

From: [Anderson, Alf](#)
To: [DOER](#)
Subject: AARP Comments on Draft Request for Proposals for Energy Storage Projects
Date: Monday, April 20, 2026 4:12:24 PM
Attachments: [Outlook-2020 ME lo](#)

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

AARP Maine submits the following comments to the Department of Energy Resources on its draft RFP to solicit up to 300 MW of energy storage projects pursuant to 35-A M.R.S. §10313. AARP Maine's priority is to ensure that basic electric service is affordable for all Maine households, particularly those who are on fixed incomes.

Our comments are directed to how the DOER will evaluate the proposals that are submitted. There is growing interest from CMP and stakeholders in exploring the use of properly sited battery storage projects to improve reliability of service and perhaps avoid investments in the distribution system itself. These conversations are occurring in the context of the Integrated Grid Plan and the PUC's exploration of more innovative approaches to improve reliability of service. Those conversations have focused explicitly on the potential distribution service benefits of such facilities. Those conversations appear to be distinct from the purpose of this RFP that focuses on potential wholesale market revenues by the owner of the battery storage facility to offset contract costs.

AARP Maine's concern with the RFP at this time refers to the obligation to ensure that the benefits of such projects exceed the costs to Maine electric ratepayers. The RFP identifies two distinct potential categories of benefits as presented in the slides in the DOER's public meeting on April 16, 2026:

Quantitative Factors Included in Ratepayer Benefit Determination

- Direct Contract Costs & Benefits (included in ratepayer benefit determination).
 - Direct Costs are revenues that flow from T&D Utilities to the Seller
 - Direct Benefits are revenues that flow from the Seller to the T&D Utilities
- Indirect Costs & Benefits (included in ratepayer benefit determination)
 - Changes in Energy Market Prices
 - Reduction in Capacity Market Prices
 - Deferred or Avoided Transmission & Distribution Costs

As you know, the costs of these contracts will be included in the distribution portion of the bill

issued by CMP and Versant Power (whether in the minimum monthly charge or the base rates). As a result, AARP Maine expects that the DOER will focus on making sure that the revenues from the market sale of this battery service will offset those contract costs included in our bills.

We are also concerned that the focus on “indirect” benefits may not be appropriate unless there is a monetized value of these benefits that can appear to offset the charges for these contracts on monthly customer bills. Estimated benefits that reflect assumptions about the impact of one or more battery storage facilities in Maine on what Mainers pay for the fixed price Standard Offer procured by the Commission each year is not compatible with our view of how these contracts should be evaluated.

Thank you for your consideration of AARP Maine’s comments.

Sincerely,

Alf Anderson

Alf Anderson

Associate State Director for Advocacy and Outreach | **AARP Maine**

53 Baxter Boulevard

Portland, ME 04101

w: 207.776.6310

c: 207.330.1147

e: aanderson@aarp.org

Connect with us www.aarp.org/maine

2020 ME lockup mini

