



April 20, 2026

Maine Department of Energy Resources
22 State House Station
Augusta, Maine 04333

Re: 2026 Energy Storage Draft RFP

To Whom it May Concern:

Thank you for the opportunity to provide comment in response to the draft Request for Proposals for Energy Storage Projects. New Leaf is a leading national developer of solar and energy storage at both the distribution and transmission scale, in service of its mission to accelerate the transition to a world powered by renewable energy. Headquartered in Lowell, Massachusetts, New Leaf has been active in Maine since 2018, including participating in many legislative and regulatory discussions since then in the service of establishing a market for energy storage in Maine. We welcome this latest step toward establishing a storage program in Maine and respectfully submit the following comments.

As we have previously commented, New Leaf strongly encourages DOER to move quickly to establish a load reducer program for distribution-connected energy storage. In an environment of increased focus on ratepayer affordability in the near term, as well as growing concerns about the long-term cost of building out the transmission and distribution system to meet growing demand from beneficial electrification and AI, energy storage operated as load reducers can immediately deliver ratepayer savings and slow the pace of required T&D investment at the scale of the distribution system. Distribution-connected storage resources operated as load reducers are uniquely positioned to deliver these benefits, and can also be deployed much more quickly than transmission-scale resources.

We were therefore disappointed but not surprised to see that the Draft Storage RFP is premised on wholesale market participation, which is mutually exclusive with operation as a load reducer. In parallel with the administration of the current RFP, we strongly encourage DOER to work with the PUC to lay the groundwork for a successful load reducer program, in order to be able to include a load reducer financial option in future procurements. The two key pieces of regulatory groundwork that are required are updates to interconnection rules and retail rates to better tailor them for load reducer storage.

New Leaf has initiated development of distribution-connected energy storage projects in Maine, only to be halted in our tracks by an interconnection study methodology that assumes that a storage resource will be discharging and charging at full capacity at all hours of every day. This is not a commercially reasonable assumption, and it leads to excessive proposed system upgrades, even for projects interconnecting in locations that should have sufficient available capacity. This same issue arose several years ago in Massachusetts, and led to a DPU

proceeding to establish rules for studying energy storage projects based on operational schedules.¹ We urge DOER to work with the Maine PUC to establish similar interconnection rules for energy storage; without such rules it will be virtually impossible for any distribution-connected storage to be developed.

In addition, updates to retail rates are needed in order to cost-effectively deploy load reducer storage. The 2025 Synapse report on energy storage in Maine references the retail rates available for distribution-connected storage and notes that CMP's B-ES rate has an extremely high fixed volumetric charge. The storage industry has previously commented on that and other issues with the B-ES rate in PUC Docket 2021-00273. We recommend that the PUC look to the example of the ongoing stakeholder process in Rhode Island, in which a bidirectional time-of-use retail rate is being designed specifically for distribution connected, front-of-meter storage.² The rate structure in discussion in Rhode Island is highly compatible with a load reducer program, aligning cost causation for energy storage with the costs or revenues the project incurs through the rate, and serves as a strong example for Maine to follow.

Thank you for considering these comments. We believe that distribution-connected storage can provide significant benefits to Maine ratepayers, and we encourage DOER to work with the PUC to improve interconnection rules and retail rates. Once those pieces are in place, a future RFP can be structured to facilitate the deployment of load reducer energy storage.

Sincerely,

/s/ Jessica Robertson
Director of Policy and Business Development
New Leaf Energy
jrobertson@newleafenergy.com

¹ MA Operational Parameters Dockets: D.P.U. [23-115](#), [23-117](#), [23-126](#)

² RI Docket No. 24-34-EL Development of Tariffs Applicable to Energy Storage Systems Connected to the Electric Distribution Systems: <https://ripuc.ri.gov/Docket%20No.%2024-34-EL>