



SOLAR ENERGY ASSOCIATION OF MAINE

November 18, 2021

To: Distributed Generation Stakeholder Group
From: Steve Weems, Executive Director, Solar Energy Association of Maine
Subject: Focus on Holistic Grid Planning + EUT Committee Coordination

Thank you for the invitation to comment publicly today. I decided to write instead.

I encourage you to place priority emphasis on “holistic” grid planning. Make a strong recommendation about how to structure such a planning process in your interim report due January 1, 2022.

To state the obvious, just about all the subjects in your charge can best be addressed within a reasonably detailed framework -- i.e., a strategic, long-range (holistic) grid plan. Even in a deregulated electricity system, this should encompass generation and delivery. We don't have such a plan. Nobody is working on one. Nobody is really charged with developing one. Most policymakers are desperate for one. The EUT Committee, for example, logically keeps asking the question: How can we do our job without one? For any stakeholder: What's the right amount of distributed generation? What incentives, disincentives, regulations, and rate structures are right? Where can and should we site the amount of renewable energy necessary to decarbonize our lives fast enough? Add more vital questions of your own. We need more than policy goals. We need an operational roadmap of a desirable future – my definition of a holistic grid plan.

There are states that are way ahead of Maine in trying to deal with this need. Nobody seems to have solved the riddle. The whole process and work seem hopelessly complex and devilishly hard. It will take a long time. There does not appear to be any ideal process to emulate. These are all the more reasons to tackle this as a priority now. Let's get started! MURRDI laid out the need, and made some suggestions, but left the hard organization structural design work for someone else. The EUT put this in your charge for a reason – it is vital and nobody seems to be working on this. I urge you to accept the challenge.

At its heart this is a public function. To be done well such planning must be in the public interest, writ large. If the plan is going to be holistic (anticipatory, long-range, encompassing many benefits and costs), the process must be holistic. It should be as apolitical as possible.



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I challenge you to come up with a better model than the following concept. Vest this responsibility with the Public Utilities Commission, with new legislation and new capacity. Require the PUC to engage in a stakeholder approach, and then ultimately to actually produce a holistic grid plan, based on functional and practical generation assumptions. Create legislation to give the PUC this responsibility and charge. Separate the functions of planning and regulation within the PUC, so the holistic grid planners can do their work unfettered with other PUC responsibilities. Find and adopt the best ideas from other states.

I don't mean to pontificate, and don't have any magic thoughts about this. I can recognize a compelling need though. The lack of a holistic grid planning process and result is a glaring and haunting deficiency. I think it is virtually impossible to make intelligent policy without such a plan. We are flying blind and pretty much know it. This is not recommended flying procedure. Please make taking this bull by the horns a priority of the NEB Stakeholder Group.

DG Stakeholder Group Grid Planning Memo 11-18-21