy in the same manner as onshore wind power plants, but they utilize larger turbines that are erected in the ocean and can generate more electricity with less intermittency (due to the more consistent winds over the ocean). While offshore wind power plants typically have a higher capacity factor than onshore wind power plants, PEI's onshore wind resource is very strong both in terms of wind speed and frequency. As a result, the expected improvement in capacity factor for offshore turbines near PEI versus PEI's onshore turbines will likely be modest.

From a capital cost perspective, offshore wind power plants are significantly more expensive than onshore wind power plants due to the challenges associated with developing the power plants and their associated infrastructure in the ocean. Based on information we maintain in our internal project databases, we estimate that an offshore wind power plant would cost 3x to 4x more than an onshore wind power plant on a dollar per kW basis (\$6,000/kW - \$8,000/kW), or potentially more. Additionally, offshore wind power plants are typically hundreds to thousands of MWs in size, which allows them to capture economies of scale cost efficiencies. Given the relatively small amount of generation that Maritime Electric has to serve, an offshore wind power plant likely does not make sense for Maritime Electric's small system.

In summary, given the strong onshore wind resource on PEI and the significantly lower costs associated with onshore wind as compared to offshore wind, an offshore wind power plant is not a recommended resource solution for Maritime Electric.

5.2.2. Solar PV

5.2.2.1. Utility-Scale Solar PV

While PEI's northern latitude and climate are not ideal for solar PV generation, the solar resource on PEI is still high enough to provide a limited amount of energy to the island. As shown in [Appendix D](#page-435-0) of this report, the expected capacity factor for a solar PV power plant on PEI is approximately 19.9% for a bifacial, fixedtilt configuration. The following table presents our expected costs for 50 MW of solar PV built on PEI (5x10 MW power plants, bifacial, fixed-tilt configuration). The costs are based on our project experience within Canada and the northeastern United States. It is important to note that the costs in the table below are marginally higher than those expected for an onshore wind power plant on PEI with a similar nameplate capacity; however, the expected annual generation produced by the solar PV power plant is less than half of that expected for an onshore wind power plant. A separate cost buildup of O&M costs is provided in [Appendix B.](#page-425-0)

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Table 5-3 — Utility Scale Solar PV Estimated Capital Costs, 50 MW (5x10 MW)

Resource Contributions Towards Maritime Electric's Energy and Capacity Obligations: A solar PV power plant would help Maritime Electric meet its energy obligations and purchase less energy from NBEM. While the solar resource on PEI is much lower than the wind resource on PEI, the addition of solar energy to Maritime Electric's generation portfolio would provide diversification since the solar and the wind generation profiles would not be perfectly correlated. In general, a more diverse generation portfolio is beneficial since different resources can complement one another – for example, solar PV can still generate electricity during the day when the wind might not be blowing. However, given the fact that the expected capacity factor of solar PV is much lower than that of an onshore wind power plant for a similar dollar per kW cost point, PEI and Maritime Electric would have to determine if those diversification benefits are high enough to justify investment in solar PV versus simply continuing to invest in more onshore wind power plants, which provide a much higher amount of MWhs generated per dollar invested.

Since the solar PV generates only during the daytime hours, it is unable to supply energy in winter evening periods when Maritime Electric typically reaches its annual peak load. As a result, the ELCC of solar PV is zero, meaning solar PV would not be able to contribute to Maritime Electric's regional capacity obligations.

S&L recommends that continued investment into wind power plants on PEI be pursued as the first priority, with investment into utility-scale solar PV pursued as a close second priority.

Resource Contributions When PEI is Electrically Disconnected from Mainland: Similar to wind, solar PV is limited in the amount of energy that it can contribute in the event of a disconnection of PEI from the mainland. The intermittent nature of the solar generation will require balancing from the on-island dispatchable generators. Additionally, solar PV will not generate energy at night and generation will be reduced when there is cloud cover, further limiting the amount of electricity the resource can provide during a disconnection event. As a result, solar PV power plants are not a reliable resource for Maritime Electric in the event that PEI is disconnected from the mainland.

Resource Contributions Towards Maritime Electric's Sustainability Targets: As a renewable resource, solar PV will support Maritime Electric's efforts towards reducing carbon emissions. Any generation from a solar PV power plant will equate to less energy needed to be purchased from mainland power plants (some of which emit carbon) through the contract with NBEM.

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5.2.2.2. Rooftop Solar PV

Small-scale solar PV is typically installed by a customer on the roof of their building (in a small number of cases it is installed as a standalone unit on a customer's property). Customers that install rooftop solar are still connected to the grid, allowing them the ability to buy electricity when their rooftop solar PV production may not be high enough to fully meet their electrical load. Likewise, the connection of the rooftop solar PV system to the grid allows the customer to sell any excess generation back to Maritime Electric. Typically, rooftop solar PV systems are sized to fully offset the home's/business' electrical consumption. The net effect of rooftop solar PV growth on PEI is that it decreases the amount of electricity Maritime Electric needs to provide to their customers, which equates to less electricity purchases from NBEM and thus lower carbon emissions.

S&L has calculated the estimated cost for a 10-kW rooftop solar PV system, including the total cost per kW installed. A summary of those costs is provided in the table below, with a more detailed buildup of costs provided in [Appendix A.](#page-418-0)

Table 5-4 — Rooftop Solar PV Estimated Capital Costs (10 kW)

While less cost effective than utility scale solar PV, rooftop solar PV can be economical for customers, when supported with governmental grants and incentives, from the perspective that it is a long-term investment. Additionally, there are intrinsic benefits for individuals that install rooftop PV systems on their homes/businesses associated with reducing one's carbon footprint.

For much of North America, including PEI, utilities compensate customers that install rooftop solar through a mechanism called net metering. In a net metering arrangement, any electricity that a homeowner / business generates is credited on their electricity bill, often at a fixed electricity rate. If the solar system produces excess electricity beyond the homeowner / business' load, the excess generation is injected back into the electric system and credited on a future electricity bill. There are some drawbacks associated with net metering that are worth noting. First, the value of electricity varies by the time of day, based on system supply and demand. As such, crediting a fixed electricity rate through a net metering program can mis-align 1) the actual value the solar energy provides to the electrical system to 2) what the utility pays the customer for the solar energy. Additionally, electricity rates pay for other services beyond simply the cost to generate the electricity, including costs to maintain/improve the transmission and distribution system, costs for the utility to meet regional capacity obligations, etc. A net metering program can unfairly shift the costs for these

services away from customers that have net-metered solar systems onto customers that do not have solar systems. It is generally found that the societal benefits of rooftop solar outweigh these costs; however, it might be beneficial for Maritime Electric to explore if there are alternative payment mechanisms that can be employed to more equitably share the costs associated with rooftop solar.

Resource Contributions Towards Maritime Electric's Energy and Capacity Obligations: The continued growth of rooftop solar PV on PEI contributes to Maritime Electric's ability to meet energy obligations by reducing system electrical load throughout the daytime. Since rooftop solar PV generation does not occur in the evening (when system load is highest), total system load in the evening is likely to be unchanged. As a result, Maritime Electric's capacity obligations are not likely to fall as more rooftop solar PV is adopted.

Resource Contributions When PEI is Electrically Disconnected from Mainland: With widespread adoption of rooftop solar PV on PEI, the resource could provide a positive systemwide impact during times when PEI is disconnected from the mainland via system load reductions in the daytime. Currently, there is not enough rooftop solar PV installed on PEI to make an appreciable system-wide difference. Additionally, during the night or when there is significant cloud cover, rooftop solar PV will not be able to contribute to the system. Thus, rooftop solar PV is not currently a reliable resource that allows Maritime Electric to better navigate a disconnection to the mainland.

Resource Contributions Towards Maritime Electric's Sustainability Targets: As a renewable resource, rooftop solar PV will support Maritime Electric's efforts towards reducing carbon emissions. Any generation from a rooftop solar PV system will equate to less electricity that Maritime Electric needs to purchase from NBEM.

5.2.3. Lithium-Ion Energy Storage

Lithium-ion energy storage is the most common BESS in the energy industry. BESS is not a generation resource, it is a storage resource that can transfer energy from one time to another; however, many of the use cases for BESS overlap with those of generators. In addition, the unique technical characteristics of BESS allow it to be used in ways many generator types are unable. For example, BESS' ability to inject energy instantaneously makes it well suited to perform energy arbitrage through an energy marketplace (i.e., charging when energy prices are low and discharging when energy prices are high), ancillary services (i.e., voltage support, frequency regulations, etc.), and other similar use cases requiring fast response. This section highlights how BESS can contribute to the three specific use cases that are most critical to Maritime Electric at this point in time.

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S&L has provided technical and project developmental guidance to numerous BESS projects. In addition, we have helped run numerous requests for proposals (RFPs) on behalf of utilities for generation and storage projects. As such, we have a detailed cost database of current BESS project pricing. The following table provides our estimate of the capital cost summary for a 50 MW BESS project developed on PEI for three different storage durations: 1 hour, 2 hours, and 4 hours. A more detailed cost buildup of storage costs is provided in [Appendix A,](#page-418-0) including 8 hour and 24 hour duration projects.

BESS Size	Cost Parameter	Estimated Cost (\$ CAD)
50 MW, 50 MWh (1-hr storage)	Total Capital Costs	\$47,966,000
	Total Capital Costs (\$/kW)	\$959
	Total Capital Costs (\$/kWh)	\$959
50 MW, 100 MWh (2-hr storage)	Total Capital Costs	\$78,228,000
	Total Capital Costs (\$/kW)	\$1,565
	Total Capital Costs (\$/kWh)	\$782
50 MW, 200 MWh (4-hr storage)	Total Capital Costs	\$133,523,000
	Total Capital Costs (\$/kW)	\$2,670
	Total Capital Costs (\$/kWh)	\$668

Table 5-5 — Lithium-Ion Energy Storage (50 MW) Estimated Capital Costs

It is important to note that while BESS project pricing has fallen continuously over the last decade, prices are still relatively more expensive than some similarly sized generators that can be used for similar use cases, specifically engines and combustion turbines. In recent years, supply chain constraints associated with the demand for electronics and lithium have contributed to BESS prices not being able to achieve full price parity with these generator types.

For comparison, the O&M costs for a new 50 MW, 4-hour, BESS project are estimated to be similar to the O&M costs for an equally-sized new RICE unit that would serve primarily as a backup generator for Maritime Electric (see the end of [Appendix B](#page-425-0) for a detailed 20-year comparison of O&M costs for both BESS and RICE). Considering that a BESS project would likely be utilized more frequently on a day-to-day basis than a backup RICE generator, the BESS O&M costs are considered to be relatively inexpensive. However, due to the performance degradation of batteries with usage, Maritime Electric would have to augment the BESS project (i.e., add more battery cells) multiple times over the project's service life in order to keep the BESS at a consistent performance level. The costs of augmentations are sizable – augmentations are estimated to cost a total of nearly CAD \$20 million (2022 \$'s) over a 20-year BESS project life (see the table at the end of [Appendix B](#page-425-0) for additional details) for a 50 MW, 4-hour project. It is important to note that a BESS
project does not have to be augmented; however, a typical non-augmented project can be expected to degrade approximately 25% to 30% over a 20-year lifespan.

Resource Contributions Towards Maritime Electric's Energy and Capacity Obligations: A BESS project will have a limited ability to help Maritime Electric meet its energy obligations. This is due to the fact that as a storage resource, a BESS can only store and re-inject already generated electricity. As discussed in detail in Section [3.2.1,](#page-359-0) in the event that generation from the wind power plants on PEI (and any future solar power plants) plus the nuclear generation from Point Lepreau results in an excess of generation above system load, Maritime Electric has to sell the excess generation to the mainland. During these times, a BESS project would be able to store some or all of this excess generation and re-inject it later, which would help Maritime Electric better meet its energy obligations. Currently, the vast majority of the electricity generated by the wind power plants on PEI is used immediately to serve load – times when there is excess generation are extremely rare. With additional wind and solar projects planned for PEI, specifically the additional 70 MW of wind planned to be online in the coming years, the amount of times when there will be excess generation is likely to increase, but not to forecasted levels that justify a significant investment in BESS. As such, a BESS project is unlikely to appreciably help Maritime Electric meet its energy obligations in the near to intermediate future.

From the perspective of capacity obligations, a significant portion of a BESS' nameplate capacity would be able to be used by Maritime Electric to meet its regional capacity obligations. The exact amount would need to be quantified and would vary based on the technical characteristics of the BESS project, but we expect that it is likely to be similar to the BESS' nameplate capacity. As such, a BESS project is an excellent resource to help Maritime Electric meet its regional capacity obligations if the BESS is used primarily for capacity storage.

Resource Contributions When PEI is Electrically Disconnected from Mainland: During a disconnection event, a BESS could be able to provide some benefit to the island, but the amount is likely to be limited. If PEI is disconnected from the mainland, Maritime Electric does not currently have enough generation to meet system load. As a result, rolling blackouts are expected (discussed further in Section [2.2.2\)](#page-340-0). The addition of BESS to PEI could help Maritime Electric to better balance the wind generation intermittency during a disconnection from the mainland, which would in turn allow Maritime Electric to utilize more of PEI's wind capacity to serve system load. This would likely equate to less severe rolling blackouts.

The level at which BESS would be able to help the system during a disconnection of PEI from the mainland depends on a number of factors, including the state of charge of the BESS at the moment the disconnection occurs, the length of the disconnection, and whether / how much the wind power plants are generating electricity. At best, a BESS system could be very helpful for Maritime Electric during a disconnection from the mainland; however, if the wind power plants are not generating electricity during the time when PEI is

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disconnected from the mainland, then the amount of support a BESS could provide is limited to both its state of charge and duration. As a result, there is significant uncertainty around how much a BESS project would be able to support the system during a disconnection from the mainland, and thus a BESS project is not considered to be a reliable resource for this specific use case.

Resource Contributions Towards Maritime Electric's Sustainability Targets: In the event that generation from the wind power plants on PEI (and any future solar power plants) plus generation from Point Lepreau results in an excess of generation above system load, Maritime Electric has to sell this excess generation to the mainland. During these times, a BESS project would be able to store some or all of the excess generation and re-inject it on PEI later, which would allow Maritime Electric to purchase less total energy from NBEM and thus reduce carbon emissions. As shown in Section [3.2.1,](#page-359-0) there is currently not enough wind capacity installed on PEI today, or additional wind capacity planned in the intermediate future (specifically the additional 70 MW of wind planned in the coming years), to result in a large number of times when there will be excess generation above load. As a result, the installation of a BESS is not expected to appreciably improve Maritime Electric's ability to meet sustainability targets in the near future.

As more wind is installed on PEI beyond the 70 MW planned for the coming years, there will be more times when there is excess generation above load. As a result, a BESS would be able to better help Maritime Electric meet sustainability goals; however, at that point in time we recommend that a comparative assessment be performed to assess various carbon-reduction solutions, including a BESS, to determine which solutions would provide the highest carbon-reduction benefits on a per dollar invested perspective.

5.2.4. Reciprocating Internal Combustion Engine

A RICE is a type of dispatchable generator that can provide both energy and capacity. A RICE is a common resource in the energy industry due to its modularity, flexibility (ability to start/stop and ramp quickly), and cost-effectiveness. Additionally, a RICE can operate on a variety of different fuels, including renewable fuels such as biodiesel. While commercially-available RICE offerings cannot yet operate on 100% hydrogen, engine manufacturers expect to have this capability in the coming years. For the purposes of Maritime Electric, the ability for a RICE power plant to operate on renewable fuels would help to reduce the risk that a new RICE power plant might become a stranded asset should the Canadian government introduce stricter policies regarding allowable fuels that can be used for power generation. Maritime Electric would utilize a new RICE power plant primarily for backup and emergency generation.

The following table provides a summary of the expected capital costs for new RICE power plant, specifically one operating on diesel fuel and another operating on biodiesel fuel. A more detailed cost buildup of RICE costs is provided in [Appendix A.](#page-418-0) For reference, two differently designed RICE power plants are not needed to be able to operate on either diesel fuel or biofuel. Engines are very flexible in terms of fuel type; thus, the

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same power plant could switch from burning diesel fuel to biodiesel fuel without modification. The difference in per kW cost are primarily because the operation of RICE power plant on biodiesel results in some derating in output versus operation on traditional diesel fuel. A separate cost buildup of O&M costs is provided in [Appendix B.](#page-425-0)

Notes

1) Wärtsilä 20V32 engines are assumed as representative engine types. Other manufacturers make similar engines to this model.

2) While the engine type and size are consistent with both diesel and biodiesel fuel, the use of biodiesel results in some derating of engine output versus diesel fuel; thus, the capital costs on a \$/kW basis are different.

Resource Contributions Towards Maritime Electric's Energy and Capacity Obligations: From the perspective of energy obligations, Maritime Electric would use a RICE primarily as a back-up generator and dispatch only when enough electricity could not be procured from the mainland, or during emergencies. As such, it is not expected that a RICE will be utilized to meet Maritime Electric's energy obligations; however, given that a RICE is a dispatchable generator, it could be utilized to meet Maritime Electric's energy obligations if called upon.

A RICE would provide capacity to help Maritime Electric meet its regional capacity obligations. If installed, close to the RICE's nameplate capacity could be utilized to meet Maritime Electric's capacity obligations. A RICE power plant is an excellent source of generating capacity.

Resource Contributions When PEI is Electrically Disconnected from Mainland: A RICE would be a very beneficial resource for Maritime Electric in terms of being able to provide generation to the grid in the event of an electrical disconnection of PEI from the mainland. The addition of a RICE to PEI would provide Maritime Electric more dispatchable capacity to both serve load and also to balance the wind generation intermittency during a disconnection, which would in turn allow Maritime Electric to utilize more of PEI's wind capacity without risking an imbalance of generation and load. As a result, a RICE would reduce the severity of a rolling blackout situation if PEI were disconnected from the mainland.

Resource Contributions Towards Maritime Electric's Sustainability Targets: As primarily a backup generator, an additional RICE would have a small impact on Maritime Electric's overall carbon emissions (this is further illustrated in [Table](#page-357-0) 3-3); however, a RICE does produce carbon emissions when burning fuel.

The amount of carbon emissions the RICE generates is dependent on the type of fuel the RICE burns. Based on PEI's existing fuel delivery infrastructure, the two fuels that are the most realistic for use by Maritime Electric in a RICE are diesel and biodiesel fuel. As a fossil fuel, traditional diesel produces carbon emissions when burned. Biodiesel combustion also produces carbon emissions; however, the lifecycle emissions (considering net emissions from the entire production process of the fuel) of biodiesel are much lower than typical diesel fuel. In fact, the lifecycle emissions are low enough that the government of Canada considers biodiesel a renewable fuel²⁶.

5.2.5. Combustion Turbine – Aeroderivative

Aeroderivative CTs have many similarities to RICE in terms of the benefits they can provide to an electrical system. CTs are a dispatchable generating resources that are flexible (i.e., they can start/stop and ramp quickly), cost effective, and very common in the energy industry. CTs are also flexible in that they can operate on a variety of different fuels, including both diesel and biodiesel fuels. For the purposes of Maritime Electric, the fuel flexibility of CTs helps to reduce the risk that they might become a stranded asset if the Canadian government introduced stricter restrictions on what fuels could be used in power plants. Unlike RICE, aeroderivative CTs require some minor modifications and associated capital investment to be able operate on biodiesel (estimated at around CAD \$2.5 million for a 30 MW CT). Maritime Electric would primarily utilize a CT to provide backup generation and also generation during emergencies.

The following table provides a summary of the expected capital costs for a new aeroderivative CT power plant, specifically ones operating on diesel fuel and another operating on biodiesel fuel. A more detailed cost buildup of CT costs is provided in Appendix [A.](#page-418-0) A separate cost buildup of O&M costs is provided in [Appendix B.](#page-425-0)

Notes

1) General Electric LM2500+ are assumed as representative CT types. Other manufacturers make similar CTs to this model.

²⁾ While the CT type and size are consistent with both diesel and biodiesel fuel, the use of biodiesel necessitates additional capital costs to modify some CT combustion / fuel delivery equipment

²⁶ https://www.nrcan.gc.ca/energy-efficiency/transportation-alternative-fuels/alternative-fuels/biofuels/biodiesel/3509

Resource Contributions Towards Maritime Electric's Energy and Capacity Obligations: An aeroderivative CT power plant would primarily be utilized by Maritime Electric as a backup generator. As a result, a new CT power plant would likely not contribute appreciably towards helping Maritime Electric meet its energy obligations; however, given that it is a dispatchable generator, it could generate energy if called upon.

A CT would help Maritime Electric meet its regional capacity obligations. If installed, close to the CT's nameplate capacity could be utilized to meet Maritime Electric's capacity obligations. A CT power plant is an excellent source of generating capacity.

Resource Contributions When PEI is Electrically Disconnected from Mainland: Similar to a RICE, a CT power plant would be a very beneficial resource for Maritime Electric in terms of being able to provide generation to the grid in the event of an electrical disconnection of PEI from the mainland. The addition of a CT to PEI would provide Maritime Electric more dispatchable capacity to both serve load and also to balance the wind generation intermittency during a disconnection, which would in turn allow Maritime Electric to utilize more of PEI's wind capacity without risking an imbalance of generation and load. As a result, a CT power plant would reduce the severity of a rolling blackout situation if PEI were disconnected from the mainland.

Resource Contributions Towards Maritime Electric's Sustainability Targets: Similar to a RICE power plant, a CT power plant would primarily be utilized to provide system backup generating capacity and support for the system during an emergency. As a result, a CT power plant would have a small impact on Maritime Electric's overall carbon emissions (this is further illustrated in [Table](#page-357-0) 3-3); however, a CT does produce carbon emissions when burning fuel. The amount of carbon emissions generated by a CT power plant is dependent on the type of fuel burned. As a fossil fuel, regular diesel produces carbon emissions when burned. Biodiesel combustion also produces carbon emissions; however, the lifecycle emissions (considering net emissions from the entire production process of the fuel) of biodiesel are much lower than typical diesel fuel (the Canadian government considers biodiesel to be a renewable fuel).

5.2.6. Biomass Power Plant

Biomass power plants are both dispatchable and renewable. Biomass power plants burn biomass fuel to create steam, which drives a steam turbine to produce electricity. Biomass power plants are less flexible than other generating technologies in that a biomass power plant will take longer to start/ramp to different generation levels than a RICE or CT power plant, or BESS project. In addition, biomass power plants are generally more expensive to build than other generating technologies due to the complexity associated with the different systems/equipment (i.e., steam generation, feedwater, steam piping, steam turbine, etc.). Due

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to its relative inflexibility and high capital cost, it generally makes more sense to operate a biomass power plant as a baseload generator rather than as a backup generator.

An estimate of capital costs to build a 50 MW biomass power plant is provided below. These costs are developed based on our experience with biomass, boilers, steam turbines, and other related equipment.

Table 5-8 — Biomass Power Plant Estimated Capital Costs, 50 MW

Cost Parameter	Estimated Cost (\$ CAD)			
Total Capital Costs	\$292,803,000			
Total Capital Costs (\$/kW)	\$5.856			

Resource Contributions Towards Maritime Electric's Energy and Capacity Obligations: A biomass power plant can help Maritime Electric meet both of its energy and capacity obligations. In addition, as a dispatchable generator, Maritime Electric would have control over the dispatch of the power plant. Due to its operational inflexibility, a biomass power plant would likely have to serve as a baseload generator for Maritime Electric. From a cost perspective, while a biomass power plant is also a renewable resource, it is much more expensive than other renewable resources such as onshore wind and solar PV.

Resource Contributions When PEI is Electrically Disconnected from Mainland: As a dispatchable resource, a biomass power plant would be well suited to provide power during an event where PEI is electrically disconnected from the mainland. While a biomass power plant could provide generation, it would be less effective at providing renewable/load balancing support than other generator technologies (i.e., RICE or CTs) or BESS projects. This is due to the fact that a biomass power plant is not as flexible as other technologies in terms of its ability to quickly ramp to different generation levels.

Resource Contributions Towards Maritime Electric's Sustainability Targets: As a renewable generator, a biomass plant would help contribute towards Maritime Electric meeting their sustainability targets. The Canadian government recognizes biomass plants as renewable resources if the complete fuel cycle (i.e., growth of the biomass through combustion in the generators) is carbon net zero. When burned, biomass fuel does emit carbon, but this carbon is considered to be consumed during the process of growing more biomass. One challenge with a biomass power plant is that a significant amount of land would be required to grow the biomass required to fuel the power plant, and to reduce transportation of fuel, having the biomass near the facility is beneficial. An adequate source of biomass on PEI would have to be identified, or a fuel sourcing analysis would be required to see if it can be sourced from the nearby mainland.

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5.2.7. Technology Comparison and Final Selection

Based on the analysis in this section, two technologies do not pass the secondary screening: offshore wind and biomass. The following bullets highlight the reasons for these technologies not being selected.

- **Offshore Wind Power Plant**: This resource does not pass the secondary screening for a number of reasons. First, an offshore wind farm off the coast of PEI is only going to be able to achieve a performance level that is incrementally better than an onshore wind farm on PEI. The reason for this is because PEI's onshore wind resource is already very high. Secondly, the cost of offshore wind is an order of magnitude higher than onshore wind. Additionally, offshore wind power plants are typically hundreds to thousands of MWs in size, which allows them to capture economies of scale cost efficiencies. This is much larger than Maritime Electric's needs. Based on these two reasons, offshore wind is not selected to pass the secondary screening.
- **Biomass Power Plant**: This resource does not pass the secondary screening primarily as a result of both its high capital cost and the large land requirements to grow the solid biomass fuel. We estimate that a biomass power plant would cost approximately 2.8 times the cost of a similarly sized onshore wind farm and 2.6 times the cost of a similarly sized RICE power plant on PEI. Those higher costs do not equate to nearly the same level of additional value a biomass power plant would provide in terms of helping Maritime Electric meet its most critical needs. Additionally, the land requirements to grow the required biomass to fuel the power plant are very high. While it is unknown exactly how much land would be required since this would depend on the type of fuel utilized and where it is sourced from, it could easily stretch from 5,000 to 10,000 acres once one accounts for the fact that harvested biomass needs to be replanted and given time to grow (which can take years/decades) before it can be re-harvested again. As a result of both of these reasons, a biomass power plant is not selected to pass the secondary screening .

The remaining technologies pass the secondary screening and move on to the final screening, discussed in the following section. The following table is developed to help compare the various shortlisted technologies. The table combines both the cost of the resource and also the various key attributes of the different evaluated technologies with respect to the three evaluation criterion: 1) the resource's ability to contribute to Maritime Electric's energy and capacity obligations, 2) the resources ability to support the electrical system when PEI is disconnected from mainland, and 3) the resource's ability to help Maritime Electric achieve its sustainability targets. The table is color coded either green or red. Green technologies are those that are selected to pass the secondary screening. Red technologies do not pass the secondary screening.

Table 5-9 — Comparison of Various Shortlisted Resources

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6 . C A P A C I T Y R E S O U R C E R E C O M M E N D A T I O N S

6.1. FINAL TECHNOLOGY SELECTIONS

The following generation / storage technologies passed the secondary screening and are further analyzed in this section for potential recommendation for Maritime Electric.

- Onshore wind generation
- Utility-scale solar PV
- Rooftop solar PV generation
- Energy storage, lithium ion
- Reciprocating engine, with biofuel combustion compatibility
- Combustion turbine, with biofuel combustion compatibility

Given the above technologies each have unique characteristics and would serve different purposes for Maritime Electric, the greatest benefit to the electrical system is likely to be achieved using a combination of the above technologies. As such, different portfolios including the above technologies are defined and assessed in this section. Specifically, the following portfolios are considered:

- 1. BESS + onshore wind + solar PV (utility-scale and rooftop)
- 2. BESS + RICE + onshore wind + solar PV (utility-scale and rooftop)
- 3. BESS + CTs + onshore wind + solar PV (utility-scale and rooftop)
- 4. RICE or CTs + onshore wind + solar PV (utility-scale and rooftop)

The key considerations when developing these different portfolios are discussed as follows. Note that each of the above portfolios also assume the continued implementation and growth of the PEI DSM program.

6.1.1. Need for Additional Capacity

Additional capacity is needed on PEI. Due to the retirement of the Charlottetown oil-fired generators, Maritime Electric has had to increase the amount of capacity it purchases from the mainland to meet its regional obligations from 40% to over 60%. This leaves Maritime Electric and PEI vulnerable on a number of fronts.

First, it leaves Maritime Electric's customers more exposed to the economic repercussions of a likely capacity shortfall in the Maritimes region due to the retirement of coal throughout Canada by 2030 (as is discussed in further detail in Section [2.4.1\)](#page-346-0). The retirement of coal will necessitate significant changes to the generation portfolios of PEI's immediate neighbours. For reference, coal generation makes up 41% of Nova Scotia's generation portfolio (1,234 MW) and 12% of New Brunswick's portfolio (467 MW). While

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PEI's neighbours are planning on developing new capacity to replace their to be retired coal power plants, the level of investment and mobilization needed to replace all of the retired coal capacity is significant considering that the retirement deadline for the coal power plants is less than a decade away. As a result, some of this retired coal capacity will be met with market purchases or purchases from neighbours, as Nova Scotia Power is planning per discussion in their IRP; however, there currently is not enough transmission infrastructure in place for this increase in capacity demand to be met as cost effectively as possible. Separately, there is a forecasted increase in electrical demand in both the Maritimes region and in the northeastern United States over the next decade, which will further increase the capacity obligations of the regional utilities. All of this is likely to result in more competition and thus higher prices for regional capacity if the development of new generating resources and the implementation of regional energy efficiency programs cannot keep pace with demand growth. Any increase in capacity costs for Maritime Electric will be borne by Maritime Electric's customers.

In addition, the lack of capacity leaves Maritime Electric's customers vulnerable in the event of an electrical disconnection of PEI from the mainland. This situation has occurred a number of times in recent history (see Section [2.2.3\)](#page-341-0). In the event that PEI is electrically disconnected from the mainland in the winter (the season where system electrical demand is highest), there is not enough on-island generation installed to meet system load (as is discussed in detail in Section [2.2\)](#page-335-0). As a result, Maritime Electric will be forced to implement rolling blackouts. With additional on-island capacity, the rolling blackouts will either become unnecessary (if enough capacity is added to fully meet load) or the severity of the rolling blackouts will decrease. Given the potential repercussions of blackouts can be life threatening, it is critical Maritime Electric add on-island capacity. As discussed in Section [2.2.4,](#page-343-0) we estimate that a minimum of 85 MW of dispatchable capacity needs to be added to the system to be able to bring the ratio of total dispatchable capacity versus winter peak load back in line with historical levels. An additional 40 MW will likely be required when the existing Borden generating units have reached end of life and are retired. Without this level of additional capacity, it is highly likely that any future rolling blackouts that result from a disconnection of PEI from the mainland will be much more severe than those that have occurred in the past.

Of the remaining resources that have passed the secondary screening, only BESS, RICE, and CTs are effective sources of capacity. While wind and solar PV are excellent sources of energy, they are poor sources of capacity. From a cost perspective, both RICE and CT's cost less than a 4-hour BESS (4 hours is one of the most common BESS durations in the energy industry). An important additional consideration regarding BESS, is that it would not be as dependable for Maritime Electric as RICE or CTs would be during a disconnection from the mainland. The reason for this is because the level of support a BESS could provide during a disconnection is dependent on a number of external variables, such as the state of charge of the BESS when the disconnection occurs, wind generation during the disconnection, and the length of time before the connection to the mainland can be restored. At best, a BESS system could be very helpful for

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Maritime Electric during a disconnection from the mainland; however, at worst (i.e., when the state of charge of the BESS was low when the disconnection occurred and the wind generators were in emergency shutdown), a BESS system would be ineffective at supporting the system.

6.1.2. Meeting Sustainability Targets

Maritime Electric needs to pursue more carbon free generation in order it to meet its sustainability target of reducing greenhouse gas emissions by 55% by 2030 (from 2019 levels). Of the remaining resources that have passed the secondary screening, onshore wind and solar PV (both utility-scale and rooftop) are carbon-free generation sources. Given PEI's excellent onshore wind resource and the relatively low cost to build onshore wind power plants, the continued development of onshore wind should be a main priority for Maritime Electric and PEI. While solar PV will not provide near the same amount of generation for Maritime Electric on a per dollar invested basis as onshore wind, solar PV does have some benefits that make it worth consideration. First, it provides generation diversity to Maritime Electric's portfolio. More specifically, wind and solar generation are not perfectly correlated; thus, the integration of solar PV will help to provide some balance to the island's hourly generation. Additionally, solar PV is relatively low-cost. As a result of these reasons, it is recommended that Maritime Electric and PEI pursue the development of some utilityscale solar PV projects and continue to encourage and support the development of rooftop solar PV on the island.

As discussed earlier (see Section [3.2.1\)](#page-359-0), BESS will have a limited ability to help Maritime Electric meet its sustainability targets. In order for BESS to be able to help Maritime Electric meet its sustainability targets, it would have to be able to charge from a carbon-free resource during a time when that resource's generation could not be used on the island, and discharge that energy back into the system at a later time. At present, there are very rarely times when the generation produced from PEI's carbon-free resources (e.g., the wind farms on PEI) cannot be used immediately to serve load. As more wind generation is installed on PEI, there will be more frequent instances where high amounts of hourly wind generation will result in an oversupply of electricity – a future BESS project could shift this excess electricity to other times. However, the forecasted frequency at which additional wind generation will cause an oversupply of electricity in the future is likely not going to be high enough to fully justify the cost to install a new BESS project.

6.2. PORTFOLIOS CONSIDERED

6.2.1. Portfolio A: BESS + Onshore Wind + Solar PV

The combination of BESS, onshore wind, and solar PV would provide Maritime Electric with carbon-free generation to help meet both its energy obligations and sustainability targets, along with storage to meet its regional capacity obligations. The wind and solar PV would reduce the amount of energy needed to be

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purchased from NBEM. In addition, the combination of this additional energy from the wind and solar PV projects, combined with the capacity from the BESS, will help to provide a buffer against regional market price volatility in energy and capacity.

A BESS project could offer some additional advantages for Maritime Electric in addition to providing capacity to meet regional obligations. For example, a BESS project could allow Maritime Electric to pursue an energy arbitrage strategy if it wished to participate in an energy marketplace. Additionally, a BESS project could provide various ancillary services and system electrical support for Maritime Electric. While a single BESS project is unlikely to be able to provide all of the different possible functions simultaneously, it can be used for multiple functions. To better assess and quantify the potential benefits a BESS might be able to provide, an approach Maritime Electric could pursue is working with the PEI government to develop a demonstration 4-hour BESS project. As a demonstration project, Maritime Electric and PEI would be better able to assess which functions/use cases future BESS projects might be utilized for to maximize the benefit for PEI and Maritime Electric's customers.

Portfolio A does run into a few challenges when considering an electrical disconnection of PEI from the mainland. Because of their intermittency, onshore wind and solar PV energy are both unreliable resources during a disconnection. If either the onshore wind, solar PV, or both are not operating, no electricity is being generated. While the BESS can support the system, the amount of support it can provide is difficult to forecast since it depends on its state of charge, generation from the wind/solar PV, and the length of the disconnection. If the BESS was unable to provide much support to the system, Maritime Electric would be completely reliant on the few existing dispatchable generators it has on the island (which is the position Maritime Electric is currently in today), which are not sufficient to allow Maritime Electric to avoid severe rolling blackouts.

The following tables provide the forecasted capacity, energy, and emissions sources for this portfolio. Note that the new BESS project marginally increases the amount of wind energy Maritime Electric can utilize to serve load because BESS can capture a portion of the wind generation that would otherwise have to be sold back to the mainland during periods where there is excess total generation beyond load. In addition, while it is difficult to forecast exactly how much a new BESS project would be able to reduce the need for the on-island diesel generators, it is assumed that the BESS reduces on-island diesel generator dispatch by 50%.

Note that the tables assume a 50 MW, 4-hour duration BESS is added to the system, not 85 MW of additional capacity (see Section [2.2.4](#page-343-0) for the basis of the 85 MW recommendation). The reason for this is because the 85 MW capacity recommendation is for fully dispatchable capacity that would specifically be able to help Maritime Electric better manage a situation where PEI is electrically disconnected from the mainland. As discussed, a new BESS project might not be dispatchable during a disconnection from the

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mainland. As such, the capacity of a new BESS project is not considered to be able to fully satisfy the dispatchability requirements associated with the 85 MW capacity recommendation in Sectio[n 2.2.4.](#page-343-0) Instead, this portfolio considers a 50 MW BESS project to minimize portfolio costs.

Table 6-1 — Estimated Portfolio A Capacity Sources

Table 6-2 — Estimated Portfolio A Energy Sources

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Table 6-3 — Estimated Portfolio A Emissions Sources

Notes

1) Carbon emissions rates related to purchases from NBEM are based on 2019, 2020, and 2021 data compiled by Maritime Electric and contained in the 2022 Maritime Electric Sustainability Report [\(https://www.maritimeelectric.com/Media/1959/2022](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf) [sustainability-report_final_interactive-pdf_july-28-2022.pdf\)](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf). Note the NBEM emissions rate (on a tonnes CO₂e per GWh basis) used to calculate carbon emissions is kept consistent for all the years shown in the table above; however, this rate is expected to fall with time as mainland utilities pursue various decarbonization strategies.

6.2.2. Portfolio B: BESS + RICE + Onshore Wind + Solar PV

A combination of onshore wind, solar PV, BESS and RICE would provide Maritime Electric with much of the same benefits as the previous portfolio, but with a much better ability to navigate an electrical disconnection from the mainland. The onshore wind and solar PV are both carbon-free sources of electricity that would help Maritime Electric both meet its sustainability targets and purchase less energy from NBEM. Both the BESS and RICE would also help Maritime Electric meet their capacity obligations.

The addition of the RICE does add a carbon emission consideration into the portfolio since a RICE power plant generates carbon emissions when it burns fuel. Because a RICE power plant would primarily serve as a backup generator and rarely operate, carbon emissions generated by the RICE power plant will be small and have little impact on Maritime Electric's ability to meet sustainability targets, but it could create a stranded asset problem for Maritime Electric if the government of Canada begins enforcing stricter rules on allowable fuels for power generation. One distinct advantage of a RICE power plant is that it can operate on fuels the government of Canada considers to be renewable, such as biodiesel²⁷. The fact that RICE can operate on renewable fuels helps Maritime Electric avoid the risk that a new RICE power plant would become a stranded asset in the future if fuel regulations change.

A RICE power plant would also significantly help Maritime Electric during a disconnection from the mainland. The addition of a RICE power plant to PEI would provide Maritime Electric more dependable dispatchable capacity to both serve load and also to balance the wind generation intermittency during a

²⁷ RICE power plants are also likely to be able to operate on hydrogen in the coming years, but hydrogen operation would require a significant capital investment for the hydrogen infrastructure. Given a new RICE power plant would primarily be used as a backup generator, the investment in hydrogen infrastructure is likely not worth the investment for Maritime Electric.

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disconnection, which would in turn allow Maritime Electric to utilize more of PEI's wind capacity without risking an imbalance of generation and load. While the BESS project could help support the system during a disconnection from the mainland in many of the same ways, the level of support it can provide depends on the BESS' state of charge, generation from the wind/solar PV, and the length of the disconnection, which are all difficult to forecast.

Similar to Portfolio A, a BESS project could offer some additional advantages for Maritime Electric in addition to providing capacity to meet regional obligations, such as allowing Maritime Electric to pursue an energy arbitrage strategy (if it wished to participate in an energy marketplace), providing various ancillary services and system electrical support to the system, among other items. As a demonstration project, Maritime Electric and PEI would be better able to assess which functions/use cases future BESS projects might be utilized for to maximize the benefit for PEI and Maritime Electric's customers.

The following tables provide the forecasted capacity, energy, and emissions sources for this portfolio. The new BESS project marginally increases the amount of wind energy Maritime Electric can utilize to serve load because BESS can capture a portion of the wind generation that would otherwise have to be sold back to the mainland during periods where there is excess generation beyond load. In addition, it is assumed that the new BESS allows Maritime Electric to be able to reduce on-island diesel generator dispatch by 50%.

Similar to Portfolio A, a 50 MW, 4-hour duration BESS is added to the system. In addition, a total of 85 MW of new RICE is added to this portfolio to be consistent with the recommendation in Section [2.2.4.](#page-343-0) Due to BESS' inability to be fully dispatchable during a disconnection from the mainland, the capacity of a new BESS project is not considered to be able to fully satisfy the dispatchability requirements associated with the 85 MW capacity recommendation in Section [2.2.4.](#page-343-0)

Table 6-4 — Estimated Portfolio B Capacity Sources

Table 6-5 — Estimated Portfolio B Energy Sources

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Table 6-6 — Estimated Portfolio B Emissions Sources

Portfolio B	Year									
	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
MECL Emissions (kilo-Tonnes CO ₂ e)										
Borden Generating Station (CTs)	1.2	1.2	0.3	0.3	0.3	0.3	0.3	Ω	Ω	0
Charlottetown CT3	1.4	1.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4
Point Lepreau Nuclear	O	Ω	0	Ω	0		Ω	Ω		Ω
Energy Purchases (NBEM)	273	248	244	201	204	206	209	216	224	231
New BESS		Ω	0	⁰	0	0	0	Ω		0
New Reciprocating Engines (Biodiesel)	⁰	$\mathbf 0$	0.2	0.2	0.2	0.2	0.2	0.3	0.3	0.3
Wind Power		Ω		O	0		0			0
Rooftop Solar PV		Ω	0		Ω		Ω			0
Utility Scale Solar PV		$\mathbf 0$	0	0	0	0	0	Ω	0	0
Total Emissions (kilo-Tonnes CO ₂ e)	276	251	244	202	204	207	210	217	224	232

Notes

1) Carbon emissions rates related to purchases from NBEM are based on 2019, 2020, and 2021 data compiled by Maritime Electric and contained in the 2022 Maritime Electric Sustainability Report [\(https://www.maritimeelectric.com/Media/1959/2022](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf) [sustainability-report_final_interactive-pdf_july-28-2022.pdf\)](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf). Note the NBEM emissions rate (on a tonnes CO₂e per GWh basis) used to calculate carbon emissions is kept consistent for all the years shown in the table above; however, this rate is expected to fall with time as mainland utilities pursue various decarbonization strategies.

2) Biodiesel emissions assume B100 fuel is used and are calculated assuming the lifecycle emissions (from the production of the B100 fuel through combustion) are 70% less than traditional diesel fuel. The actual lifecycle emissions may vary based on a number of factors, including fuel composition, production method, etc. Note that the Canadian government considers biodiesel as a renewable fuel.

6.2.3. Portfolio C: BESS + Combustion Turbines + Onshore Wind + Solar PV

This portfolio is very similar to the previous portfolio in that it contains both renewable and dispatchable generation. While the technologies are different, RICE and CTs are very similar in how they would be utilized by Maritime Electric, the type of support they can provide to an electrical system, and the types of fuel they can operate on. As a result, all of the information discussed for the previous portfolio (BESS + RICE + onshore wind + solar PV) is consistent for this portfolio.

There are some small differences between RICE and CTs that are worth mentioning. The first difference is cost. We estimate a slight cost premium to pursue CTs instead of RICE, estimated at between 5% and 10% depending on the fuel type considered (biodiesel versus diesel). Included in this price premium are some equipment modifications that would be required to convert a CT to be able to burn biodiesel. A RICE would not require modification to burn either fuel. Both RICE and CTs would require minor modifications to balance of plant/fuel storage. Finally, CTs burn between 10% and 20% more fuel on a per output basis than RICE (i.e., they are less fuel efficient), depending on the type of fuel. Given the slight cost premium and lower fuel efficiency of CTs versus RICE, we consider a portfolio with RICE to be a better option for Maritime Electric; however, the two technologies have so many similarities that either would be a sound choice.

The following tables provide the forecasted capacity, energy, and emissions sources for this portfolio. The new BESS project marginally increases the amount of wind energy Maritime Electric can utilize to serve load because BESS can capture a portion of the wind generation that would otherwise have to be sold back to the mainland during periods where there is excess generation beyond load. In addition, it is assumed

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that the new BESS allows Maritime Electric to be able to reduce on-island diesel generator dispatch by 50%.

Similar to Portfolios A and B, a 50 MW, 4-hour duration BESS is added to the system. In addition, a total of 85 MW of new CTs are added to this portfolio to be consistent with the recommendation in Section [2.2.4.](#page-343-0) Due to BESS' inability to be fully dispatchable during a disconnection from the mainland, the capacity of a new BESS project is not considered to be able to fully satisfy the dispatchability requirements associated with the 85 MW capacity recommendation in Section [2.2.4.](#page-343-0)

Table 6-7 — Estimated Portfolio C Capacity Sources

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Table 6-8 — Estimated Portfolio C Energy Sources

Table 6-9 — Estimated Portfolio C Emissions Sources

Notes

- 1) Carbon emissions rates related to purchases from NBEM are based on 2019, 2020, and 2021 data compiled by Maritime Electric and contained in the 2022 Maritime Electric Sustainability Report [\(https://www.maritimeelectric.com/Media/1959/2022](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf) [sustainability-report_final_interactive-pdf_july-28-2022.pdf\)](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf). Note the NBEM emissions rate (on a tonnes CO₂e per GWh basis) used to calculate carbon emissions is kept consistent for all the years shown in the table above; however, this rate is expected to fall with time as mainland utilities pursue various decarbonization strategies.
- 2) Biodiesel emissions assume B100 fuel is used and are calculated assuming the lifecycle emissions (from the production of the B100 fuel through combustion) are 70% less than traditional diesel fuel. The actual lifecycle emissions may vary based on a number of factors, including fuel composition, production method, etc. Note that the Canadian government considers biodiesel as a renewable fuel.

6.2.4. Portfolio D: RICE or Combustion Turbines + Onshore Wind + Solar PV

This portfolio is similar to the previous portfolios but forgoes the inclusion of a battery. Given the similarities between RICE and CTs, this portfolio considers that either technology is pursued, albeit with a cost premium if CTs are pursued since they are slightly more expensive than RICE. The combination of RICE or CTs, onshore wind, and solar PV would provide Maritime Electric with carbon-free generation to help meet both its energy obligations and sustainability targets, along with capacity to meet its regional obligations. The wind and solar PV would reduce the amount of energy needed to be purchased from NBEM. In addition, the combination of this additional energy from the wind and solar PV projects, combined with the capacity

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from the RICE or CTs, will help to provide a buffer against regional market price volatility in energy and capacity.

The fact that both RICE and CTs can operate on fuels that are considered to be renewable (i.e., biodiesel) also helps Maritime Electric to avoid investing in an asset that might become stranded in the event that the government of Canada changes regulations on allowable fuels for power generation.

Also, as previously discussed, RICE and CT power plants would significantly help Maritime Electric during a disconnection of PEI from the mainland. These generators would provide Maritime Electric more dependable dispatchable capacity to both serve load and also to balance the wind generation intermittency during a disconnection, which would in turn allow Maritime Electric to utilize more of PEI's wind capacity without risking an imbalance of generation and load. This will either help to eliminate or reduce the severity of rolling blackouts if PEI becomes disconnected from the mainland.

The following tables provide the forecasted capacity, energy, and emissions sources for this portfolio. A total of 85 MW of new CTs are added to this portfolio to be consistent with the recommendation in Section [2.2.4.](#page-343-0)

Table 6-10 — Estimated Portfolio D Capacity Sources

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Table 6-12 — Estimated Portfolio D Emissions Sources

Notes

1) Carbon emissions rates related to purchases from NBEM are based on 2019, 2020, and 2021 data compiled by Maritime Electric and contained in the 2022 Maritime Electric Sustainability Report [\(https://www.maritimeelectric.com/Media/1959/2022](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf) [sustainability-report_final_interactive-pdf_july-28-2022.pdf\)](https://www.maritimeelectric.com/Media/1959/2022-sustainability-report_final_interactive-pdf_july-28-2022.pdf). Note the NBEM emissions rate (on a tonnes CO₂e per GWh basis) used to calculate carbon emissions is kept consistent for all the years shown in the table above; however, this rate is expected to fall with time as mainland utilities pursue various decarbonization strategies.

2) Biodiesel emissions assume B100 fuel is used and are calculated assuming the lifecycle emissions (from the production of the B100 fuel through combustion) are 70% less than traditional diesel fuel. The actual lifecycle emissions may vary based on a number of factors, including fuel composition, production method, etc. Note that the Canadian government considers biodiesel as a renewable fuel.

6.3. FINAL RECOMMENDATION

Based on the above discussions, the following portfolio is recommended for Maritime Electric:

• **Portfolio D**: RICE + Onshore Wind + Solar PV

This portfolio was selected due to its ability to most cost-effectively meet the three most critical needs of Maritime Electric: 1) meeting energy and regional capacity obligations, 2) supporting the system if PEI is disconnected from the mainland, and 3) supporting sustainability targets. For this portfolio, RICE was selected over CTs due to its lower cost and better fuel efficiency.

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Sargent & Lundy 89 As discussed in Section [2.2.4,](#page-343-0) we estimate that a minimum of 85 MW of dispatchable capacity needs to be added to the system to be able to bring the ratio of total dispatchable capacity versus winter peak load back in line with historical levels. Without this level of additional capacity, it is highly likely that future rolling blackouts (that occur as a result of a disconnection of PEI from the mainland) will be much more severe than those that have occurred in the past. The additional capacity should be added to the system as soon as possible.

The reason BESS was not included in the recommended portfolio was primarily because of two reasons. First, a BESS solution is not as effective as the other shortlisted technologies at helping Maritime Electric meet its three most critical needs. Secondly, a BESS solution is a higher cost option than the other shortlisted technologies.

It is important to note that a BESS solution could offer some additional advantages for Maritime Electric beyond its three most critical needs, such as allowing Maritime Electric to pursue an energy arbitrage strategy (if they wished to participate in an energy marketplace in the future), providing various ancillary services and other system electrical support, and helping to manage times when there is excess wind generation (which will occur more frequently as more onshore wind is integrated onto PEI). If it were determined that a BESS solution should be pursued, we recommend Maritime Electric pursue working with the PEI government to develop a demonstration 4-hour BESS project. As a demonstration project, Maritime Electric and PEI would be better able to assess which functions/use cases future BESS projects might be utilized for to maximize the benefit for PEI and Maritime Electric's customers.

A P P E N D I X A . C A P I T A L C O S T E S T I M A T E S

This appendix contains generation/storage resource capital cost estimates. All values in Canadian dollars.

Thermal Units – Reciprocating Engines

(1) Costs based on EPC contracting approach.

(2) Interconnection and land costs are assumed values

(3) Property taxes and insurance costs are not included in the above estimate.

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Thermal Units – Combustion Turbines

(1) Costs based on EPC contracting approach. (2) Interconnection and land costs are assumed values (3) Property taxes and insurance costs are not included in the above estimate.

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Battery Energy Storage – Lithium Ion

(1) Costs based on EPC contracting approach.

(2) Interconnection and land costs are assumed values

(3) Property taxes and insurance costs are not

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Onshore Wind

(1) Costs based on EPC contracting approach.

(2) Interconnection costs are assumed values, land lease costs included in O&M

(3) Property taxes and insurance costs are not included in the above estimate.

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Utility Scale Solar PV

Bifacial, fixed-tilt configuration

(1) Costs based on EPC contracting approach.

(2) Interconnection costs are assumed values, land lease costs included in O&M

(3) Property taxes and insurance costs are not included in the above estimate.

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Rooftop Solar PV

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Biomass Power Plant

(1) Costs based on EPC contracting approach.

(2) Interconnection and land costs are assumed values

(3) Property taxes and insurance costs are not included in

the above estimate.

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A P P E N D I X B . O & M C O S T E S T I M A T E S

This appendix contains generation/storage resource operations and maintenance cost estimates. All values in Canadian dollars.

Thermal Units – Reciprocating Engines

VOM (non-fuel) *Variable O&M - Hours Based (\$/MWh)*

(1) O&M expenses assume low utilization (1% capacity factor); thus predominately allocate O&M spend on a variable basis. (2) Given the low utilization, RICE and CT O&M expenses are assumed to be similar.

Thermal Units – Combustion Turbines

(1) O&M expenses assume low utilization (1% capacity factor); thus

predominately allocate O&M spend on a variable basis. (2) Given the low utilization, RICE and CT O&M expenses are

assumed to be similar.

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Battery Energy Storage – Lithium Ion

Variable O&M

Included in FOM Above (Assumes 1 Cycle/Day)

(1) Calculations assume 3 augmentations over 20 years, spaced at 5 year intervals.

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(1) Assumes O&M is performed by an independent service provider (2) All O&M costs are on a fixed-cost basis

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Utility Scale Solar PV

Bifacial, fixed-tilt configuration

**Note: If a 50 MW solar power plant is built as 5 different 10MW individual locations, it will likely utilize central inverters. By contrast, if a larger number of smaller MW locations are developed, it is more likely that string inverters will be utilized. Costs for string vs. central inverters vary slightly on a capital and O&M basis, but differences are unlikely to be significant enough to exclusively drive development decisions over other considerations.*

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The following table presents a 20-year comparison of operational costs for a 50 MW (4-hour duration) BESS to a similar sized RICE project. In order to maintain a consistent BESS performance level, the BESS project is assumed to be augmented every 5 years to counteract the impact of BESS degradation. A BESS project does not have to be augmented; however, a typical non-augmented project can be expected to degrade approximately 25% to 30% over a 20-year lifespan. All values in the table below are presented in 2022 Canadian Dollars.

Note: All values in CAD and shown in 2022 dollars

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A P P E N D I X C . E F F E C T I V E L O A D C A R R Y I N G C A P A B I L I T Y I N T R O D U C T I O N

The technical characteristics of different generators can result in the generators providing varying levels of contributions towards resource adequacy. To effectively evaluate different technologies and their contributions towards improving system resource adequacy, a concept called the Effective Load Carrying Capability (ELCC) of a generator is used. In simple terms, the ELCC of a generator reflects how much the generator is able to contribute towards system resource adequacy (in the case of Maritime Electric, the "system" is the entire Maritimes Area, including Nova Scotia, New Brunswick, and the northern tip of Maine). As a single measure, the ELCC allows for quick comparison of resource adequacy contributions of different generators. The use of ELCC as a measure to quantify a generator's contributions towards resource adequacy has increased with the growth in renewable generators, such as solar, wind, and other similar generation technologies, since the variable generation profiles of these generators makes it more of a complex process to quantify the contributions of these generators towards serving system load.

The ELCC of a generator can vary based on a number of variables, including the dispatchability characteristics of the generator. For example, if generation were needed to meet load in the evening, a stand-alone solar power plant would have a lower overall ELCC than a solar power plant paired with an energy storage system. This is due simply to the fact that the stand-alone solar power plant would not be capable of generating much electricity in the evening (since the sun would have nearly set at this time), while the storage system paired to the other solar power plant likely could generate electricity in the evening (provided the storage is sufficiently charged). ELCC will vary from one planning region to another because load and generation characteristics change from region to region.

ELCC is typically expressed as a percentage of what could be provided by a "perfect generator", or a generator that would be available to dispatch every hour of the day, all days of the year. For example, a 100-MW wind generator with an ELCC of 25% would help improve system resource adequacy by an equal amount as a 25 MW perfect generator. An equivalent way to view ELCC is to consider how much system load could be increased with the additional generator such that the system resource adequacy level prior to adding the generator would be equivalent to the resource adequacy level after adding the generator. For example, consider a system with a loss of load expectation (LOLE) or equal to 0.10 days/year. A 100 MW wind power plant is added to the system, resulting in the system LOLE to drop to 0.09 days/year. It was then observed that if load were increased by 25 MW, the system LOLE increased back up to 0.10 days/year. In this case, the ELCC of the wind power plant would be equal to 25% (25 MW load increase / 100 MW wind capacity).

Capacity Resource Study

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It is important to note that the ELCC is a measure of marginal system impact, or the incremental contribution towards resource adequacy. The state of the electrical system from a resource adequacy perspective at the specific time the new generator is added has an impact on the new generator's ELCC. For example, consider the 100 MW wind power plant described above with an ELCC equal to 25% is added to a system. Then, if a second 100 MW of wind is added to the system, the ELCC of the second 100 MW would be less than 25%. The reason for this is because the contributions of additional similar generators towards improving system resource adequacy have diminishing returns. This is illustrated in the following figure, where each dot to the right of the existing system represents additional generators have been added. In the figure, the ELCC of the first new generator would be higher than subsequent generators of similar technology since the amount of LOLE improvement per MW's added reduces with each subsequent addition.

Given that there are costs associated with adding new generators, it is important for system planners to assess the appropriate balance between the desired system LOLE target and system cost, especially since the benefits associated with additional returns diminishes with each additional MW added.

Maritime Electric has calculated the ELCC of wind generation as function of total wind capacity installed. The following figure is taken from Maritime Electric's 2020 Integrated System Plan and illustrates the ELCC

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of wind. As can be observed in the figure, each additional MW of installed wind capacity on PEI have smaller contributions to resource adequacy.

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A P P E N D I X D . P V S Y S T S O L A R O U T P U T R E P O R T S

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PVsyst - Simulation report

Grid-Connected System

Project: PEI - Solar PV Feasibility

Variant: Case 1 - 10 MW - Monofacial - Fixed Unlimited sheds System power: 14.50 MWp Prince Edward Island - Canada

> **Author** Sargent & Lundy LLC (United States)

Variant: Case 1 - 10 MW - Monofacial - Fixed

Sargent & Lundy LLC (United States)

PVsyst V7.2.12 VC0, Simulation date: 27/09/22 10:45 with v7.2.12

PVsyst V7.2.12 VC0, Simulation date: 27/09/22 10:45 with v7.2.12

Variant: Case 1 - 10 MW - Monofacial - Fixed

Sargent & Lundy LLC (United States)

Total power

Total power Number of inverters Pnom ratio

> 1.2 mΩ 1.5 % at STC

Operating voltage Pnom ratio (DC:AC)

Total inverter power

Array losses Average loss Fraction 2.5 %

DC wiring losses Global array res.

14.50 MWp 788 Strings x 32 In series

> 13.32 MWp 969 V 13747 A

14499 kWp 25216 modules 71364 m²

Thermal Loss factor

Array Soiling Losses

Nominal (STC) Modules

Total PV power Nominal (STC)

Pmpp U mpp I mpp

Total Module area

At operating cond. (50°C)

10920 kWac

10920 kWac 13 units 1.33

LID - Light Induced Degradation Loss Fraction 1.0 %

915-1300 V 1.33

Project: PEI - Solar PV Feasibility

Variant: Case 1 - 10 MW - Monofacial - Fixed

PVsyst V7.2.12

VC0, Simulation date: 27/09/22 10:45 with v7.2.12

Sargent & Lundy LLC (United States)

PVsyst V7.2.12 VC0, Simulation date: 27/09/22 10:45 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 1 - 10 MW - Monofacial - Fixed

Sargent & Lundy LLC (United States)

Horizon definition Horizon from Meteonorm web service, lat=46.3396, lon=-63.4083 Average Height 2.5 Albedo Factor 0.74 Diffuse Factor 0.98 Albedo Fraction 100 % **Horizon profile** Azimuth [°] -180 -121 -120 -118 -117 -64 -63 -61 -60 -59 -58 -56 Height [°] 0.0 0.0 1.0 1.0 2.0 2.0 3.0 3.0 4.0 4.0 5.0 5.0 Azimuth [°] -55 26 27 30 32 59 60 123 124 167 168 179 6.0 5.0 Height [°] 6.0 5.0 3.0 3.0 2.0 2.0 1.0 1.0 0.0 0.0 **Sun Paths (Height / Azimuth diagram)** 90 $1:22$ June Shading limit, angle = 24.8° 2: 22 May and 23 July Shading 20 % $---$ 3: 20 Apr and 23 Aug Shading 40 % 4: 20 Mar and 23 Sep 75 5: 21 Feb and 23 Oct 6: 19 Jan and 22 Nov $12h$ $13h$ 7: 22 December ิร $11h$ $\overline{2}$ $14h$ 60 10_h 3 $15h$ Sun height^{[°}] $9h$ 45 $16h$ 8_h 17_h 30 $18h$ -6ł 15 -90 -60 -30 $\pmb{\mathsf{O}}$ 30 60 90 120 120 Azimuth [°]

VC0, Simulation date: 27/09/22 10:45 with v7.2.12

Variant: Case 1 - 10 MW - Monofacial - Fixed

Sargent & Lundy LLC (United States)

Main results

System Production

Produced Energy Apparent energy

17 GWh/year 17774 MVAh

Specific production Performance Ratio PR

1162 kWh/kWp/year 86.98 %

Balances and main results

Legends

PVsyst V7.2.12 VC0, Simulation date: 27/09/22 10:45 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 1 - 10 MW - Monofacial - Fixed

Sargent & Lundy LLC (United States)

Loss diagram

5.67 kVAR Reactive energy to the grid: Aver. cos(phi) = 0.948 **17.77 kVA Apparent energy to the grid**

Project: PEI - Solar PV Feasibility

Variant: Case 1 - 10 MW - Monofacial - Fixed

Sarge

Sargent & Lundy LLC (United States)

PVsyst - Simulation report

Grid-Connected System

Project: PEI - Solar PV Feasibility

Variant: Case 2 - 10 MW - Bifacial - Fixed Unlimited sheds System power: 14.50 MWp Prince Edward Island - Canada

> **Author** Sargent & Lundy LLC (United States)

Project: PEI - Solar PV Feasibility

Variant: Case 2 - 10 MW - Bifacial - Fixed

Sargent & Lundy LLC (United States)

PVsyst V7.2.12 VC1, Simulation date: 27/09/22 10:57 with v7.2.12

PVsyst V7.2.12 VC1, Simulation date: 27/09/22 10:57 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 2 - 10 MW - Bifacial - Fixed

Sargent & Lundy LLC (United States)

Modules

Pmpp U mpp I mpp

At operating cond. (50°C)

Operating voltage Pnom ratio (DC:AC)

788 Strings x 32 In series

13.32 MWp 969 V 13747 A

PVsyst V7.2.12 VC1, Simulation date: 27/09/22 10:57 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 2 - 10 MW - Bifacial - Fixed

Sargent & Lundy LLC (United States)

AC wiring losses Inv. output line up to MV transfo Inverter voltage Loss Fraction 630 Vac tri 0.04 % at STC **Inverter: Solar Ware- PVU-L0840GR** Wire section (13 Inv.) Average wires length Copper 13 x 3 x 700 mm² 5 m **MV line up to HV Transfo** MV Voltage Average each inverter Wires Length Loss Fraction 34.5 kV Copper 3 x 95 mm² 5700 m 0.50 % at STC **HV line up to Injection** HV line voltage Wires Length Loss Fraction 138 kV Copper 3 x 16 mm² 1024 m 0.10 % at STC

PVsyst V7.2.12

VC1, Simulation date: 27/09/22 10:57 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 2 - 10 MW - Bifacial - Fixed

Sargent & Lundy LLC (United States)

PVsyst V7.2.12 VC1, Simulation date: 27/09/22 10:57

Project: PEI - Solar PV Feasibility

Variant: Case 2 - 10 MW - Bifacial - Fixed

Sargent & Lundy LLC (United States)

Project: PEI - Solar PV Feasibility

Variant: Case 2 - 10 MW - Bifacial - Fixed

Sargent & Lundy LLC (United States)

Main results

System Production

Produced Energy Apparent energy

17 GWh/year 18404 MVAh

Specific production Performance Ratio PR

1203 kWh/kWp/year 90.06 %

Balances and main results

Legends

PVsyst V7.2.12 VC1, Simulation date: 27/09/22 10:57 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 2 - 10 MW - Bifacial - Fixed

Sargent & Lundy LLC (United States)

Loss diagram 1226 kWh/m² Global horizontal irradiation +9.0% Global incident in coll. plane -0.59% Far Shadings / Horizon -0.97% Near Shadings: irradiance loss -0.81% IAM factor on global -1.86% Soiling loss factor +0.02% Ground reflection on front side **Bifacial Global incident on ground** 340 kWh/m² on 101871 m² -72.99% (0.27 Gnd. albedo) Ground reflection loss -35.26% View Factor for rear side +1.33% Sky diffuse on the rear side +0.01% Beam effective on the rear side -5.00% Shadings loss on rear side **6.39% Global Irradiance on rear side (82 kWh/m²) 1280 kWh/m² * 71364 m² coll. Effective irradiation on collectors** efficiency at STC = 20.41% PV conversion, Bifaciality factor = 0.70 **19.48 GWh Array nominal energy (at STC effic.)** -0.22% Module Degradation Loss (for year #1) -0.30% PV loss due to irradiance level اب -0.06% PV loss due to temperature
+ -0.77% Shadings: Electrical Loss Shadings: Electrical Loss, sheds3 strings in width +0.43% Module quality loss -1.00% LID - Light induced degradation -0.90% Mismatch loss, modules and strings -0.62% Mismatch for back irradiance -0.82% Ohmic wiring loss **18.66 GWh Array virtual energy at MPP** -1.64% Inverter Loss during operation (efficiency) -1.47% Inverter Loss over nominal inv. power)0.00% Inverter Loss due to max. input current
)0.00% Inverter Loss over nominal inv. voltage)0.00% Inverter Loss over nominal inv. voltage
)0.00% Inverter Loss due to nower threshold 9 0.00% Inverter Loss due to power threshold
1 0.00% Inverter Loss due to voltage threshold 0.00% Inverter Loss due to voltage threshold Night consumption **18.08 GWh Available Energy at Inverter Output** -0.29% Auxiliaries (fans, other) -0.02% AC ohmic loss -1.12% Medium voltage transfo loss -0.24% MV line ohmic loss -0.53% High voltage transfo loss -0.05% HV line ohmic loss -1.33% Unused energy (grid limitation) **17.44 GWh Active Energy injected into grid** 5.87 kVAR **Reactive energy to the grid: Aver. cos(phi) = 0.948** Reactive energy to the grid: Aver. cos(phi) = 0.948 **18.40 kVA Apparent energy to the grid**

Project: PEI - Solar PV Feasibility

Variant: Case 2 - 10 MW - Bifacial - Fixed

Sargent & Lundy LLC (United States)

PVsyst - Simulation report

Grid-Connected System

Project: PEI - Solar PV Feasibility Variant: Case 3 - 10 MW - Monofacial - SAT Unlimited Trackers with backtracking System power: 13.01 MWp Prince Edward Island - Canada

> **Author** Sargent & Lundy LLC (United States)

Variant: Case 3 - 10 MW - Monofacial - SAT

Sargent & Lundy LLC (United States)

PVsyst V7.2.12 VC2, Simulation date: 27/09/22 11:03 with v7.2.12

PVsyst V7.2.12 VC2, Simulation date: 27/09/22 11:03 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 3 - 10 MW - Monofacial - SAT

Sargent & Lundy LLC (United States)

(Custom parameters definition)

Number of inverters Total power

Operating voltage Pnom ratio (DC:AC)

Total inverter power

Total power Number of inverters Pnom ratio

Unit Nom. Power 840 kWac

13 units 10920 kWac

10920 kWac 13 units 1.19

915-1300 V 1.19

(Custom parameters definition)

Number of PV modules Nominal (STC) Modules

At operating cond. (50°C)

Total PV power Nominal (STC)

Pmpp U mpp I mpp

Total Module area

Unit Nom. Power 575 Wp

22624 units 13.01 MWp 707 Strings x 32 In series

> 11.95 MWp 969 V 12334 A

13009 kWp 22624 modules 64029 m²

PVsyst V7.2.12 VC2, Simulation date: 27/09/22 11:03 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 3 - 10 MW - Monofacial - SAT

Sargent & Lundy LLC (United States)

0.50 % at STC

PVsyst V7.2.12

VC2, Simulation date: 27/09/22 11:03 with v7.2.12

Variant: Case 3 - 10 MW - Monofacial - SAT

Sargent & Lundy LLC (United States)

PVsyst V7.2.12 VC2, Simulation date: 27/09/22 11:03 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 3 - 10 MW - Monofacial - SAT

Sargent & Lundy LLC (United States)

Horizon definition Horizon from Meteonorm web service, lat=46.3396, lon=-63.4083 Average Height 2.5 Albedo Factor 0.89 Diffuse Factor 0.97 Albedo Fraction 100 % **Horizon profile** Azimuth [°] -180 -121 -120 -118 -117 -64 -63 -61 -60 -59 -58 -56 Height [°] 0.0 0.0 1.0 1.0 2.0 2.0 3.0 3.0 4.0 4.0 5.0 5.0 Azimuth [°] -55 26 27 30 32 59 60 123 124 167 168 179 6.0 6.0 5.0 Height [°] 5.0 3.0 3.0 2.0 2.0 1.0 1.0 0.0 0.0 **Sun Paths (Height / Azimuth diagram)** 90 $1:22$ June 2: 22 May and 23 July 3: 20 Apr and 23 Aug 4: 20 Mar and 23 Sep 75 5: 21 Feb and 23 Oct 6: 19 Jan and 22 Nov $12h$ $13h$ 7: 22 December କ $11h$ $\overline{2}$ $14h$ 60 10_h 3 $15h$ Sun height^{[°}] $9h$ 45 $16h$ 8_h 17_h 30 6 $18h$ -6h 15 19 -120 -90 -60 -30 $\pmb{\mathsf{o}}$ 30 60 90 120 Azimuth [°]

with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 3 - 10 MW - Monofacial - SAT

Sargent & Lundy LLC (United States)

Main results

System Production

Produced Energy Apparent energy

18 GWh/year 19294 MVAh

Specific production Performance Ratio PR

1406 kWh/kWp/year 88.26 %

Balances and main results

Legends

PVsyst V7.2.12 VC2, Simulation date: 27/09/22 11:03 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 3 - 10 MW - Monofacial - SAT

Sargent & Lundy LLC (United States)

Loss diagram

6.16 kVAR Reactive energy to the grid: Aver. cos(phi) = 0.948 **19.29 kVA Apparent energy to the grid**

Project: PEI - Solar PV Feasibility

Variant: Case 3 - 10 MW - Monofacial - SAT

Sargent & Lundy LLC (United States)

PVsyst - Simulation report

Grid-Connected System

Project: PEI - Solar PV Feasibility Variant: Case 4 - 10 MW - Bifacial - SAT Unlimited Trackers with backtracking System power: 13.01 MWp Prince Edward Island - Canada

> **Author** Sargent & Lundy LLC (United States)

PVsyst V7.2.12 VC3, Simulation date: 27/09/22 11:11 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 4 - 10 MW - Bifacial - SAT

Sargent & Lundy LLC (United States)

Project summary Geographical Site Prince Edward Island Canada **Situation** Latitude Longitude Altitude Time zone 46.34 °N -63.41 °W 92 m UTC-4 **Project settings** Albedo 0.20 **Meteo data** Prince Edward Island Meteonorm 8.0 (1991-2005), Sat=100% - Synthetic **System summary Grid-Connected System** Simulation for year no 1 **Unlimited Trackers with backtracking PV Field Orientation Orientation** Tracking horizontal axis **Tracking algorithm** Astronomic calculation Backtracking activated **Near Shadings** No Shadings **System information PV Array** Nb. of modules Pnom total 22624 units 13.01 MWp **Inverters** Nb. of units Pnom total Grid power limit Grid lim. Pnom ratio 13 units 10.92 MWac 10000 kWac 1.301 **User's needs** Unlimited load (grid) **Results summary** Produced Energy Apparent energy 20 GWh/year 20673 MVAh Specific production 1506 kWh/kWp/year Perf. Ratio PR 94.58 % **Table of contents** Project and results summary General parameters, PV Array Characteristics, System losses 2 3

Horizon definition Main results Loss diagram Special graphs

PVsyst V7.2.12 VC3, Simulation date: 27/09/22 11:11 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 4 - 10 MW - Bifacial - SAT

Sargent & Lundy LLC (United States)

Modules

707 Strings x 32 In series

PVsyst V7.2.12

VC3, Simulation date: 27/09/22 11:11 with v7.2.12

Variant: Case 4 - 10 MW - Bifacial - SAT

Sargent & Lundy LLC (United States)

System losses

Auxiliaries loss

Proportionnal to Power 0.0 kW from Power thresh. 3.0 W/kW

PVsyst V7.2.12 VC3, Simulation date: 27/09/22 11:11 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 4 - 10 MW - Bifacial - SAT

Sargent & Lundy LLC (United States)

AC losses in transformers MV transfo Medium voltage 34.5 kV **Operating losses at STC** Nominal power at STC Iron loss (24/24 Connexion) Loss Fraction Coils equivalent resistance Loss Fraction 12813 kVA 4.27 kW/Inv. 0.10 % at STC 3 x 0.74 mΩ/inv. 0.80 % at STC **HV transfo** Grid voltage 138 kV **Transformer from Datasheets** Nominal power Iron loss Loss Fraction Copper loss Loss Fraction 15000 kVA 7.00 kVA 0.05 % of PNom 55.00 kVA 0.37 % of PNom **Operating losses at STC** Nominal power at STC Iron loss (24/24 Connexion) Loss Fraction Coils equivalent resistance Loss Fraction 12813 kVA 7.00 kW 0.05 % at STC 3 x 291.0 mΩ 0.31 % at STC

Project: PEI - Solar PV Feasibility

Variant: Case 4 - 10 MW - Bifacial - SAT

Sargent & Lundy LLC (United States)

PVsyst V7.2.12 VC3, Simulation date: 27/09/22 11:11 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 4 - 10 MW - Bifacial - SAT

Sargent & Lundy LLC (United States)

Main results

System Production

Produced Energy Apparent energy

20 GWh/year 20673 MVAh

Specific production Performance Ratio PR

1506 kWh/kWp/year 94.58 %

Balances and main results

Legends

VC3, Simulation date: 27/09/22 11:11 with v7.2.12

Project: PEI - Solar PV Feasibility

Variant: Case 4 - 10 MW - Bifacial - SAT

Sargent & Lundy LLC (United States)

Project: PEI - Solar PV Feasibility

Variant: Case 4 - 10 MW - Bifacial - SAT

Sargent & Lundy LLC (United States)

APPENDIX D

Sargent and Lundy Extreme Weather Event Capacity Impact Adddendum to Capacity Resource Study

July 21, 2023

Island Regulatory and Appeals Commission **PO Box 577** Charlottetown PE C1A 7L1

Dear Commissioners:

Please find attached the Addendum to the December 2022 Maritime Electric Capacity Resource Study. The Addendum highlights the capacity impact of the February 3 to 5, 2023 extreme weather event. The purpose of the Addendum is to revisit and revise some of the recommendations made in the December 2022 report in light of the polar vortex that occurred in the Maritimes and Quebec.

The event highlighted that i) PEI is more susceptible to mainland electricity import interruptions or curtailments than originally assumed, and ii) Maritime Electric's peak load is higher than previously forecasted during the preparation of the December 2022 report.

Sargent & Lundy is of the opinion that the events that transpired on February 3 to 5, 2023 should serve as an early warning example of the challenges PEI faces with respect to potential electricity disruptions during extreme weather events. Also, regardless of whether global warming is found to increase the rate and/or severity of polar vortex disruptions in the future, extreme cold weather events already occur with sufficient regularity that proper planning of the electrical system is essential, especially when considering the growth of electric heating throughout the Maritimes.

The Addendum also provides previous examples of cold weather events contributing to the failure of electrical systems in Texas and Newfoundland where insufficient generation capacity, combined with both a peak load that surpassed the forecast and untimely system equipment failure, resulted in loss of life, major system disruptions and blackouts.

Fortunately, PEI was able to get through the events of February 3 to 5, 2023 without having to implement load shed due to electricity shortages. However, in many respects, PEI was in the most precarious position of any location within the entire region. This is because PEI does not have enough dispatchable capacity installed on-Island to fully meet peak load and thus required continuous imported electricity from New Brunswick in order to avoid load shed. While the wind generation installed on PEI is an excellent resource from the perspective of lowering carbon emissions, wind generation is not a dispatchable resource in an emergency.

This was evident during the extreme cold event as only 25 per cent of the turbines were operational at the time of peak load and the remainder were in forced or planned outage. PEI was fortunate that ISO New England, Newfoundland and Labrador, and Nova Scotia had small amounts of excess electricity to send to New Brunswick.

On May 15, 2023, NERC (North American Electric Reliability Corporation) released a Level 3 Essential Actions Alert titled Cold Weather Preparations for Extreme Weather Events III. Level 3 essential actions alert is the highest severity level that NERC issues and this is the first time a Level 3 essential actions alert has ever been issued by NERC. The assessments and recommendations from NERC illustrate that many parts of North America are at risk during extreme cold weather events. Among the locations facing the greatest challenges is Canada's Maritime Provinces region. For PEI, this is an indication that electricity imports from the mainland are not guaranteed during future extreme cold events.

Due to the shortage in dispatchable resources seen during the February 2023 event, Sargent & Lundy revised its previous recommendations to Maritime Electric of installing a minimum of 85 MW of new reciprocating internal combustion engine ("RICE")/combustion turbine ("CT") with biofuel compatibility to a higher range of 125 to 150 MW of the same technology. This recommendation is based on the Maritime Electric record peak load of 359 MW experienced on February 4, 2023. Sargent & Lundy continues to recommend the integration of both onshore wind and solar photo voltaic to help meet Maritime Electric's decarbonization goals but notes that these non-dispatchable resources may not be available to provide reliable generation during an emergency event as was experienced during the February 3-5, 2023. In addition, Sargent and Lundy continues to note that a new battery energy storage system ("BESS") demonstration project could help identify the BESS functions/use cases that offer the maximum benefit for the Island.

Yours truly,

MARITIME ELECTRIC

linger Oxford

Angus S. Ørford Vice President, Corporate Planning & Energy Supply

ASO04 Enclosure

Extreme Weather Event Capacity Impact

Addendum to December 2022 Maritime Electric Capacity Resource Study

Prepared for Maritime Electric Company, Ltd.

Prepared by Sargent & Lundy

Report SL-017775 Final July 12, 2023 Project 14782.002

55 East Monroe Street Chicago, IL 60603-5780 USA 312-269-2000 www.sargentlundy.com

L E G A L N O T I C E

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Sargent & Lundy is one of the longest-standing full-service architect engineering firms in the world. Founded in 1891, the firm is a global leader in power and energy with expertise in grid modernization, renewable energy, energy storage, nuclear power, fossil fuels, carbon capture, and hydrogen. Sargent & Lundy delivers comprehensive project services – from consulting, design, and implementation to construction management, commissioning, and operations/maintenance – with an emphasis on quality and safety. The firm serves public and private sector clients in the power and energy, gas distribution, industrial, and government sectors.

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ISSUE SUMMARY AND APPROVAL PAGE

This is to certify that this document has been prepared, reviewed, and approved in accordance with Sargent & Lundy's Standard Operating Procedure SOP-0405, which is based on ANSI/ISO/ASSQC Q9001 Quality Management Systems.

Contributors

Prepared by:

Reviewed by:

Approved by:

Matthew Thibodeau Senior Vice President July 12, 2023

Date

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A C R O N Y M S A N D A B B R E V I A T I O N S

E X E C U T I V E S U M M A R Y

On December 9, 2022, Sargent & Lundy (S&L) issued a report titled *Capacity Resource Study: Evaluation of Various Technology Options for Maritime Electric Company*, which included an evaluation of different electricity capacity resource technologies, cost estimates, and recommend technologies well suited to helping Maritime Electric Company, Limited (MECL) meet its goals and needs. MECL's most important goals include meeting capacity and energy obligations, improving its ability to serve load during interruptions in electricity, and achieving environmental sustainability targets. The report ultimately concluded that a portfolio of reciprocating internal combustion engines (RICE) / combustion turbines (CTs), onshore wind, and solar photovoltaic was best suited to help MECL meet these goals. Based on a review of MECL's forecasted peak load at the time the previous report was written, S&L originally recommended that a minimum of 85 MW of new RICE/CTs with biofuel compatibility should be installed on Prince Edward Island (PEI) as soon as possible to reduce the probability of load shedding and rolling blackouts in the event of electricity import limits and/or interruptions from the mainland. In addition, while S&L's report did not recommend a new battery energy storage system (BESS) as part of the recommended portfolio, S&L noted that a new BESS could provide some benefits for MECL and PEI. As a result, S&L's report suggested that a new BESS demonstration project could be pursued, potentially in coordination with interested PEI stakeholders, to better assess the BESS functions/use cases that offer the maximum benefit for the island.

The purpose of this addendum is to revisit and revise some of the recommendations made in the prior report based on the observations made during a recent extreme cold event that transpired in the Maritimes region between February 3 through 5, 2023. The recent event highlighted both that (1) PEI is more susceptible to mainland electricity import interruptions or curtailments than originally assumed and (2) MECL's peak load is higher than previously forecasted during the preparation of the prior report.

EXTREME COLD WEATHER EVENT ON FEBRUARY 3 TO 5, 2023

During the period between February 3 and 5, 2023, large areas of Eastern Canada and the Maritimes provinces experienced extreme cold, driven by the disrupted southward movement of the northern polar vortex. This caused wind temperatures and wind chills to drop to below -40°C, as shown in [Figure ES-1.](#page-482-1)

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Figure ES-1 — Temperature and Wind Chill, Charlottetown (Feb. 3 to 5, 2023)

IMPACT TO PEI AND REGIONAL ELECTRICAL SYSTEMS

The extreme cold weather during February 3 to 5, 2023, caused record high demand for electricity on PEI and throughout Eastern Canada due to increased home heating load, commercial / industrial loads, and electrification. The high load resulted in significant stress on the electrical system, both locally and regionally. PEI experienced record electrical demand, with peak load for PEI soaring to 395.7 MW. This exceeded the previous load peak for PEI (set in 2022) by 22.5%.

Figure ES-2 — Electrical Load on PEI (Feb. 3 to 5, 2023)

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This higher peak load experienced by PEI and in other parts of the Maritimes provinces, along with the stress the extreme weather had on other aspects of the electrical system (i.e., on generation and electrical equipment performance), resulted in a significant impact to grid operations and overall system reliability. The system's total hourly dispatch through the extreme cold event, in addition the wind generation through the event, are shown in [Figure ES-3](#page-483-0) and [Figure ES-4.](#page-484-0) Given there is only enough dispatchable generation installed on PEI to meet a fraction (approximately 20%) of the peak electrical load experienced on PEI during the event, significant electricity imports from New Brunswick were required to meet PEI's electricity demand during the event. New Brunswick was able to provide imports with minimal curtailment; however, margins in New Brunswick were also very thin—to the point where New Brunswick had to declare an Energy Emergency Alert Level 2, which indicates that it was at serious risk of being unable to meet its firm load requirements (discussed further below). In addition, during the event the wind generation on PEI dropped significantly due to both the cold temperatures and high wind speeds resulting in equipment failures/shutdowns. PEI's relatively small amount of on-island dispatchable generation was dispatched without issue during the event.

Figure ES-3 — PEI Generation by Source (Feb. 3 to 5, 2023)

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Figure ES-4 — PEI Wind Generation and Wind Speed (Feb. 3 to 5, 2023)

The extreme cold weather event severely strained the broader Maritimes regional electric system to the point where load shedding was a significant risk. [Figure ES-5](#page-485-0) summarizes the regional shortfalls, key electricity import/exports, and declared emergencies during the event. The provinces of Québec, Newfoundland and Labrador, Nova Scotia, and New Brunswick were all significantly impacted. Québec had to declare an Energy Emergency Alert Level 2 emergency and both (1) completely curtailed electricity exports to New Brunswick and (2) purchased emergency energy from New England, New York, and Ontario. As a result of the drop in electricity imports from Québec, in addition to record high peak electrical load, the New Brunswick electrical system was also pushed to emergency levels. Several factors, including electricity imports from ISO New England and Newfoundland and Labrador (through Nova Scotia), helped New Brunswick to avoid load shed. Had these imports not been available, it is likely that New Brunswick would have had to more significantly curtail electricity exports to PEI, which would likely have resulted in load shed on PEI during some of the coldest parts of the extreme cold event.

Figure ES-5 — Regional Recap, Evening February 3, Morning February 4, 2023

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SIMILAR RECENT EVENTS AND INDUSTRY GUIDANCE

The extreme cold weather event that hit Eastern Canada on February 3 to 5, 2023, had many similarities to other recent events that also resulted in excessive strain on electric systems. The most notable recent event took place in 2021, when extreme cold from the North Pole pushed southward into the United States, all the way into Texas. In Texas, the cold also resulted in very high demand for electricity, disruptions to generators and the supply of natural gas, widespread power outages, and water shortages. The crisis led to billions in dollars of damage and the deaths of 246 people, two-thirds of which died from hypothermia.²

Given the stress recent extreme cold weather events have put on electrical systems, the North American Electric Reliability Corporation (NERC) has released a set of planning guidelines and recommendations regarding extreme cold weather events to come. For example, in November 2022, NERC released its *2022-* 2023 Winter Reliability Assessment,³ which highlighted that "some areas [of the bulk power system] are highly vulnerable to extreme and prolonged cold weather and may require load-shedding procedures to maintain reliability." The guideline notes that during extreme cold events, the Maritimes region is likely to have the second lowest electrical system reserve margins of all the electrical systems NERC oversees (see [Figure ES-6](#page-487-1) taken from the NERC guideline). Only Texas is estimated to have lower reserve margins. For PEI, this is an indication that electricity imports from the mainland to PEI are not guaranteed during future extreme cold events. Note that the reason for the estimated tight reserve margins in the Maritimes region is electrical load growth, which is driven by the rapid transition of buildings to electrical heating (and electrification in general) and commercial / industrial load.

In addition, on May 15, 2023, NERC released a Level 3 Essential Actions Alert titled *Cold Weather Preparations for Extreme Weather Events III.*⁴ The alert was issued to "increase the Reliability Coordinators' (RC), Balancing Authorities' (BA), Transmission Operators' (TOP), and Generator Owners' (GO) readiness and enhance plans for, and progress toward, mitigating risk for the upcoming winter and beyond." For reference, a Level 3 Essential Actions Alert is the highest severity level that NERC issues and this is the first time a Level 3 Essential Actions Alert has ever been issued by NERC.

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² https://www.texastribune.org/2022/01/02/texas-winter-storm-final-death-toll-246/

³ https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2022.pdf ⁴https://www.nerc.com/news/Pages/NERC-Releases-Essential-Action-Alert-Focused-on-Cold-Weather-Preparations.aspx

UPDATED RECOMMENDATIONS FOR MECL

Due to the shortage in dependable resources seen during the February 2023 event, S&L has revised its previous recommendation to MECL of installing a minimum of 85 MW of new RICE/CTs with biofuel compatibility to a higher range of 125 to 150 MW of the same technology. This recommendation is based on the record peak load of 395.7 MW experienced on February 4, 2023. S&L continues to recommend the integration of both onshore wind and solar photovoltaic to help meet MECL's decarbonization goals but notes that these non-dispatchable resources may not be able to provide reliable generation during an emergency event (as was observed during the event between February 3 and 5, 2023). In addition, S&L continues to note that a new BESS demonstration project could help identify the BESS functions/use cases that offer the maximum benefit for the island. As is shown in [Figure ES-7,](#page-488-0) an additional 125 to 150 MW of dispatchable capacity (RICE/CTs) would help to keep the ratio of dispatchable capacity to system peak

⁵ https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2022.pdf

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load, and thus risk of future load shed in the event of mainland electricity import shortages, near consistent with historical levels.

Figure ES-7 — Outlook of Dispatchable On-Island Capacity versus Peak Load

[Table ES-1](#page-488-1) summarizes the key operating details and levelized costs for CT and RICE options. A more detailed estimate of the CT design is included in [Appendix A](#page-516-0) with the RICE details included in the previous report. Note the manufacturer and type of CT/RICE unit are chosen for comparison purposes only—many other manufacturers make similar units.

There is also a need on PEI for additional electrical system support to maintain voltage levels and system stability, which is an ongoing challenge on PEI as additional wind generation is added to the electrical system. The 2020 MECL Integrated System Plan noted that after island load exceeds 350 MW, additional

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system voltage support (i.e., a synchronous condenser) will be needed on PEI⁶. Previous forecasts of island load estimated that levels higher than 350 MW would not be reached for a number of years; however, given PEI's load nearly reached 400 MW on February 4, 2023, additional system voltage support is needed today. For reference, both RICE and CTs can operate as synchronous condensers, which would help to improve the system's electrical performance; however, CTs are much more commonly used as synchronous condensers than RICE in the electricity industry. As a result, S&L recommends MECL pursue CTs over RICE if it is determined that a unit with synchronous condenser capability is required.

Finally, due to the unavailability of many of the wind generators on PEI during the February 3 to 5, 2023, event (as a result of equipment shutdowns caused by both the extreme cold and strong/turbulent winds), S&L recommends further information sharing and/or a technical conference, between MECL, the wind operators, and the wind generator original equipment manufacturers to fully understand what transpired and find solutions to prevent a repeat of the challenges experienced between February 3 and 5, 2023.

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⁶ Maritime Electric 2020 Integrated System Plan, page 44 and 47

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1 . I N T R O D U C T I O N A N D E V E N T D E S C R I P T I O N

On December 9, 2022, Sargent & Lundy (S&L) issued the *Capacity Resource Study: Evaluation of Various Technology Options for Maritime Electric Company,* report number SL-017203. The report was developed for the purposes of evaluating a variety of different electricity capacity resource technologies, developing cost estimates, and recommending technologies well suited to help Maritime Electric Company, Limited ("MECL" or "Maritime Electric") cost-effectively achieve its most critical goals and needs, which are described as follows:

- 1. Meet both its capacity and energy obligations
- 2. Improve its ability to serve load during interruptions and/or curtailments in electricity imported from the mainland
- 3. Achieve sustainability targets

The report ultimately concluded that a portfolio of reciprocating internal combustion engines (RICE) / combustion turbines (CTs), onshore wind, and solar photovoltaic was best suited to help Maritime Electric meet these goals and needs. Based on a review of Maritime Electric's forecasted peak load at the time the report was written, S&L originally recommended that a minimum of 85 MW of new RICE/CTs with biofuel compatibility should be installed on Prince Edward Island (PEI) as soon as possible to reduce the probability of load shedding and rolling blackouts in the event of electricity import limits and/or interruptions from the mainland. Since the PEI system is winter peaking (i.e., the highest annual electricity demand occurs in the winter due to the demands of electric heating), in addition to the fact that winter in the Maritimes region can be particularly harsh, any load shed or rolling blackout events on PEI in the winter could have serious consequences both in terms of property damage and resident safety.

In addition, while S&L's report did not recommend a new battery energy storage system (BESS) as part of the recommended portfolio, S&L noted that a new BESS could provide some benefits for MECL and PEI. As a result, S&L's report suggested that a new BESS demonstration project could be pursued, potentially in coordination with interested PEI stakeholders, to better assess the BESS functions/use cases that offer the maximum benefit for the island.

The purpose of this addendum is to revisit and revise some of the recommendations made in the prior report based on the observations made during a recent extreme cold event that transpired in the Maritimes region between February 3 through 5, 2023. The recent event highlighted both that (1) PEI is more susceptible to mainland electricity import interruptions or curtailments than originally estimated when the prior report was written and (2) Maritime Electric's peak load is higher than what was previously forecasted. S&L is of the opinion that the events that transpired on February 3 to 5, 2023, should serve as an early

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warning example of the challenges PEI faces with respect to potential electricity disruptions during future extreme weather events.

1.1. EXTREME COLD WEATHER BETWEEN FEBRUARY 3 AND 5, 2023

During the period between February 3 and 5, 2023, large areas across Eastern Canada and the Maritimes provinces experienced extreme cold. [Figure 1-1](#page-491-2) illustrates the temperature and wind chill experienced in Charlottetown, PEI, between February 3 and 5, 2023. During the event, temperatures and wind chill values dipped significantly, with wind chill values falling to under -40°C. The high winds experienced across Eastern Canada and the Maritimes provinces drove the very low wind chill values, which also resulted in record electrical demand (as is shown in [Figure 2-1\)](#page-496-2) as residents heated their homes.

Figure 1-1 — Temperature and Wind Chill, Charlottetown (Feb. 3 to 5, 2023) 7,8

1.1.1. Extreme Cold and the Atmospheric Polar Vortex

The extreme cold in Eastern Canada that occurred between February 3 and 5, 2023, was the result of a disrupted polar vortex, which resulted in extremely cold air over the North Pole migrating southward. For reference, the polar vortex is a circulating mass of frigid air that is typically centered over the Earth's poles, held in place by strong jet stream air currents. In the event the jet stream air currents holding the frigid air over the Earth's poles weaken or fluctuate, the polar vortex can become disrupted and migrate towards the equator. [Figure 1-2](#page-492-0) helps to illustrate both stable and disrupted polar vortex atmospheric conditions.

⁷ https://www.wunderground.com/history/daily/ca/charlottetown/CYYG/date/2023-2-3

⁸ https://www.wpc.ncep.noaa.gov/html/windchill.shtml

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Figure 1-2 — Polar Vortex Illustration⁹

As a result of the overall warming trend of the Earth, there is significant research ongoing by atmospheric and climate scientists as to whether more frequent and/or pronounced disruptions in the polar vortex will occur in the future, which could result in more extreme cold temperatures at southern latitudes during winter months. Some evidence suggests that frequent disruptions could be expected in the future. In S&L's opinion, regardless of whether global warming is found to increase the rate and/or severity of polar vortex disruptions in the future, extreme cold weather events already occur with sufficient regularity that proper planning and cold weather hardening of the electrical system is essential, especially when considering the growth of electric heating throughout the Maritimes region and Canada.

Listed below are notable recent extreme cold weather events for illustrative purposes. As can be seen, these events occur regularly.

- February 2023: The most recent extreme cold weather event and the subject of this report.
- December 2022: During the end of 2022, storms and a cold weather snap gripped much of North America, resulting in many record low temperatures across the continent and power outages across Canada and the United States.
- February 2021: This extreme cold event resulted in significant damage and loss of life across North America, with the state of Texas' electrical system suffering from widespread outages. This recent event, specifically what transpired in Texas, is discussed in detail in the following subsection.
- January 2019: This significant cold weather event struck Canada bringing both record snowfalls and cold weather to many provinces. Wind chills in parts of Ontario (both Toronto and Windsor), Manitoba, Saskatchewan, Alberta, and British Columbia approached -40°C during this event. Extreme cold temperatures also stretched into the United States, with the state of Michigan declaring

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⁹ https://www.climate.gov/news-features/understanding-climate/understanding-arctic-polar-vortex

a state of emergency due to the record cold temperatures and wind chills in the city of Chicago, Illinois, dropping to nearly -50°C.

• January 2014: Extreme cold weather and winter storms hit much of Eastern Canada and the United States, resulting in significant damage. High electrical demand as a result of the low temperatures, in addition to electrical equipment failures, resulted in the collapse of the electrical system in Newfoundland, where many residents were left without power for days. This event is described further in the following subsection.

1.2. ELECTRICAL SYSTEM FAILURES FROM EXTREME WEATHER

As is further described in Sections [2](#page-496-0) and [3,](#page-502-0) the extreme cold weather event experienced in the Maritimes region between February 3 to 5, 2023, very nearly resulted in significant load shed across Eastern Canada, including on PEI. Two previous events where cold weather contributed to the failure of electrical systems are described below.

1.2.1. 2021 Texas Electrical System Failure

The 2021 Texas electrical system failure occurred as a result of a severe winter weather polar vortex event that pushed south into Texas for several days in February 2021, resulting in widespread power outages, water shortages, and other disruptions. The crisis was caused by a combination of factors, including extreme cold temperatures, high demand for electricity, insufficient electrical equipment winterization, and disruptions in the supply of natural gas.

Temperatures in the state dropped to a low of -19°C during the event, ¹⁰ which was the coldest temperature reached in over seven decades in some parts of the state, and the freezing temperatures lasted for up to eight days in some areas. The event had a significant impact on the state's electric grid, which is managed by the Electric Reliability Council of Texas. The extreme cold caused a surge in demand for electricity as people tried to keep their homes warm, while at the same time the extreme cold resulted in many power plants and natural gas facilities failing to operate. Much of the electrical and natural gas equipment in Texas was not winterized sufficiently, which resulted in frozen wind turbines, mechanical failures at natural gas plants, as well as fuel supply shortages, all of which crippled the generation capacity of the Electric Reliability Council of Texas.

The effects were far-reaching and profound. Approximately 4.5 million homes and businesses were left without power.^{11,12} Many Texans were without power for days, and some were forced to resort to unsafe

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¹⁰https://www.dallasnews.com/news/weather/2021/02/16/thousands-still-without-power-as-north-texas-reachesrecord-low-temperature/

¹¹https://www.nbcnews.com/news/weather/knocked-out-texas-millions-face-record-lows-without-power-newn1257964

¹² https://time.com/5940232/millions-without-power-texas/

methods to stay warm—approximately 246 people lost their lives during the event, of which two-thirds died from hypothermia.¹³ The freezing temperatures also caused water pipes to burst, leading to water shortages in some areas. Some residents had to boil water or rely on bottled water for drinking and cooking. It is estimated that the event caused nearly \$200 billion in damage.¹⁴

While PEI did not experience load shed during the recent February 3 to 5, 2023, extreme cold event, PEI came extremely close to being unable to meet load; thus, it is instructive to consider the many parallels between Texas and PEI, highlighted below.

- The Texas's power grid (Electric Reliability Council of Texas) is designed to operate independently from the rest of the grid in the United States, effectively making the Electric Reliability Council of Texas an "island" that has very limited access to additional generating resources from other states in the United States during times of crisis. This resulted in Texas being unable to import emergency power from its neighbors during the 2021 polar vortex event. Because PEI is an island with both (1) a limited interconnection to the mainland (via New Brunswick) and (2) an insufficient amount of dispatchable on-island generating capacity to fully meet its own electrical load, PEI nearly was unable to fully meet electrical demand during the cold weather event between February 3 and 5, 2023. As is further described in Sections [2](#page-496-0) and [3,](#page-502-0) PEI's mainland neighbors were nearly unable to meet their own load; thus, there was a significant risk that New Brunswick would have been forced to curtail electricity exports to PEI between February 3 and 5, 2023.
- The high demand for electricity in both Texas and recently on PEI (see Section [2\)](#page-496-0) during the cold events was driven primarily by home heating, highlighting the need to plan for higher winter demand as in-home electric heating demand increases.
- Texas experienced the shutdown of many wind generators due to the freezing temperatures, stressing a need to further examine potential weatherization solutions to prevent turbines from freezing in future. As is discussed in Section [2,](#page-496-0) PEI also experienced a similar drop in wind turbine generation during the recent extreme cold event between February 3 and 5, 2023.

1.2.2. 2014 Newfoundland System Outages

During the period of January 2 to 8, 2014, Newfoundland experienced significant power outages following a winter storm and associated very cold weather. Investigations on the cause of the outages determined that they stemmed from two primary reasons: 15

- An insufficiency of generating resources to meet customer demand
- A series of untimely system disruptions (electrical equipment failure, etc.)

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¹³ https://www.texastribune.org/2022/01/02/texas-winter-storm-final-death-toll-246/

¹⁴ https://www.austintexas.gov/sites/default/files/files/HSEM/2021-Winter-Storm-Uri-AAR-Findings-Report.pdf ¹⁵http://www.pub.nf.ca/applications/IslandInterconnectedSystem/index.htm, Liberty Report - addressing Newfoundland and Labrador Hydro

During the event, the shortages in available generation required the province's utility to implement unprecedented rotating power outages. At the height of the event, nearly 200,000 customers in total were without power,¹⁶ with some areas remaining in the dark for several days. The outages also affected critical infrastructure such as hospitals and water treatment facilities, leading to concerns about public health and safety. The storm also resulted in damage to power lines on the island, which further contributed to outages in Newfoundland. Thankfully, despite the severity of the storm and the cold temperatures, there were no deaths or serious injuries reported as a result of the power outages.

The assessment of the event showed that insufficient generation capacity, combined with both a peak load that surpassed the forecast and untimely system equipment failure, resulted in major system disruptions and blackouts. PEI is in a similar position to Newfoundland due to the fact that both islands have limited interconnections to neighbors. In addition, similar to Newfoundland, PEI is unable to fully meet its own electrical load with dispatchable on-island generation. As a result, it is not unlikely that the events that transpired between January 2 to 8, 2014, on Newfoundland could occur on PEI.

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¹⁶https://www.theglobeandmail.com/news/national/newfoundland-closes-schools-as-power-outage-enters-fourthday/article16203471/

2 . E L E C T R I C A L S Y S T E M I M P A C T – P E I

The extreme cold that hit Eastern Canada between February 3 and 5, 2023, resulted in a significant amount of stress on the electrical system both on PEI and throughout Eastern Canada in terms of high system load, generation disruptions, electricity import limitations, and load shed. This section focuses on the impacts to PEI, followed by a more general assessment of what transpired at the regional level in Section [3.](#page-502-0)

2.1. SYSTEM ELECTRICAL LOAD

The extreme cold weather experienced on PEI drove system electricity consumption levels to all-time records due to extremely high demand for electricity to heat homes and other buildings. Both PEI and MECL experienced record peak electrical load. Peak load for PEI soared to 395.7 MW (average between hours ending 17:00 and 18:00 on February 4, 2023, 399.2 MW instantaneously) and peak load for MECL hit a record high of 357 MW. [Figure 2-1](#page-496-2) illustrates the electrical load profile for PEI between February 3 and 5, 2023. As can be observed in [Figure 2-1,](#page-496-2) the peak load experienced on February 4, 2023, was 22.5% higher than the previous peak set in January 2022. 17

In the *Capacity Resource Study: Evaluation of Various Technology Options for Maritime Electric Company* issued by S&L on December 9, 2022, the electrical load that MECL serves was expected to increase in the coming years; however, peak load levels were not expected to rise to the levels experienced by MECL between February 3 and 5, 2023, for several years. As such, the recommendation for dispatchable capacity

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¹⁷ The previous peak load for PEI was 322.9 MW experienced between the hours of 17:00 and 18:00 on January 11, 2022.

that MECL should install in the near future has been revised upward from the previous recommendation of 85 MW to a range of 125 to 150 MW, depending on the peak load forecast. A further discussion of this recommendation is provided in Section [5.1.](#page-511-1)

2.2. SYSTEM DISPATCH

[Figure 2-2](#page-498-1) illustrates total system dispatch by source during the period from February 3 through February 5, 2023. As is illustrated in [Figure 2-2,](#page-498-1) electrical load on PEI was primarily met via imports from New Brunswick during the event. Wind generation was initially high on February 3, 2023; however, wind generation fell significantly throughout the event due to the extreme cold and high wind speeds experienced. Since the contract with New Brunswick is for a maximum of 300 MW, MECL chose to operate its dispatchable thermal generation installed on PEI to stay under this limit or risk curtailments from New Brunswick (New Brunswick did have to partially curtail imports to PEI by 50 MW on the evening of February 3, 2023). MECL's CTs also provided additional benefits such as voltage control and transformer offloading that enabled higher grid stability during this time. The peak imported power from New Brunswick was approximately 290 MW on February 4, 2023, at approximately 16:00.

As is discussed further in Section [3.3,](#page-505-0) due to the challenges of operating its own system through the extreme cold temperatures, there was a significantly high risk that New Brunswick was not going to be able to export any electricity to PEI. The fact that New Brunswick was able to provide PEI with between 200 and 300 MW of imports through the event (with minimal curtailments of 50 MW) was very fortunate and saved PEI from having to shed firm load. It is also worth noting that PEI's peak occurred during the evening of February 4, 2023, while some of the other provinces had peaks that occurred earlier in the day. Thus, it is a reasonable conclusion that if PEI had a coincident peak with the other provinces, New Brunswick may not have been able to provide PEI with this critical imported power.

Figure 2-2 — PEI Generation by Source (Feb. 3 to 5, 2023)

2.2.1. Generator Performance During Event

2.2.1.1. Wind Generation

As the extremely cold temperatures hit PEI between the evening of February 3, 2023, and the morning of February 4, 2023, there was a subsequent sharp drop in wind generation. Going into the evening of February 3, 2023, it was reported that approximately 80% of the individual wind turbines on PEI were operational. By February 5, 2023, only about 25% of the individual wind turbines on PEI were operational (i.e., 75% were in forced or planned outage). [Figure 2-3](#page-499-0) and [Figure 2-4](#page-499-1) illustrate the historical PEI wind generation along with wind speed and ambient temperature during the cold weather event.

Figure 2-3 — PEI Wind Generation and Wind Speed (Feb. 3 to 5, 2023)

S&L had the opportunity to speak with the Wind Energy Institute of Canada (WEICAN) regarding the events that took place between February 3 and 5, 2023. WEICAN operates a number of wind turbine generators on PEI, some for research purposes. Per S&L's discussion with WEICAN, the drop in wind generation can be primarily tied to the following reasons:

• **Extreme Cold:** To avoid damage associated with extremely cold temperatures (which can cause equipment lubrication to harden, equipment material properties to change, etc.), wind turbine generators have safe shutdown setpoints that engage when temperatures drop below certain levels. A subset of the wind turbine generators that went offline on PEI experienced cold weather-related

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shutdowns. WEICAN explained that wind generators can be equipped with cold weather packages that allow the wind generators to operate at lower temperatures; however, the temperatures experienced on PEI were low enough to push the limits of even the wind generators equipped with cold weather packages.

• **Wind Speeds and Turbulence:** During the event, wind speeds (especially gusts) were very high, and the wind was turbulent. To avoid damage because of high wind speeds / high turbulence, wind turbine generators have safe shutdown setpoints that engage when wind speeds and/or turbulence rises above certain levels over a set period of time (i.e., over a 10-minute span). A subset of the wind generators that went offline on PEI experienced wind speed / turbulence-related shutdowns. If a wind generator goes into safe shutdown due to wind speed / turbulence, it is typically relatively easy to restart the generator again, once wind speeds / turbulence fall to levels low enough to safely operate the generator. However, this was not the case during the cold weather event in February because once the turbines went into shutdown, many quickly became too cold to easily restart. As a result, a subset of the turbines that went into shutdown due to high wind speeds / turbulence were unable to quickly restart and operate again because they were too cold.

As a result of the large drop in wind generation, MECL was forced to rely even more on imported electricity from New Brunswick, in addition to operating its limited amount of dispatchable thermal generation installed on PEI, to serve load. As is discussed in Section [3.3,](#page-505-0) there was a significantly high risk that New Brunswick was going to be forced to curtail electricity exports to PEI during the event; thus, the drop in wind generation could have resulted in load shed across PEI.

2.2.1.2. Dispatchable Thermal Generation

The dispatchable thermal generation installed on PEI, which includes the Borden CT1 and CT2 units, the Charlottetown CT3 unit, and the Summerside engines (which are not owned by MECL), ran without incident throughout the event, with units started during the evening of February 3, 2023, and operating until February 5, 2023. The following figure provides the total generation of the thermal generation installed on PEI through the cold weather event.

As discussed above, the generation from the thermal resources was used to help meet record peak loads and offset the drop in wind generation experienced during the cold weather event, which helped PEI to stay below the 300 MW import limit from New Brunswick. During the event, the CTs also provided voltage control and transformer offloading, both of which helped to keep the grid stable.

Figure 2-5 — PEI Dispatchable Thermal Generation (Feb. 3 to 5, 2023)

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3 . E L E C T R I C A L S Y S T E M I M P A C T – R E G I O N AL

The extreme cold weather experienced in Eastern Canada on February 3 through February 5, 2023, severely strained regional electrical systems to the point that load shedding was a significant risk. To illustrate the severity of what occurred, it is first important to understand the levels at which system emergencies are classified within electrical systems. Below are the different Energy Emergency Alert (EEA) levels, with EEA 3 being the most severe. During the event, both Québec and New Brunswick declared emergencies at an EEA 2 level. The following classifications are provided by the North American Electric Reliability Corporation (NERC)¹⁸.

- **EEA 1:** This is the first emergency level and is defined as "the balancing authority is experiencing conditions where all available generation resources are committed to meet firm load, firm transactions, and reserve commitments, and is concerned about sustaining its required contingency reserves." As part of EEA 1, non-firm wholesale energy sales have been curtailed.
- **EEA 2:** EEA 2 is defined as a situation where "the balancing authority is no longer able to provide its expected energy requirements and is an energy deficient balancing authority." Under an EEA 2 situation, the balancing authority still is able to maintain minimum contingency reserve requirements. A balancing authority experiencing an EEA 2 emergency is at serious risk of having to shed firm load and will take all potential steps possible to avoid firm load shed.
- **EEA 3:** Under an EEA 3 situation, the balancing authority is either currently shedding firm load or firm load shed is imminent. EEA 3 is the most serious of the EEA levels as it means there are or will be power outages / rolling blackouts.

[Figure 3-1](#page-503-0) provides an overview of the Maritimes region electrical system through the evening of February 3, 2023, and into the morning of February 4, 2023, which was the point at which the risk of load shed became the highest. Additionally, a brief overview of the challenges experienced within each area of the region is provided in the following subsections.

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¹⁸ https://www.nerc.com/pa/Stand/Reliability%20Standards/EOP-011-1.pdf

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Figure 3-1 — Regional Recap, Evening of February 3 and Early February 4, 2023

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3.1. QUÉBEC

The extreme cold drove electrical demand in Québec to record levels. That, in combination with generator operational challenges driven by the cold, resulted in Québec becoming energy deficient and needing to declare an EEA 2 level emergency. To serve its own system and avoid significant load shed, Québec curtailed exports to New Brunswick down to 0 MW. For reference, the export capacity from Québec to New Brunswick is approximately 1,000 MW, and real-time exports rising to this level is not uncommon. In addition, Québec purchased nearly 1,000 MW of emergency energy from ISO New England, in addition to electricity from New York and Ontario. For perspective, Québec is usually a net exporter of electricity to ISO New England and had not purchased energy from New England since 2016. ¹⁹ Since Québec is a very large and relied-upon producer of electricity in the region, the challenges experienced in Québec reverberated throughout the region.

During this time, Québec did not have excess generation capacity to spare and was thus unable to export any electricity to New Brunswick, even though the existing intertie is approximately 1,000 MW.

3.2. NEWFOUNDLAND AND LABRADOR

Newfoundland and Labrador is intertied to Nova Scotia via a sub-sea electrical cable system known as the Maritime Link. This linkage allows for the export of up to 500 MW of electricity from Newfoundland and Labrador to Nova Scotia. Between February 3 and 5, 2023, Newfoundland and Labrador was able to export over 200 MW of electricity to Nova Scotia, which helped to alleviate the electricity shortfalls throughout the region. One of the key reasons that Newfoundland and Labrador was able to export this electricity was because temperatures in Newfoundland and Labrador did not fall to the record lows experienced to the immediate south; thus, electrical demand in Newfoundland and Labrador was relatively lower than the record electrical demand levels experienced in Québec, Nova Scotia, New Brunswick, and PEI.

Throughout the event, a key concern related to Newfoundland and Labrador's ability to export electricity to Nova Scotia was the availability of the Labrador Island Link (LIL), a transmission line that connects Labrador, where the 824-MW Muskrat Falls hydroelectric generating station is located, to the island of Newfoundland. Availability of the LIL is essential to allow electricity generated in Labrador to flow to Newfoundland, where it can then be exported south into Nova Scotia. The island of Newfoundland alone does not have enough excess generation capacity installed to support significant export to Nova Scotia; if

¹⁹https://isonewswire.com/2023/04/06/winter-2022-2023-recap-wholesale-prices-drop-during-warm-season-markedby-cold-snaps/

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the LIL is out of service, generation from Labrador cannot flow into Newfoundland to be exported to Nova Scotia.

Historically, Newfoundland and Labrador Hydro, the operator of the Muskrat Falls generating station and the LIL, had estimated the forced outage rate of the LIL to be 0.0114%.²⁰ However, in late 2022, Newfoundland and Labrador Hydro issued a report titled *Reliability and Resource Adequacy Study Review; Reliability and Resource Adequacy Study – 2022 Update*, in which the previously estimated forced outage rate of the LIL was revised from 0.0114% to a range of between 1% and 10% (to be more precisely quantified at a later date), which equates to a reliability level that is approximately 100 times to 1,000 times less than previously estimated. Fortunately, the LIL was in service between February 3 and February 5, 2023. Had it been out of service during this time, the result would have been an increased likelihood of load shed on PEI during the coldest part of the event.

3.3. NEW BRUNSWICK

New Brunswick saw record electrical load levels between February 3 and 5, 2023, similar to the other Eastern Canada areas. New Brunswick Power indicated to MECL that their peak load hit a high of 3,395 MW on the morning of February 4, 2023, 62 MW higher than their previous peak electrical demand level of 3,333 set in January 2004. It is worth noting that high winds caused approximately 4,000 customers in New Brunswick to lose power on February 4, 2023, which resulted in peak electrical demand being about 20 MW lower than it would have been had those customers not been disconnected. In addition, New Brunswick Power had cut 130 MW of interruptible load. Combined with high load, New Brunswick also experienced similar drop-offs in wind generation to what was experienced on PEI, and some of New Brunswick's generators experienced operational challenges because of the extreme cold weather.

The most significant event that led to New Brunswick having to declare an emergency of level EEA 2 was Québec's need to stop the export of electricity to New Brunswick. The capacity of the interconnection between Québec and New Brunswick is significant at approximately 1,000 MW; thus, the lack of any imports from Québec pushed New Brunswick to the brink of having to further curtail electricity exports to PEI and to also shed load within New Brunswick. Fortunately, New Brunswick only had to curtail exports to PEI by 50 MW. Three of the most significant events that allowed New Brunswick to avoid more significant, or complete, curtailment of exports to PEI were the following:

²⁰ Link to the recently released *Reliability and Resource Adequacy Study Review*

Reliability and Resource Adequacy Study – 2022, released by Newfoundland and Labrador Hydro in October 2022: UpdateR[ehttp://www.pub.nf.ca/applications/NLH2018ReliabilityAdequacy/correspondence/From%20NLH%20-](http://www.pub.nf.ca/applications/NLH2018ReliabilityAdequacy/correspondence/From%20NLH%20-%20Reliability%20and%20Resource%20Adequacy%20Study%20-%202022%20Update%20-2022-10-03.PDF) [%20Reliability%20and%20Resource%20Adequacy%20Study%20-%202022%20Update%20-2022-10-03.PDF](http://www.pub.nf.ca/applications/NLH2018ReliabilityAdequacy/correspondence/From%20NLH%20-%20Reliability%20and%20Resource%20Adequacy%20Study%20-%202022%20Update%20-2022-10-03.PDF)

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- 1. **Electricity Imported from ISO New England**: This electricity proved to be essential, and it allowed New Brunswick to continue to export electricity to PEI. It was fortunate that ISO New England was able to provide electricity to New Brunswick because New England also faces challenges (primarily related to fuel supply) in the face of extreme cold weather events. These challenges are highlighted in recent NERC guidance and further described in Section [4](#page-509-0) of this report.
- **2. Electricity Imported from Nova Scotia and Newfoundland and Labrador:** The electricity that Nova Scotia was able to provide to New Brunswick also helped New Brunswick continue to export electricity to PEI. Part of the reason that Nova Scotia was able to export electricity to New Brunswick was because Nova Scotia was able to import electricity from Newfoundland and Labrador via the Maritime Link, as discussed previously.
- 3. **Operation of the Thermal Resources on PEI:** The operation of the thermal generation located on PEI (all three MECL CTs and the Summerside engines) helped to generate approximately 80 MW of electricity from late February 3 through February 4, 2023, which were the most critical times during the extreme cold event. The thermal generation on PEI helped to partially offset the failure of the wind generation located on PEI that was experienced during the event. Without the generation from the thermal generators on PEI, the need for imported power would have been greater, increasing the risk from import curtailments.

3.4. ISO NEW ENGLAND

During the extreme cold event, ISO New England was able to serve as an essential import provider to both Québec and New Brunswick as both purchased significant amounts of electricity from ISO New England. Approximately 1,000 MW of electricity exports were sent to Québec and a peak of 400 MW of exports were sent to New Brunswick during the most critical times of the event. Real-time electricity prices soared to \$500/MWh on February 4, 2023, (typically prices are in the \$20 to \$40/MWh range) which is an indication that total electrical demand approached the available supply within ISO New England. ISO New England notes that demand would likely have been higher if February 3 through 5, 2023, had not been weekend days. 21

3.5. NOVA SCOTIA

Information regarding the electrical system challenges faced by Nova Scotia during the extreme cold weather event that transpired between February 3 and 5, 2023, mirrored much of which was experienced in the rest of the region. Nova Scotia's peak load experienced on February 4, 2023, was 10% higher than the previous peak experienced in 2004. As previously discussed, Nova Scotia was able to import electricity from Newfoundland and Labrador throughout the event, which helped to not only allow Nova Scotia to meet

²¹ https://isonewswire.com/2023/04/06/winter-2022-2023-recap-wholesale-prices-drop-during-warm-season-markedby-cold-snaps/

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system load, but also export some excess electricity to New Brunswick (which ultimately helped to avoid New Brunswick from further having to curtail PEI).

3.6. PRINCE EDWARD ISLAND

Fortunately, PEI was able to get through the events of February 3 through 5, 2023, without having to implement load shed due to electricity shortages. However, in many respects, PEI was in the most precarious position of any location within the entire region. This is because PEI does not have enough dependable capacity installed on the island to fully meet peak load and thus required continuous imported electricity from New Brunswick in order to avoid load shed. While the wind generation installed on PEI is an excellent resource from the perspective of lowering carbon emissions for the island, wind generation is not a dispatchable resource in an emergency. This was evident during the extreme cold event that took place as only 25% of the wind turbines were operational (i.e., 75% were in forced or planned outage) during the most critical, coldest time of the event. PEI was fortunate that ISO New England, Newfoundland and Labrador, and Nova Scotia had some small amount of excess electricity to send to New Brunswick during the event—without electricity from these locations, New Brunswick would have been forced to further or completely curtail electricity exports to PEI, which would have resulted in significant load shed on PEI.

In the *Capacity Resource Study: Evaluation of Various Technology Options for Maritime Electric Company*, issued by S&L on December 9, 2022, an important focus was related to a scenario where PEI is electrically disconnected from the mainland. Many of the recommendations in the study were rooted in that specific scenario, which has occurred infrequently in the past. The extreme cold weather event that transpired between February 3 and 5, 2023, illustrates a similar, but fundamentally different scenario—one where the interconnection between PEI and the mainland remains operational, but electricity shortages on the mainland result in the curtailment of electricity imports to PEI. In terms of impact to PEI, this scenario is essentially equivalent to a scenario where the interconnection to the mainland becomes inoperable—both scenarios are likely to result in electricity shortages on PEI and thus load shed.

One important point to note is that when a utility experiences a shortage of electrical generation, its first priority is to serve its own load, which may require the utility to cut exports (for example, Québec cut exports to New Brunswick during the February cold weather event so that it could meet its own electrical load). In the event that PEI's thermal generators and wind and solar power plants are unable to generate a sufficient amount of electricity to support PEI's load, which they did not during the February 2023 event, PEI is dependent on imported electricity from the mainland to serve load. As was demonstrated during the February 2023 event, MECL and the other utilities in the region will attempt to generate and secure enough electricity to fully serve regional load during an emergency event; however, if there is not enough generation

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in the region to fully serve load, the other regional utilities will first prioritize their own load over exporting electricity to PEI. In this situation, the risk for load shed on PEI is high, which would put the residents of PEI in danger.

4 . N E R C W I N T E R R E L I A B I L I T Y A S S E S S M E N T S

Given the stress recent extreme cold weather events have put on electrical systems, NERC has released a set of planning guidelines and recommendations regarding extreme cold weather events to come. For example, in November 2022, NERC released its *2022-2023 Winter Reliability Assessment, ²²* which highlighted that "some areas [of the bulk power system] are highly vulnerable to extreme and prolonged cold weather and may require load-shedding procedures to maintain reliability." The report is meant to inform industry leaders, planners, operators, and regulatory bodies to take necessary actions to ensure reliability. The guideline notes that during extreme cold events, the Maritimes region is likely to have the second lowest electrical system reserve margins of all the electrical systems NERC oversees (see [Figure](#page-510-0) [4-1](#page-510-0) taken from the NERC guideline). Only Texas is estimated to have lower reserve margins. The reason for the estimated tight reserve margins in the Maritimes region is electrical load growth, which is driven by the rapid transition of buildings to electrical heating (and electrification in general) and commercial / industrial load. In addition, NERC also notes that New England faces challenges during extreme cold events, primarily due to fuel supply constraints.

In addition, on May 15, 2023, NERC released a Level 3 Essential Actions Alert titled *Cold Weather Preparations for Extreme Weather Events III. ²³* The alert was issued to "increase the Reliability Coordinators' (RC), Balancing Authorities' (BA), Transmission Operators' (TOP), and Generator Owners' (GO) readiness and enhance plans for, and progress toward, mitigating risk for the upcoming winter and beyond." For reference, a Level 3 Essential Actions Alert is the highest severity level that NERC issues and this is the first time a Level 3 Essential Actions Alert has ever been issued by NERC.

The assessments and recommendations from NERC illustrate that many parts of North America are at risk during extreme cold weather events. Among the locations facing the greatest challenge is the Maritimes region. For PEI, this is an indication that electricity imports from the mainland to PEI are not guaranteed during future extreme cold events.

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²² https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2022.pdf ²³https://www.nerc.com/news/Pages/NERC-Releases-Essential-Action-Alert-Focused-on-Cold-Weather-Preparations.aspx

Figure 4-1 — NERC 2022–2023 Winter Reliability Assessment²⁴

2022-2023 Winter Reliability Assessment

NERC's annual Winter Reliability Assessment evaluates the generation resource and transmission system adequacy needed to meet projected winter peak demands and operating reserves as well as identifies potential reliability issues for the 2022-2023 winter period. Under normal or mild winter weather, the BPS has a sufficient supply of capacity resources. However, some areas are highly vulnerable to extreme and prolonged cold weather and may require load-shedding procedures to maintain reliability. Generators face heightened fuel risk for this winter due to railroad transportation uncertainty and global energy supply issues.

Key Actions

- . Cold Weather Preparations: Generators should, while considering NERC's cold weather preparations alert, prepare for winter conditions and communicate with grid operators.
- . Fuel: Generators should take early action to assure fuel and communicate plant availability. Reliability Coordinators and Balancing Authorities should monitor fuel supply adequacy, prepare and train for energy emergencies, and test protocols.
- · State Regulators and Policymakers: States regulators should preserve critical generation resources at risk of retirement prior to the winter season and support requests for environmental and transportation waivers. Support electric load and natural gas local distribution company conservation and public appeals during emergencies. In New England, the states should support fuel replenishment efforts using all means possible.

Percentages indicate the projected reserve margin with electricity demand, generation outages, and energy derates under extreme conditions.

Extreme Weather Risk

Winter weather conditions that exceed projections could expose power system generation and fuel delivery infrastructure vulnerabilities. Increased demand caused by frigid temperatures, coupled with higher than anticipated generator forced outages and derates, could result in energy deficiencies that require system operators to take emergency operating actions, up to and including firm load shedding.

Fuel Limitations During Extended Cold

Limited natural gas infrastructure can impact winter reliability due to increased heating demand and the potential for supply disruptions. While New England expects to have sufficient energy during a mild or moderate winter, reliability risk is elevated during a period of extended extreme cold conditions. Oil reserves are below normal levels. During extreme cold, switching fuel types is not always successful.

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²⁴ https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_WRA_2022.pdf

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5 . R E C O M M E N D A T I O N S

The following sections highlight updated recommendations to the *Capacity Resource Study: Evaluation of Various Technology Options for Maritime Electric Company* issued by S&L on December 9, 2022. All recommendation updates are based on lessons learned from the extreme cold weather event that took place between February 3 and 5, 2023. Note that the recommendations in this section supersede those in the previous report, unless explicitly noted.

5.1. UPDATED RESOURCE RECOMMENDATIONS

On December 9, 2022, S&L issued the *Capacity Resource Study: Evaluation of Various Technology Options for Maritime Electric Company*. The report ultimately concluded that a portfolio of RICE/CTs, onshore wind, and solar photovoltaic was best suited to help Maritime Electric meet its most critical needs and goals. Based on a review of Maritime Electric's current and forecasted peak load, S&L previously recommended that a minimum of 85 MW of new RICE/CTs with biofuel compatibility should be installed on PEI as soon as possible to reduce the probability of load shed and rolling blackouts in the event of electricity import limits and/or interruptions from the mainland.

The extreme cold weather event that occurred between February 3 to 5, 2023, resulted in record peak load of 395.7 MW, which was over 72 MW higher (22.5%) than the previous peak load of 322.9 MW experienced in January 2022. As a result, S&L has revised its previous recommendation of a minimum of 85 MW of new RICE/CTs with biofuel compatibility to a range of 125 to 150 MW of the same technology, to bring the ratio of dispatchable capacity to peak load back in line with the 50% historical threshold (which would equate the risk of potential load shed in the event of mainland import curtailments to near historical levels). A range of additional capacity was specified because there is uncertainty regarding the future peak load forecast for PEI. The lower end of the recommended range is based on MECL's recently updated internal 10-year peak forecast and the higher end of the range is based on an escalation of the 395.7 MW peak experienced on February 4, 2023. In addition, MECL should continue to prioritize integration of both onshore wind and solar photovoltaic to help meet decarbonization goals, consistent with what was recommended in S&L's original report. Note that even with up to 150 MW of additional dispatchable capacity, there may still be a need for load shed to be implemented if PEI were not able to secure enough electricity imports to fully meet load; however, the additional 125 to 150 MW would help to bring the risk of load shed to be consistent with historical levels.

[Figure 5-1](#page-512-0) illustrates the ratio of dispatchable on-island generation capacity versus peak load both historically and forecasted through 2032. A second set of data points are included on the figure to illustrate

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how the ratio of dispatchable capacity versus peak load increases if 150 MW of additional dispatchable capacity is added on PEI in 2025. Note that current estimates for the retirement of the Borden Generating Station (40 MW) is approximately 2030. Additional capacity, beyond the 150 MW assumed in 2025, would have to be added to the system in 2030 to replace Borden's retired 40 MW capacity to maintain a 50% ratio of capacity to peak load. [Figure 5-1](#page-512-0) does not add any additional capacity to replace Borden; however, it does illustrate the impact of Borden's retirement in terms of the capacity to peak load ratio.

Figure 5-1 — Outlook of Dispatchable On-Island Capacity versus Peak Load

In addition, S&L continues to note that a new BESS demonstration project could help identify the BESS functions/use cases that offer the maximum benefit for the island.

5.1.1. Synchronous Condenser Considerations

Given the large distance between PEI and the large mainland generators, PEI must be self-sufficient in reactive power supply capability, which is necessary for maintaining voltage levels and system stability on PEI. This is an ongoing challenge, especially as more wind generation is added to PEI. A synchronous condenser is an example of electrical equipment than can help improve an electrical system's voltage regulation and overall stability. RICE and CTs have the ability to operate as a synchronous condenser when they are not generating electricity; under this mode of operation, the units use a modest amount of energy from the grid to synchronize (spin), helping to improve the system's electrical performance. The units do not consume fuel when operating as synchronous condensers. The 2020 MECL Integrated System Plan noted that after island load exceeds 350 MW, additional system voltage support (i.e., a synchronous

condenser) will be needed on PEI²⁵. Previous forecasts of island load estimated that levels higher than 350 MW would not be reached for a number of years; however, given PEI's load nearly reached 400 MW on February 4, 2023, additional system voltage support is needed today.

While both a CT and RICE can be fitted with the appropriate equipment to allow them to function as synchronous condensers when they are not generating electricity, the use of CTs as synchronous condensers is much more common than the use of RICE. In the December 9, 2022, report issued by S&L (*Capacity Resource Study: Evaluation of Various Technology Options for Maritime Electric Company*), S&L considered both CT and RICE options to be virtually equivalent from a technical capability perspective, with RICE being modestly less expensive. However, if MECL wishes to pursue an option with a strong pedigree of synchronous condenser operation, S&L recommends MECL pursue CTs over RICE.

5.1.2. Estimated Costs

[Appendix A](#page-516-0) of this addendum provides a detailed high-level cost estimate of purchasing approximately 170 MW of additional CTs, represented by a 3x0 simple-cycle design with General Electrical LM6000 PF+ SPRINT CT generators (three turbines at a 57.1 MW winter rating each). The estimate includes options for operation exclusively on diesel fuel as well as operation with biodiesel. Other manufacturers make units of similar technical capabilities that MECL could pursue, including varying capacities of CTs and RICE units the unit types and manufacturers shown in the following table are for illustration and high-level costing comparisons only. S&L recommends biodiesel fuel compatibility to reduce the risk of having a stranded asset in the event government fuel regulations change in the future—biodiesel is considered a renewable fuel by the Canadian government. The cost of equipment related to synchronous condenser operation is also included in this indicative estimate for the CTs (this is not included for the RICE due to the reasons described in Section [5.1.1\)](#page-512-1).

The following table provides a summary of the key operating details and levelized costs for the LM6000 option, along with an alternative RICE design. Additional details and assumptions are noted in [Appendix A](#page-516-0) for the CT design with the RICE details included in the previously report.

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²⁵ Maritime Electric 2020 Integrated System Plan, page 44 and 47

The levelized install cost (dollars per kW) for the LM6000 CT shown above is lower than the smaller RICE design (note that the levelized cost values consider economies of scale associated with the purchase of multiple generators to total approximately 150 MW). Furthermore, the cost for the synchronous condenser is already included for the CT option. However, the RICE design may provide more flexible operation due to the smaller unit capacities, as well as the ability to implement a staggered install schedule over time. As described in S&L's previous report, the RICE units also require less modification to operate on biodiesel fuel. At a capacity of 125–150 MW, along with the known synchronous condenser operational benefits of CTs, either the larger CT design alone, or a portfolio of CTs and RICE, are likely the best options for MECL.

5.2. WIND GENERATION LESSONS LEARNED

During the extreme cold weather event that took place between February 3 and 5, 2023, wind generation dropped substantially because of a number of cascading wind generator and system failures related to the cold temperatures and high wind speed / high wind turbulence. The drop in wind generation resulted in PEI having to import a significant amount of energy from the mainland during the event to avoid load shed. Fortunately, electricity imports, generation produced from the dispatchable generators on PEI, and the remaining wind generation on PEI were able to fully meet the record load experienced on the island; however, PEI came very close to having load shed during the coldest part of the event.

As discussed earlier, S&L had the opportunity to speak with WEICAN during the preparation of this addendum on the topic of what transpired between February 3 and 5, 2023. WEICAN operates several wind turbine generators on PEI for research purposes. During S&L's conversations with WEICAN, it became clear that there are several lessons learned that can and should be shared related to the wind generator and grid operation during the cold weather event between MECL, the wind operators, and the wind turbine original equipment manufacturers. These lessons learned will help to identify various

improvements and changes to avoid a similar drop off in wind generator production during a future extreme cold event.

Given these considerations, S&L recommends further information sharing, and/or a technical conference, between MECL, the wind operators, and the wind generator original equipment manufacturers to fully understand what transpired and find solutions to prevent a repeat of the challenges experienced between February 3 and 5, 2023.

APPENDIX A. NEW THERMAL GENERATION COST E S T I M A T E S

[Appendix A](#page-516-0) contains capital and operations and maintenance estimates for 14x0 and 3x0 simple-cycle designs with Wӓrtsilӓ 20V32 RICE and General Electric LM6000 PF+ SPRINT CT generators, respectively. The estimate includes options for operation exclusively on diesel fuel as well as operation with biodiesel. All values in CAD.

(1) Costs based on EPC contracting approach.

(2) Interconnection and land costs are assumed values.

(3) Property taxes and insurance costs are not included

in the above estimate.

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Total Fixed O&M (\$) (\$ 1,401,000 **\$** 1,401,000 **\$** 1,080,000 **\$** 1,080,000 1,000,000 1,080,000 1,080,000 1,080,000 1,080,000 1,088,000 1,088,000 1,088,000 1,088,000 1,088,000 1,088,000 1,088,000 1,088,000 1,088,000 1 **Total Fixed O&M (\$/kW-year) 5 6.30 \$**

O&M expenses assume low utilization (1% capacity factor); thus predominately allocate O&M spend on a variable basis.