

C A N A D A

PROVINCE OF PRINCE EDWARD ISLAND

**BEFORE THE ISLAND REGULATORY
AND APPEALS COMMISSION**

IN THE MATTER of Section 2.1(2) of the *Electric Power Act*, R.S.P.E.I. 1988, Cap. E-4, and **IN THE MATTER** of an Application by the City of Summerside Electric Utility for a Permit to provide service in the form of transmission from the Ottawa Street Substation to the Bedeque Substation.

Authorities for Closing Argument
Filed on behalf of Maritime Electric Company, Limited
Docket U30402
February, 2013

**D. SPENCER CAMPBELL, Q.C. and
NICOLE M. MCKENNA**
Stewart McKelvey
65 Grafton Street
PO Box 2140
Charlottetown PE C1A 8B9

DAVID W. HOOLEY, Q.C. and
KRISTA J. MACKAY
Cox & Palmer
Landing Place
20 Great George Street
Charlottetown PE C1A 4J6

Solicitor for Maritime Electric Company,
Limited

Solicitor for City of Summerside

J. GORDON MACKAY, Q.C. and
JOSHUA EGAN
Carr, Stevenson & MacKay
Peake House
50 Water Street
P.O. Box 522
Charlottetown PE C1A 7L1

Solicitor for Prince Edward Island Energy
Corporation

**AUTHORITIES FOR CLOSING ARGUMENT
FILED ON BEHALF OF MARITIME ELECTRIC COMPANY, LIMITED
DOCKET U30402
FEBRUARY, 2013**

Table of Contents

1. *Electric Power Act*, R.S.P.E.I. 1988, c. E-4
2. *Summerside (City) v. Maritime Electric Co. Ltd.*, 2011 PECA 13
3. *Re Irving Oil Ltd.*, 1986 CanLII 182 (P.E.I.S.C.A.D.)
4. *Re Summerside, Town of and Maritime Electric Company Limited*, [1983] P.E.I.J. No. 29 (C.A.)
5. Sullivan on the Construction of Statutes
6. *Consumers' Gas Co. (Re)*, 1986 LNONOEB 3
7. Direct Testimony of Paula D. Zarnett filed on behalf of Summerside Electric – OATT Intervention [excerpt]
8. Dow Chemical Canada Inc. Bypass Application – Alberta Energy and Utilities Board Decision U98125
9. Shell Canada Bypass Application – Alberta Energy and Utilities Board Decision 2002-060
10. BC Hydro Application for Approval of Bypass Rate Guidelines (1999)
11. British Columbia Utilities Commission Bypass Rate Guidelines
12. Petro-Canada Medicine Hat Pipeline Application – National Energy Board Reasons for Decision GH-3-2001
13. Cardinal Power Bypass Application – Ontario Energy Board Executive Summary EBRO 477
14. Coral Energy Bypass Application – Ontario Energy Board Dockets RP-2003-0063, EB-2003-0087, EB-2003-0097
15. Island Regulatory and Appeals Commission Report to Executive Council (November, 2003) [excerpt]
16. Interconnection Lease Agreement (consolidated to June 2, 1995)