



September 11, 2026

Celina Cunningham, Acting Commissioner
Maine Department of Energy Resources
62 State House Station
August, ME 04333

Re: Comments of Central Maine Power on Front-of-the-Meter DER Program Design Draft Program Proposal

Dear Acting Commissioner Cunningham:

CMP appreciates the opportunity to provide comments on the Maine DOER FTM DER Draft Program Proposal. We thank the Maine Department of Energy Resources (DOER), its consultants, and stakeholders for the considerable effort that has gone into developing this thoughtful and comprehensive proposal in response to the Legislature's directive to design a successor program to Net Energy Billing (NEB). The proposal reflects significant work to evaluate alternative program structures, consider evolving distributed energy resource (DER) capabilities, and identify pathways for aligning DER compensation more closely with benefits provided to customers and the electric system.

CMP provides these initial comments while noting that stakeholders have been provided a relatively short period in which to review and evaluate a proposal of this complexity. The proposed framework represents a substantial departure from Maine's historical approach to front-of-the-meter DER compensation and raises important questions regarding market design, implementation, operational requirements, customer impacts, cost allocation, and long-term administration. Given the breadth and complexity of these issues, CMP may provide additional observations and recommendations as further review and consideration occur.

As a general matter, CMP supports DOER's efforts to fulfill the Legislature's directive to develop a successor program that more closely aligns DER compensation with the value provided to the electric system and Maine customers. The statutory standard requires that any program provide benefits to ratepayers that exceed its costs. Accordingly, CMP urges caution and careful development of any successor program to ensure that it is designed around sufficient evidence that the associated customer costs are justified by demonstrable, measurable, and reasonably certain benefits. The proposal itself recognizes that further benefit-cost analysis and implementation assessment will be required before a final recommendation is made.

CMP appreciates that the proposal candidly acknowledges the significant planning, operational, technology, metering, communications, and administrative advancements that would be necessary to successfully implement a framework in which DERs provide meaningful distribution system

services through advanced distribution management systems (ADMS), distributed energy resource management systems (DERMS), and related capabilities. The proposal appropriately recognizes that implementation of these concepts depends upon the continued development of utility planning processes, supporting technologies, and operational capabilities.

At the same time, CMP encourages DOER to remain mindful that the electric industry is evolving rapidly. Utility planning tools, wholesale market structures, state policy priorities, distributed energy technologies, energy storage capabilities, flexible interconnection approaches, aggregation models, and customer adoption patterns continue to develop at a rapid pace. As a result, the electric system several years from now may look materially different than it does today. While it is appropriate to explore mechanisms that position DERs to provide increasing value to the grid over time, Maine should be careful not to establish a program framework that is overly dependent on a specific vision of how the industry will evolve. The proposal identifies durability and adaptability as key objectives and recognizes that program structures, planning processes, and grid capabilities are expected to evolve over time.

We look forward to continued engagement with the DOER and stakeholders on this proposal.

Sincerely,

Chris Morin
Senior Director, Integrated System Planning
Central Maine Power Company