



April 20, 2026

Via electronic mail

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

RE: Primary Real Energy Solutions' Comments on the 2026 Energy Storage Draft RFP

Introduction

Primary Real Energy Solutions (“PRES”), a subsidiary of Granite Source Power (“GSP”), appreciates the opportunity to submit these comments in response to the Draft Request for Proposals for Energy Storage Projects (“Draft RFP”) pursuant to 35-A M.R.S. §10313. A competitive solicitation for energy storage projects is a significant step forward in achieving Maine’s reliability, efficiency, and clean energy goals. Since the passage of the Act Related to Energy Storage and the State’s Energy Goals in 2023 and the publication of the Governor’s Energy Office report on recommendations on Maine Energy Storage Programs in 2024, PRES been eagerly considering different development opportunities in Maine and is excited about the opportunity to potentially collaborate with the state and its utilities through this solicitation.

PRES is a Portsmouth based company incorporated in 2022 to develop utility-scale battery energy storage (“BESS”) and solar projects in multiple markets across the United States to improve grid reliability and energy affordability. PRES has an active pipeline of 15 projects totaling approximately 3 GW across nine states and five RTOs. Prior to starting PRES, the company’s co-founders and employees had more than six decades of collective experience in the renewable energy industry, during which they developed, sold, and acquired over 12,000 MW of onshore wind, solar, and BESS projects and closed more than \$10 billion of tax equity, cash equity, and debt financing. The team’s experience covers the full scope of development activities, from market analysis and site selection through real estate agreements and title work, environmental surveys, local, state, and federal permitting, good neighbor agreements and tax abatements, interconnection, preliminary engineering, offtake structuring, and major equipment selection. With deep New England roots, we are energized by the projects closest to home and believe that several of our projects in Maine would be an ideal fit for this RFP.

Overall, we are supportive of the Draft RFP and its structure. However, based on our experience developing projects in ISO-NE and responding to similar RFPs in other jurisdictions, we provide the following two key recommendations to improve the chances of a successful solicitation process:

1. To ensure that RFP reflects interconnection process timelines and commitments, DOER should:
 - a. Include an optional, limited contract adjustment to account for actual interconnection upgrade costs, or
 - b. Adjust security requirements that reflect interconnection study milestones
2. To ensure that DOER receives bids from a sufficient number of projects to feel confident the solicitation is competitive, DOER should cap the non-refundable bid fee at \$10,000 in line with bid fees from other jurisdictions

In the remainder of these comments we elaborate on these items, in addition to providing feedback on the topics of interest identified by DOER.

Interconnection Alignment

We expect that many of the projects that will seek to participate in this RFP will not have signed interconnection agreements and will likely be in the early stages of the interconnection process at the time of bid submission.¹ Whether connecting to the transmission system, distribution system, or to another generator, the process to achieve a capacity interconnection agreement in Maine is a lengthy process. As we see it, there are three paths to interconnection in Maine's ISO-NE territory for projects without signed interconnection agreements, which we outline below in Table 1 along with key milestones and limitations. In our estimation, project developers may not be able to start all or part of the interconnection process until October of 2026 and would not be able to expect full interconnection results for over a year after that. While DOER should delay the RFP due to these constraints, DOER should ensure that the RFP process reflects these interconnection processes as much as possible.

Table 1: *Interconnection processes in ISO-NE and Maine.*

Process	Next Opportunity to Participate	Earliest Expected Results	Limitations
ISO-NE Cluster Study Process	October 2026	Initial Cluster Study Report expected to be completed in October 2027 Restudy Report expected to be completed in May 2028	ISO-NE requires large financial deposits to enter and remain active in the interconnection study process Interconnection results from the first cluster study are not expected until Q3 2027
Utility Distribution System Interconnection Process	Rolling for distribution study Transmission cluster studies align with ISO-NE cluster study process ²	See above for Transmission cluster timelines	Large distribution connected projects (>2 MW, Level 4 projects) require transmission cluster studies that need to be coordinated with ISO-NE's cluster studies
ISO-NE Surplus Interconnection Process	Rolling	Timeline is not defined in ISO-NE's tariff	Surplus resources cannot utilize the full capacity rights of the existing generating units without market rule changes; to achieve full capacity rights a project must go through the ISO-NE cluster study process ³

¹ Based on ISO-NE's public queue data, there are only two projects in the transitional cluster located in the state of Maine (QP 1171 and QP 1427), neither of which are energy storage projects: <https://irtt.iso-ne.com/reports/external>

² Our understanding based on conversations with CMP is that a Level 4 interconnection application submitted to CMP after 9/15/2025 would be unable to receive i.3.9 approval prior to the transmission cluster study that will start in 2026. Projects need i.3.9 approval in order to sign a complete interconnection agreement with CMP.

³ ISO-NE is currently conducting a gap analysis regarding the surplus interconnection process, but has preliminary identified the limitations of using surplus interconnection service at the January 21, 2026 Transmission Committee meeting, including the definition of unused capability which limits the amount of capacity service a surplus generator is

As seen above, projects both connected to the transmission and distribution system will likely not know their full interconnection costs until at least 2027 at the earliest and 2028 at the latest. Given that DOER is planning to hold this solicitation in 2026, DOER should include provisions in this RFP to address these interconnection processes. DOER should seek to avoid (1) projects including conservative estimates of interconnection costs in their bids and then receiving windfall payments if actual costs are significantly lower and (2) projects including optimistic estimates of interconnection costs in their bids and then withdrawing from the solicitation process when their contracted price does not cover the actual interconnection costs.

Recommendation #1: Create an optional adjustment mechanism to the Fixed Price Proposal which would allow bidders to reflect actual interconnection costs. If a bidder selects this optional adjustment, they would be required to identify what portion of their fixed price proposal is due to the estimated interconnection costs and to provide their estimate of their interconnection costs. Then, after interconnection costs are known, the portion of the Fixed Price Proposal associated with interconnection costs would be adjusted to reflect actual interconnection costs. If actual interconnection costs come in lower than estimated interconnection costs, then the Fixed Price Proposal would be adjusted downwards proportional to the difference between the estimated cost and the actual cost, limited to 50% of the portion of their Fixed Price Proposal that was due to interconnection costs. If actual interconnection costs come in higher than estimated interconnection costs, then the Fixed Price Proposal would be adjusted upwards proportional to the difference between the estimated cost and the actual cost, limited to 50% of the portion of their Fixed Price Proposal that was due to the interconnection cost.

For example, if a bidder identified that \$1/kW-mo of its total \$10/kW-mo fixed price proposal was due to an interconnection cost estimation of \$1 million, but then actual network upgrade costs were \$750,000, then the portion of the fixed price bid associated with interconnection costs would be adjusted down by 25% or \$0.25/kW-mo ($((\$1,000,000 - \$750,000) / \$1,000,000) * \$1/\text{kW-mo}$), so the total contractual price would be \$9.75/kW-mo. On the other hand, if actual interconnection costs were \$1.25 million, then the portion of the fixed price bid associated with interconnection costs would be adjusted up by 25% and the total fixed price proposal would be \$10.25/kW-mo. In this example, the maximum that the final Fixed Price Proposal could be is \$10.50/kW-mo and the minimum would be \$9.50/kW-mo based on a 50% cap on the portion of the bid associated with interconnection costs.

Without an adjustment mechanism, developers who are waiting on interconnection study results may take a conservative view on interconnection costs resulting in the high end of a reasonable bid range. This would result in higher contractual payments even if those costs don't materialize. Alternatively, a developer who is waiting on interconnection study results may take an opportunistic view of interconnection cost resulting in bids at the low end of a reasonable range. If interconnection costs come in materially higher, developers may find that they cannot recover the full cost of those upgrades which may result in contract/project termination. Under an adjustment proposal, bidders would still have strong incentives to bid their expectations of costs to remain competitive but it protects both developers and ratepayers if those estimates are wrong. This is appropriate because developers do not control the cost of most interconnection upgrades.

If DOER does not allow for an interconnection cost adjustment to the Fixed Price Proposals, then DOER should change the security requirements to reflect when information becomes available in the interconnection process. Projects participating in ISO-NE's cluster study process are already required to post significant amounts of security, see Table 2 below, and should not be required to post additional security with the state of Maine prior to learning what those interconnection costs may be.

Table 2: Study deposit requirements for projects participating in ISO-NE cluster study process.

[https://www.iso-ne.com/static-](https://www.iso-ne.com/static-assets/documents/100011/rev_in_compliance_with_order_2023_and_2023-a.pdf)

[assets/documents/100011/rev_in_compliance_with_order_2023_and_2023-a.pdf](https://www.iso-ne.com/static-assets/documents/100011/rev_in_compliance_with_order_2023_and_2023-a.pdf)

	Cluster Study Entry Window			Cluster Study Report	Facilities Study Agreement	Interconnection Agreement
	<i>Initial Application Deposit</i>	<i>Study Deposit</i>	<i>Readiness Deposit</i>	<i>Readiness Deposit</i>	<i>Readiness Deposit</i>	<i>Readiness Deposit</i>
Form of Deposit	Cash: Submitted to ISO	Cash: Submitted to ISO	Cash, Surety Bond, or LOC: Submitted to ISO	Cash, Surety Bond or LOC: Submitted to ISO	Cash, Surety Bond, or LOC: Submitted to ISO	Form of Security Acceptable to Transmission Owner
LGIP	\$50,000	\$250,000	\$500,000	5% Network Upgrade Assignment	10% Network Upgrade Assignment	20% Network Upgrade Estimate
LGIP CETU Designated ¹²⁰	\$50,000	\$250,000	5% Network Upgrade Assignment	N/A	10% Network Upgrade Assignment	20% Network Upgrade Estimate
LGIP CNRIS-Only	\$50,000	\$100,000	\$200,000	5% Network Upgrade Assignment	10% Network Upgrade Assignment	20% Network Upgrade Estimate

Recommendation #2: If DOER does not include an interconnection cost adjustment mechanism to the Fixed Price Proposals, DOER should require the Initial Security posting of \$10/kW five business days after the Cluster Study Report rather than five business days after execution of the contract (redlines below) or delay contract execution until five business days after the Cluster Study Report.

4.4.1 Seller Security: An Initial Security amount of \$10/kW of Net Contract Capacity must be provided no later than five (5) business days after **ISO-NE publishes the Final Cluster Study Report** ~~execution of a contract~~. An additional amount of \$20/kW of Net Contract Capacity of the Facility must be provided no later than five (5) business days after execution of a Large Generator Interconnection Agreement with the Interconnecting Transmission Owner and ISO-NE as defined in Schedule 22 to the Open Access Transmission Tariff. The final \$10/kW must be provided no later than five (5) business days after the Facility reaches commercial operations.

Without an estimate of interconnection costs provided in the Cluster Study Report, a project may not be able to post an additional \$10/kW of security on top of the \$750,000 posted to ISO-NE to participate in the study process. An additional security deposit posting, which could more than double the amount of security that a project has posted, would likely dissuade projects from signing contracts or encourage projects to build in excess contingency into their bids to ensure that their contracted price will cover any interconnection upgrades.

While it is appropriate to require projects to post security, it is inappropriate to require projects to post security before bidders understand all project costs without an adjustment mechanism to address cost

changes. Requiring significant additional security ahead of interconnection results will significantly limit the pool of eligible projects, resulting in a less competitive solicitation.

Bid Fees

While PRES recognizes the need to recover the costs associated with evaluating bids, the bid fees proposed in the Draft RFP are out of line with bid fees for similar solicitations in other states despite the scope of administrative work required to evaluate these proposals being relatively consistent. High bid fees will limit the number of projects that are able to submit bids, therefore reducing the competitiveness of the solicitation. Table 3 includes the bid fees required to submit an application in other jurisdictions for recent storage solicitations.

Table 3: *Non-refundable bid fees to participate in storage solicitations in other jurisdictions.*

State	Non-Refundable Bid Fee
New York	\$100/MW, capped at \$10,000
Illinois	\$10,000/project (proposed)
Massachusetts	\$500/MW
New Jersey	\$200/MW

Recommendation #3: Consistent with bid fees in other jurisdictions, DOER should cap the bid fee at \$10,000 per base proposal and cap the additional fees for pricing variations on base proposal projects with identical configurations at \$1,000 per variation.

Responses to DOER Questions

General

1. *Timeline to have RFP open (Draft RFP Section 2.1).*
 - a. *Is it important to award projects in advance of the ISO-NE 2026 cluster request entry window in October? What would be the implications of instead providing a longer window for bid development?*
2. *Minimum project size of 3 MW (Draft RFP Section 3.2.4).*
 - a. *Should this minimum project size be maintained, adjusted, or eliminated?*

As discussed above, participating in this solicitation with a project in the early stages of the interconnection process will likely be difficult without an adjustment to the Fixed Price Proposal to account for interconnection cost uncertainty and with high security requirements at the time of contract execution. If DOER seeks to hold this procurement in 2026, PRES strongly recommends incorporating the recommendations above.

If DOER does incorporate the changes above, then issuing an award prior to cluster request entry window would reduce the number of projects that submit applications for ISO-NE's interconnection queue. Fewer projects in ISO-NE's interconnection queue reduces the risk of restudy later in the interconnection process, which would reduce the time required to study projects selected in the RFP.

If DOER does not issue awards prior to the cluster entry window, DOER should require projects to verify they have entered the ISO-NE study process according to their submitted plan and have made all associated entry deposits.

PRES recommends maintaining the minimum project size of 3 MW.

Interconnection and Delivery

- 1. DOER intends that projects located in the portion of the state administered by the Northern Maine Independent System Administrator are eligible to respond to this RFP, provided they meet all other established eligibility criteria. Does the RFP inadvertently preclude projects located in the NMISA territory?*
- 2. DOER intends that projects interconnected to the distribution system are eligible to respond to this RFP, provided they meet all other established eligibility criteria. Does the RFP inadvertently preclude projects interconnected to the distribution system?*
- 3. DOER intends that projects collocated with generation are eligible to respond to this RFP, provided they meet all other established eligibility criteria. Does the RFP inadvertently preclude projects collocated with generation?*

PRES notes that the Draft RFP Threshold Evaluation associated with site control are more stringent than ISO-NE's site control requirements, which do not require demonstration of site control for the interconnection route at the time of interconnection application. DOER should adjust the Eligibility Threshold for the RFP to align with ISO-NE's interconnection process, as projects in early stages of the interconnection process may not know the location of their interconnection route. Instead, DOER should only include site control for the interconnection route as a qualitative factor for assessing project maturity as already contemplated in section 5.1.5 of the Draft RFP.

3.2.3 Site Control/~~Interconnection Route Control~~: The Bidder must demonstrate control or an irrevocable option (conditioned only upon the payment of a reasonable amount) to acquire control over the site for the proposed Energy Storage Project, including any additional land rights (including easements) that are necessary for the development, construction, ~~interconnection~~ and operation of the facility.

Beyond the comments on interconnection alignment above, PRES does not have any comments on the ability of projects in NMISA or on the distribution system to participate in the solicitation at this time.

Safety and Security Plan Requirements

- 1. What other aspects can be addressed in the safety and security plan referenced in section 5.1.11?*

DOER should align the Safety and Security Plan requirements with the submission requirements associated with bids in the NYSERDA Bulk solicitation, section 4.2.3 of their RFP available here: <https://portal.nyserda.ny.gov/servlet/servlet.FileDownload?file=00Pcr00000YqxutEAB> and which were collected in Attachment G. Safety and Security Screening, available here: <https://www.nyserda.ny.gov/All-Programs/Energy-Storage-Program/Developers-and-Contractors/Bulk-Storage-Incentives>



PRES notes two requirements included in these documents should be stated explicitly as they may not have been captured in the safety and security plan as described in section 5.1.11:

- Battery-specific thermal runaway and off-gassing mitigation (including ventilation, detection, and suppression systems)
- Community notification and emergency coordination protocol with local first responders and municipalities, in not already intended to be included in the emergency response component of the Safety and Security Plan

Contract and Pricing

1. *The Energy Market Adjustment described in Section 4.2.2 and Appendix C is based on the Reference Energy Arbitrage Price in NYSERDA's Indexed Storage Credit calculation. The Energy Market Adjustment is intended to provide an incentive for bidders to maximize their energy market revenues while mitigating costs to ratepayers.*
 1. *Is the Energy Market Adjustment calculation clear enough to allow bidders to develop bid prices?*
 2. *Are there any unforeseen risks or challenges associated with the Energy Market Adjustment?*
2. *Is 20 years the best choice for a required contract term, or should the DOER consider requiring a shorter term to match the financial lifetime of some storage assets?*

It is difficult to evaluate these questions without visibility into the standard form agreement which would outline the final settlement associated with these contracts.

That being said, a 20-year term is the most contractable term length for energy storage projects at the moment and would lead to the lowest cost bids. Project augmentation can be used to offset project degradation over time and would likely be necessary to maintain contracted capacity requirements and wholesale market revenues consistent with the energy and capacity market adjustments to the Fixed Price Proposals.

Similarly, DOER should provide bidders additional details regarding the methodologies that it plans to use to evaluate indirect benefits and costs and auxiliary benefits. PRES wants to deliver projects that have the greatest value to Maine ratepayers. If there are criteria or specific evaluation methodologies that DOER has in mind for these benefit categories, bidders would benefit from understanding these such that they can optimize their projects to deliver these benefits.

Conclusion

Once again, PRES appreciates the opportunity to provide this feedback on this Draft RFP and looks forward to continuing this conversation with DOER.