BLUEWAVE

VIA ELECTRONIC FILING

April 20, 2026

Dan Burgess, Acting Commissioner
Maine Department of Energy Resources
62 State House Station
Augusta, Maine 04333

re: Draft Request for Proposals for Energy Storage Projects Pursuant to 35-A M.R.S. §10313 – BlueWave Comments

Dear Acting Commissioner Burgess,

BlueWave appreciates the opportunity to provide comments to the Maine Department of Energy Resources ("DOER") on the draft Request for Proposals for Energy Storage Projects Pursuant to 35-A M.R.S. §10313 ("Draft RFP"). This RFP presents an opportunity to stimulate investment in energy storage resources providing benefits to Maine's ratepayers and the ISO New England grid.

BlueWave has developed and owns and operates several solar projects in Maine, and we are actively developing energy storage resources in the state. We are committed to delivering the benefits of clean energy to the grid, providing affordable, reliable energy supply.

The Draft RFP provides a solid framework for bidders to submit responsive proposals on a timeline that will allow for a competitive procurement relative to the ISO New England Cluster Study. Below we provide comments on specific Draft RFP provisions, as well as responses to certain identified Topics of Interest.

Comments on Specific Draft RFP Provisions

3.2.3. Site Control/Interconnection Route Control. This section requires that a bidder identify any "additional land rights (including easements) that are necessary for the development, construction, interconnection and operation of the facility." While this may generally be a reasonable requirement, it may pose unintended challenges for transmission-connected proposals that have not yet entered the ISO New England Cluster Study. The Cluster Study process may identify interconnection easements that the bidder could not reasonably anticipate at this stage in the project development process. Thus, we recommend amending this requirement as such, "additional land rights (including easements) that are known, knowable, and necessary for the development, construction, interconnection and operation of the facility." This will ensure that any unforeseen easement requirements identified in the interconnection process do not present a barrier for transmission-connected bids.

3.3.1.1.d) Minimizes Environmental Impacts. This section provides favorable evaluation to proposals that minimize environmental impacts, though it does not provide specificity on how a bidder may do so. BlueWave recommends providing specific favorable evaluation to proposals that are located on PFAS-contaminated agricultural land. This is consistent with Maine state policy, including LD 1591, which has encouraged the use of clean energy resources on PFAS-contaminated agricultural land. Energy storage resources should have the same preference, as they provide the same low-land disturbance energy benefits and encourage the redevelopment of contaminated lands into productive use.

Responses to Certain Topics of Interest

> ***Timeline to have RFP open (Draft RFP Section 2.1). 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?***

To encourage the most competitive pool of applicants, it is important to award projects in advance of the ISO-NE 2026 cluster entry window. The cluster entry window comes with relatively significant capital outlay that some bidders may choose not to proceed with, absent an award. This would reduce the pool of respondents and potentially lead to competitive projects electing not to bid.

> ***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?***

The Energy Market Adjustment is clear enough to allow for responsive bids. That said, we recommend incorporating an adjustment for forced outages, which would account for a project's downtime outside of the project's control that would otherwise limit the amount of potential energy market revenue obtainable by the project. This would more accurately align with the actual revenue attainable by the project and would reduce potential bidder variations based on different expectations of forced outages.

> ***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?***

Twenty years is an appropriate contract term as this aligns with the anticipated financial lifetime of energy storage resources. This contract term, coupled with the Index Storage Credit-style contract mechanism, will provide bidders with a level of revenue confidence that allows for bids with lower costs of capital, and will also ensure the benefits of the project continue to be shared with ratepayers for its expected lifetime.

Conclusion

Thank you for the opportunity to provide these comments on the Draft RFP. We look forward to continuing our engagement as this process progresses. Please contact us if you have any questions.

Sincerely,

/s/ Sean Burke
Sean Burke
Vice President, Policy & Government Affairs
BlueWave
sburke@bluewave.energy