



2027 MAINE ENERGY PLAN

Information submitted in response to the March 2026 Request for Information

On March 25, 2026, the Maine Department of Energy Resources (DOER) issued a Request for Information (RFI) to inform the development of the 2027 Maine Energy Plan. DOER is required by law to update the Maine Energy Plan every two years. The next plan will be delivered to the Governor and the Legislature by January 15, 2027. The Energy Plan guides Maine's approach to energy policy, with a focus on delivering affordable, reliable, and increasingly clean energy to all people and businesses while achieving the state's statutory energy requirements and strengthening Maine's economy.

This RFI, which closed on April 27, 2016, was the first of several opportunities for public input during the planning process. Through the RFI, DOER welcomed public comments through a set of 'Questions of Interest' regarding the ways in which the energy landscape has changed since the publication of the 2025 Maine Energy Plan, whether and to what extent the original strategies and objectives should be updated, and how the next plan can best serve Maine people and businesses.

Throughout the remaining planning period for the 2027 Maine Energy Plan, DOER is seeking additional public input through several opportunities:

- **Public meetings and webinars:** DOER will host public meetings in Q1 and Q2 2026 to share draft results and gather feedback to inform the final Plan. Upcoming meetings on the Maine Energy Plan will be available on the [DOER public meetings page](#). Previous meetings will be listed in the [meeting archive](#).
- **Stakeholder survey:** The Department is seeking public input through a [short online survey](#). Interested individuals or organizations are invited to complete the survey to share input.
- **Meet with DOER:** Interested parties, organizations, and communities in Maine are encouraged to request DOER to present about the Maine Energy Plan process, provide input to shape the next plan, and ask questions. Please complete [this short form](#) on behalf of your group or organization and someone from the Department will be in touch.
- **Receive email updates:** To receive email updates on the Maine Energy Plan, including information about upcoming meetings, opt-in to the DOER general newsletter [here](#).

All comments submitted to DOER in response to the March 2026 RFI are included on the following pages of this document. Comments were submitted by the following entities.

- A Climate to Thrive
- Alliance for Sears Island
- Becky Bartovics

- Brookfield Renewable
- Central Maine Power
- Chelsea Moody
- Chris Spychalski
- Conservation Law Foundation
- CTC Global
- Efficiency Maine Trust
- Fran Turner
- International Brotherhood of Electrical Workers
- Islesboro Islands Trust
- Kim and Peter Yesis
- Lisa Buck
- Maine Audubon
- Maine Climate Action Now
- Maine Climate Action Now, Maine Youth for Climate Justice, Natural Resources Council of Maine, and Maine Labor Climate Council
- Maine Coast Fishermen's Association
- Maine Connectivity Authority
- Maine Labor Climate Council
- Maine Renewable Energy Association
- National Grid Ventures
- Natural Resources Council of Maine
- New England Power Generators Association
- Office of the Public Advocate
- Paula Carter
- PowerOptions
- ReVision Energy
- Shred Electric
- Sierra Club Maine
- Steffes, LLC
- Steven Ingalls
- Summit Utilities
- The Nature Conservancy in Maine
- Versant Power
- Yeman Company LLC

Response to the 2027 Maine Energy Plan Request for Information from A Climate to Thrive

A Climate to Thrive (ACTT) appreciates the opportunity to provide comments on the development of the 2027 Maine Energy Plan. ACTT is a community-based non-profit focused on an equitable, community-driven clean energy transition. We are based on Mount Desert Island, but work with communities across the state to support community-led climate action through our Local Leads the Way Program. ACTT is pleased to submit the following comments regarding the 2027 Maine Energy Plan.

Part 1: Engaging in Maine's Energy Plan

- C. Are you or your organization interested in participating in stakeholder meetings (virtual or in-person), small group discussions, or having DOER present to your organization or community about the planning process? If so, what format works best for you?**

ACTT welcomes the opportunity to engage in the planning process for the 2027 Maine Energy Plan. We are interested in participating in stakeholder meetings and small group discussions. We are also interested in partnering with the Department of Energy Resources to host community meetings on Mount Desert Island to collect community feedback on the plan and in hosting DOER at one of our Local Leads the Way calls to gather feedback from community-led climate action groups throughout the state.

- D. Are there specific topics that you would most like to see covered in public meetings or workshops?**

We are interested in discussing solutions that center community benefits in the energy transition, such as community-owned behind the meter distributed energy resources and virtual power plants and demand response programs that compensate household participation.

- E. What are the best ways to connect with and include socially vulnerable counties and communities in the energy planning process?**

Providing food, childcare and stipends for meeting participants and scheduling meetings outside of regular work hours can increase accessibility for socially vulnerable communities.

Part 2: Maine's Energy Landscape

- A. Which market, policy, or economic shifts that have occurred in 2025/2026 do you consider to be the most consequential for energy planning in Maine, and why?**

The energy landscape has shifted considerably in 2025/2026. The elimination of the Federal Investment Tax Credit for residential solar has significantly affected both

economics and public perception of rooftop solar. Furthermore, the phase out of direct-pay tax credits for local governments and nonprofits in 2026 will add significant barriers for community-benefitting distributed energy projects. Meanwhile, a significant reduction in the availability of other federal funding sources (such as grants and prizes) has slowed the development of community-benefitting energy projects.

In addition, changes to net energy billing have limited the ability of local governments to build solar arrays large enough to cover all their electricity needs. Maine's larger municipalities have more than ten small service accounts and thus would be unable to build a single array on their property that could benefit all their needs. In recent years we have also seen significant barriers to behind the meter battery interconnection in Versant territory. Working with homeowners on Mount Desert Island, we have learned that many are unable to participate in Efficiency Maine's battery program because their batteries are paired with rooftop solar and are unable to export to the grid due to interconnection policy in Versant territory. These barriers unnecessarily limit early battery adopters from participating in demand response and load flexibility programs.

B. As it relates to Maine, what are the most important near-term impacts of these changes (over the next 1-3 years) that should be addressed through this Energy Plan or planning process?

Without additional state programs, adoption of behind the meter residential and community-scale distributed energy resources will slow due to the rollback of Federal Tax Credits. We would like to see the 2027 Energy Plan help address this gap by developing better mechanisms for distributed energy resources to provide grid services at scale and receive compensation for these services. There is a strong need to reform behind the meter battery policies to remove barriers that deter adoption and prevent this technology from being fully utilized. In particular, policies must ensure batteries paired with solar are able to discharge to the grid and participate fully in demand response and load flexibility programs. Furthermore, the design of the Net Energy Billing successor program will be critical for the future viability of DERs in Maine and we hope that the successor program will reflect the value of community and cooperatively owned distributed energy generation.

C. How are these changes influencing financial decisions related to energy at the household and private sector levels?

The rollback in Federal support for clean energy has left households with few options to mitigate rising energy prices. At the community level, local governments have fewer opportunities to pursue innovative projects that could realize local benefits and improve resilience.

D. D. How do these changes specifically affect socially vulnerable communities, and what can Maine do to make sure the Energy Plan is designed to benefit everyone?

As energy costs rise, socially vulnerable communities are the hardest hit. We encourage the updated energy plan to prioritize investments that benefit low and moderate-income Mainers and enable more community ownership of energy generation. As an example, widespread adoption of well designed virtual power plants or demand response programs could provide participating low and moderate-income households with an additional revenue stream to offset energy costs and help pay for needed energy upgrades.

Part 3: Updating the Objectives of the Maine Energy Plan

A. Are the objectives from the 2025 Energy Plan still relevant? If not, what updates or changes would you suggest?

We suggest updating Objective A. from “Deliver Affordable Energy For Maine People and Businesses” to “Increase Energy Affordability for Maine People and Businesses.” We think that it is important to reframe this objective to move from passively “delivering” energy to Mainers towards actively supporting Maine people and businesses in becoming “prosumers” or active participants in their energy system.

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

Objective A: Deliver Affordable Energy for Maine People and Businesses

1. How should the energy plan define energy affordability?

We encourage DOER to consider energy burden - the percent of household income spent on all types of home energy (including heating fuels and electricity) - in its definition of affordability. This definition should also value the household’s ability to receive financial compensation for participating in the grid through DERs. For example, if a household receives compensation for participating in a demand response program or virtual power plant, both their energy compensation and expenses should be valued in their overall energy burden calculation. This approach would provide a more complete picture of a household's total energy expenditures and enable a comprehensive affordability toolbox that values approaches like efficiency, time of use rates, and household ownership of DERs.

2. How should the energy plan prioritize energy affordability while also ensuring modern and reliable energy infrastructure and meeting other goals?

We encourage DOER to consider a comprehensive approach to improving affordability - one that considers opportunities to not only reduce rates, but also build community equity by enabling low and moderate-income households to move towards energy

ownership, receive compensation for their active participation in the electric grid, and reduce their energy use through efficiency and electrification. Electricity rates, energy ownership, compensation for providing grid services (through demand response or VPPs), and energy efficiency should be considered together as components of energy affordability. Local energy ownership and customer-sited load flexibility are durable approaches to improving affordability and mitigating the risk of price volatility from fossil fuels.

3. What strategies would help ensure energy affordability for households and communities with the highest energy burdens?

Low income renters, who often live in old and leaky homes, are particularly vulnerable to volatile fuel prices for home heating and currently have little recourse to reduce these expenses. There is a strong need for programs, such as Tariff-on Bill Financing, that address the split incentive for energy efficiency and electrification upgrades between landlords and tenants

4. What metrics should Maine use to track progress toward delivering affordable energy?

Maine should utilize energy burden as a metric for tracking progress towards affordability as well as the number of LMI participants in demand management programs.

5. Are there other approaches that Maine should consider to reduce energy costs and price volatility?

Maine should focus on increasing utilization of in-state sources of renewable energy generation and load flexibility to reduce dependence on natural gas. There is a strong need to rapidly increase load flexibility programs and develop virtual power plants to allow for greater integration of renewable energy and reduce dependence on natural gas plants to meet peak loads. With widespread adoption of heat pumps and other electric home appliances, Maine has many behind-the-meter resources that are already deployed and could affordably provide grid services through a virtual power plant.

Objective B: Ensure Maine's Energy Systems are Reliable and Resilient in the Face of Growing Challenges

1. Please comment on how grid resilience, reliability, and security should be considered in Maine energy planning and how the state should be tracking/considering reliability and resilience in this Plan?

As we experience increasing frequency and intensity of disruptive storms and extreme heat, local resilience solutions at both the household and community level become essential. To increase resilience to growing climate disruptions, community resilience

hubs should be supported. Furthermore, we encourage DOER to continue investigating programs that enable household level resilience, such as vehicle-to-home residential backup power during outages. Finally, recent global conflicts have highlighted an urgent need to invest in local energy resources that are not reliant on imported fossil fuels as part of our energy security strategy.

2. Are there new technologies or innovative solutions to advance reliability and resilience?

Behind-the-meter batteries have strong potential to improve household and grid resilience. We would like to see policy barriers addressed to enable widespread adoption of battery storage and continued exploration of programs and policies to enable vehicle-to-home and vehicle-to-building bidirectional charging to enable backup power during outages.

3. Please comment on whether any statutory, regulatory, or policy changes are needed to support access to information about critical energy reliability and resilience topics across and or all energy sectors in Maine.

An interactive outage map that shows grid locations where outages repeatedly occur would be helpful for advocates and local decision makers exploring projects and grants.

Objective C: Responsibly Advance Clean Energy

1. Under law, DOER is required to identify approximate total project award targets for the next 3 competitive solicitations to be conducted by the department pursuant to 35-A M.R.S.A. §10313. Please comment on this requirement including priorities and considerations for the next three competitive solicitations and implementation of §10313.

We encourage DOER to investigate widescale utilization of residential distributed energy resources for virtual power plants and grid aggregators. Fair compensation mechanisms for residential participation in virtual power plants will further incentivize residential adoption of electrification and distributed energy resources and provide an opportunity for community members to receive economic benefits for their participation in the energy transition. Virtual power plants that utilize residential technologies that are already widely adopted, such as heat pumps, heat pump water heaters, and home batteries, have the potential to cost-effectively allow for greater integration of renewable energy.

6. Please comment on how to address financial barriers to clean energy deployment. What financial tools would aid in greater deployment of small or large-scale energy generation resources?

There is a need for better mechanisms to financially compensate DERs for providing grid services. Improved financial compensation would make these technologies more economical. While we support time of use rates, they are just one tool in the toolbox and additional policies are needed to enable widespread DER participation in grid services. We would like to see additional policies to move towards a better compensation structure for aggregation of behind the meter resources. Furthermore, new compensation structures for DER aggregation should reflect the need to move beyond traditional time of use rates towards real-time, dynamic control that can handle unexpected load peaks. There is an urgent need for greater load flexibility to avoid unnecessary solar curtailment and for this grid service to be fairly valued and for households to be compensated fairly.

7. Please comment on transmission and distribution capacity and infrastructure needs to facilitate deployment of new energy resources.

In Versant territory, we have become aware of the need to reform interconnection policy for behind the meter batteries to allow batteries paired with solar to export to the grid. Current policy unnecessarily prevents the use of batteries that are paired with solar from participating in demand response and load flexibility.

Objective D: Deploy Efficient Technologies to Reduce Energy Costs

1. Please comment on any opportunities for increased energy efficiency in any sector in Maine, including opportunities to advance specific technologies (ie: weatherization, wood heat, combined heat and power, heat pumps, etc.) or associated policies.

There is a great need for policies that make electrification and energy efficiency accessible to renters. Reaching renters should be a priority, as this group has little control over the cost of their utility bills due to the split incentive between landlord and tenants. The 2024 report, “Consumer Financing of Beneficial Electrification Products in Maine” prepared for the PUC, acknowledged that tariff-on bill financing programs are “uniquely poised to provide financing options for renters,” and that other program models are unlikely to fill this need. In addition, there is also a need for state programs to incentivize residential retrofits that move along the pathway towards whole-home decarbonization. While incentives for individual upgrades and technologies are an excellent starting point, we would like to see exploration of innovative programs to support low and moderate income households in pursuing sequential upgrades that build towards whole home decarbonization. A program such as tariff-on bill financing could help fill gaps between project costs and available rebates, providing more funding to move towards whole home decarbonization. Furthermore, providing fair compensation for residential participation in virtual power plants and demand response programs could further improve the economics of investing in electrification.

2. Comment on opportunities to expand load flexibility resources, particularly through voluntary consumer-enabled mechanisms.

Efficiency Maine incentives have successfully led to widespread adoption of electric appliances. As a next step, we would like to see increased grid utilization of these devices as DERs. Furthermore, there is potential to streamline participation in future load flexibility programs, by ensuring that all Efficiency Maine Trust rebated appliances have smart-grid capabilities and can easily connect to future load flexibility programs. In particular, we believe that all heat pump hot water heaters that receive rebates should have CTA 2045 ports.

Finally, we encourage DOER to meet with our partners at The Post Road Foundation to further explore policies that would support the kind of load shaping their technology offers. We are currently supporting their project, the Maine Transactive Energy Pilot, and deeply appreciate their consumer-controlled responsiveness. We would like to see their technology scale and hope DOER is open to working with them and other third-party aggregators to deploy technology that equitably supports Maine's grid.

ACTT appreciates the opportunity to share our feedback on the 2027 Maine Energy Plan and looks forward to continuing to engage in the process.

Sincerely,

Naomi Albert

Manager of Community Energy Planning and Policy, A Climate to Thrive



Islesboro Island Trust · The Friends of the Harriet L. Hartley Conservation Area · Preserve Rural Maine · Friends of Sears Island · Penobscot Bay Waterkeeper · Campaign to Protect Sears Island/wahsumkik · Freeport Wild Bird Supply · Belfast Bay Watershed · Friends of Maine's Seabird Islands · Sierra Club Maine

April 27, 2026

Re: Maine Department of Energy Resources – Maine Energy Plan update

The following comments are being submitted on behalf of the Alliance for Sears Island (“the Alliance”). The Alliance is a coalition of Maine organizations, individuals and businesses that support permanent conservation of all of Sears Island, and the development of a wind port facility at Mack Point, if any such facility is to be built in Penobscot Bay.

The Alliance commends the Maine Department of Energy Resources (“DOER”) for recognizing and prioritizing Maine’s transition to renewable energy within the Energy Plan to reduce the state’s reliance on fossil fuels. While pursuit of renewable energy is a key component of addressing the climate crisis, proper siting of renewable energy infrastructure, and conservation of lands already mitigating climate change must also be prioritized. Below are our responses to the “Questions of Interest” raised by DOER.

Part 1: Engaging in Maine’s Energy Plan

Part 1, Question A. It is critical to allow more time for questions or comments from the public during in-person workshops or presentations. Far too often, public engagement sessions falter when they force attendees to listen to a presentation for the majority of the session, and questions must only be submitted in writing, or only a few questions are allowed at the end of the presentation.

Part 1. Question B. DOER should hold an in-person, public meeting or workshop in Searsport, Maine. Searsport residents will be the most impacted by the proposed construction of an offshore wind (OSW) port and they should have the opportunity to meet with DOER, learn more from the agency, and have their questions and concerns heard in their own community.

Part 1. Question D. Specific topics that should be covered in public meetings or workshops must include the plans for an OSW port that will assemble and service the proposed OSW development in the Gulf of Maine.

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

Part 4. Objective A. Question 6 part C. As Maine pursues the development of renewable energy in order to address the climate crisis, the State must include conservation and proper-siting of renewable energy infrastructure as key components of their decision-making. The current proposal is to build an OSW port on Sears Island, rather than re-develop at Mack Point. Mack Point, located ~800 yards across the Bay from Sears Island, is an existing industrial port site that has the capacity to be redeveloped to accommodate the OSW port facility. The owner and operator of Mack Point, Sprague Energy, has publicly stated they are willing to host the port, they have experience in handling wind turbine technology and are currently handling turbine components for land-based wind projects. Sprague hired their own engineering firm to complete studies that demonstrated that the site can support the OSW port.

As we contemplate a just transition from fossil fuels to clean, renewable energy sources, responsible siting must be a key component of this transition. Redevelopment of an existing industrial site provides an opportunity to preserve Sears Island, an intact ecosystem which already sequesters carbon, and allows for the continued future operation of a port facility with expanded economic and job opportunities.

Intact forests and ecosystems are among the best tools for mitigating greenhouse gas emissions, according to a report by the International Panel on Climate Change. Intact and biodiverse coastal habitat, like that found on Sears Island, is extremely rare. The State of Maine's Carbon Budget, Version 2.0 identifies forestland as the most significant factor removing greenhouse gases from the atmosphere through carbon sequestration. Sierra Club has established strategic goals to address the climate crisis. Protecting 30% of our lands and waters from development by 2030 is a vital first step toward protecting intact ecosystems and restoring damaged ecosystems. Sears Island's forests and wetlands sequester 88,750 metric tons of carbon, the equivalent of emissions from 74,000 cars per year. According to the Nature Conservancy's land use mapping tool, by 2050 the island will sequester 96,685 metric tons of carbon. Destroying forested acres and carbon-sequestering wetlands for wind power is counterproductive. Conserving lands and waters is crucial in addressing the extinction and climate crises. Siting renewable energy facilities on structures or lands which have already been developed is preferable to impacting lands and waters which remain in their natural state. Redevelopment of existing industrial or developed sites is critical for conserving biodiversity, habitat connectivity, climate refugia, carbon sequestration, and food or water security.

Part 5: Additional Considerations

Part 5. Additional Considerations. Questions 1 and 2. The current proposal to build an OSW port on Sears Island violates the Sears Island Planning Initiative (SIPI) consensus agreement that prioritizes the construction of any future port at Mack Point.

In 2009, the Sears Island Planning Initiative (SIPI) reached a Consensus Agreement recommending future land use activities for Sears Island and Mack Point, designed to compatibly manage marine transportation, recreation, education and conservation. This agreement states:

“Mack Point should be given preference as an alternative to port development on Sears Island. MaineDOT in conjunction with interested parties, shall investigate and share factual information (which is not confidential or proprietary) on the extent to which Mack Point can, in fact, accommodate future marine transportation needs, including investigating the possibilities for acquisition and/or development of additional [on Mack Point] acreage for such use. ”

Thank you for the opportunity to submit comments the the update to the Maine Energy Plan.

Sincerely,

Jillian Howell
The Alliance for Sears Island

To doer@maine.gov
Re: Energy Plan RFI
From: Becky Bartovics
bbartovics@gmail.com

I am an environmental and energy advocate and have been since 1970. I live on North Haven Island in Penobscot Bay on a farm that is solar powered and wind powered from Fox Island Electric. The only fossil fuels are used on my infrequently engaged tractor. I have a hybrid car. I am an ocean person and have children and grandchildren who work in the waters of this bay. My background doing water and energy conservation and energy and environmental advocacy comes into play in my commentary below. Additionally I was a member of the Baldacci's Administration Sears Island Planning Initiative. Hence my comments.

Part 1: Engaging in Maine's Energy Plan

A. What recommendations do you have regarding the best ways to engage and solicit feedback from the public throughout the energy planning process in calendar year 2026?

Without real public engagement, in the form of open public meetings, workshops and hearings, the Department runs the risk of alienating the public at the outset. Actual involvement with the very well informed public can and should enhance the ability of the DOER to move forward in a constructive and effective manner. It may appear to slow the process down, but without allowing the public to weigh in, the Department is likely to run into more lengthy roadblocks along the way.

I attended many meetings with DOT and other Department representatives during the OSWPAG meetings. Often there was little to no actual engagement with the public, minutes did not

reflect any public commentary, for instance. Perhaps that is because there was a preexisting plan so that the public meetings were effectively window dressing. (as learned via FOAA information.)

As far as OSW is concerned, I am in favor of science based analysis of the best location for wind farms, as well as using the updated science based manufacturing innovation. We have been stuck far too long in an old paradigm about scale. This is an opportunity to look at a new more affordable and modular series of systems that will take Maine into the later part of this century, rather than being stuck in an outmoded model.

Whatever the discussion, I formally request that the Department hold bona fide public hearings.

D. Are there specific topics that you would most like to see covered in public meetings or workshops?

Active efforts to work with the indigenous and fishing communities must be paramount in your considerations for coastal work.

How is the Department/ State of Maine prioritizing reduction of excessive use; controlling the need for outsized output before building behemoths. Conserving energy should be the number one goal of the Department. Mostly that subject is relegated to an also ran if talked about at all.

Included must be the complete development, looking at the environmental impact and viability of the on land portion of proposed OSW port development, assembly and service of the proposed OSW development in the Gulf of Maine.

Part 2: Maine's Energy Landscape

Maine's Energy Landscape is not separate from its physical landscape. Everything is connected.

It is essential that the Energy Plan take into consideration the impact of decisions of the environment that we depend upon. For instance: NECEC did not consider the essential habitat in Maine's western forested wetlands to be of importance even though protecting them is one of the most effective means of reducing climate change worldwide. While we see that your Department is considering "energy resources" it is of utmost importance that the DOER consider its impact as it moves into larger energy projects.

Development on previously developed land, for instance, ought to be a key element of any large scale energy development project. It might be easy to dismiss the needs of the environment for immediate financial gains, however as you know, drought is impacting the entire state. Cutting forests increases drought and increases the temperature of rivers and the ocean. Unintended consequences need to be considered in any large scale effort (in small ones too).

Given the political situation that has caused increased volatility in the oil markets putting everyone at risk for much higher energy costs, DOER must work to radically reduce energy consumption in the older homes and particularly for the most vulnerable people. Having worked in energy conservation for decades, I know that it is not the bright shiny object on the wall. However it is the very best thing we can do for the people of Maine AND for our environment. Reducing fossil fuel use will have a major impact on health and welfare of everyone in every community. While we have done well so far with Heat pump distribution, we have not supported efforts to increase home energy training and jobs. Nor have we done enough to facilitate energy efficiency/ insulation. These efforts would make a major impact on the long

term economic development of the State of Maine- we are after all the most fossil fuel dependent in the nation.

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

Objective A. Deliver Affordable Energy for Maine People and Businesses. Question 6.C.

Comment on available information, data, or provide feedback on energy supply resources or potential resources in Maine. Topics of interest include, but are not limited to:

- a. Current/existing resources and operations**
- b. Feasibility and opportunities for development of new or expansion of existing resources**
- c. Land-use and siting considerations**
- d. Technologies and other relevant characteristics that may influence deployment**

I support this statement from Steven Miller

“Maine’s *Offshore Wind Roadmap* includes the following at Objective E: “Maine is committed to protecting and preserving the Gulf’s marine species, habitats, and wildlife, and to pursuing responsible development of offshore wind technology that advances renewable energy with as few adverse impacts as possible.” [Emphasis added.]

The Maine Climate Council’s *Plan for Climate Action, Maine Won’t Wait*, says in part: “Climate change and development are harming

Maine's natural and working lands and waters, which are key to the state achieving its carbon neutrality commitment by 2045.

Protecting natural and working lands from development maintains their potential to draw back carbon from the atmosphere, as well as provide important co-benefits. Maine's coastal and marine areas also store carbon, while supporting our fishing, aquaculture, and tourism industries." [Emphasis added.]

Therefore, As Maine pursues the development of renewable energy in order to address the climate crisis, Maine policy and common sense require integrating conservation and proper-siting of renewable energy infrastructure into responsible decision-making."

I strongly support development of OSW on Mack Point, a previously developed site. Active efforts to work with the indigenous and fishing communities must be paramount in your considerations for coastal work. And I urgently request that the DOER cease any plan to develop Sears Island. It is unique in Penobscot Bay for the natural resources it provides for many creatures, aquatic and land based, not the least of which are the people who need that island for their health. Since there is a viable alternative not a half mile away, it is ludicrous that any development proposal move forward on that island prior to the SIPI Agreed total build out of Mack Point.

Again I formally request a series of Public Hearings (not just meetings and workshops) where public input is seriously considered.

Thank you for your consideration

Becky Layton Bartovics
North Haven, Maine.

April 27, 2026

Maine Department of Energy Resources
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Augusta, Maine 04333
doer@maine.gov

Re: Response to 2027 Maine Energy Plan Request for Information

Brookfield Renewable appreciates the opportunity to respond to the Department of Energy Resources' request for information on the 2027 Maine Energy Plan (2027 Plan). Throughout the State of Maine, Brookfield owns and operates 622 megawatts (MW) of hydropower and several battery storage projects. Brookfield employs 100 individuals in Maine and our power generation operations support more than 400 indirect jobs across the State. Each year, Brookfield invests millions of dollars in capital projects in Maine and plans to invest more than \$400 million in its Maine facilities over the next 20 years. This includes a substantial portion to support fish passage and other environmental commitments, in line with our commitment and track record of running our operations with a significant focus on the protection of ecosystems and biodiversity.

By emphasizing environmental and community stewardship, Brookfield strives to work collaboratively with stakeholders and support community and organizational causes within operational areas throughout Maine. In addition, Brookfield is a significant taxpayer, paying in excess of \$20 million in property taxes in Maine annually.

Current Challenges to Hydropower in Maine

Hydropower addresses all five objectives of the current Maine Energy Plan, but chiefly hydropower reliably delivers affordable and resilient clean energy to the citizens of the state. Hydropower projects have exceedingly long service lives, providing security and stability to long-term energy planning. Hydropower systems provide significant, if often overlooked, climate resilience benefits by mitigating the impacts of extreme drought or flood conditions. In addition, dispatchable hydropower, in particular, complements intermittent clean energy sources such as wind or solar, and the loss of hydropower generation may require further reliance on emitting sources to support grid reliability. Finally, many of Maine's most cherished lakes and ponds are formed by impoundments that were created to support—and are economically subsidized by—hydropower projects.

None of this is new. The Legislature has repeatedly acknowledged the importance of hydropower to Maine, declaring that

[Its] rivers and streams afford the state's people with major opportunities for the enjoyment of nature's beauty, unique recreational activities and solace from an industrialized society, as well as for economic expansion through the development of hydropower

* * * * *

[The] best interests of the state's people are served by a policy which recognizes the importance that their rivers and streams have for meeting portions of several public needs, provides guidance for striking a balance among the various uses which affords the public maximum benefit and seeks harmony rather than conflict among these uses.¹

This clear state policy on rivers and hydropower has been severely undercut by recent State practice, which rather than being harmonious, deliberative, or balanced has been incoherent, inconsistent, and lop-sided. Nowhere has this been seen more clearly than in the relicensing of projects regulated by the Federal Energy Regulatory Commission (FERC).

Maine currently has 63 hydropower projects with FERC licenses, representing nearly 714 MW of authorized capacity. Twenty of these projects—including 12 owned by Brookfield—are currently engaged in either relicensing or surrender proceedings. Together these 20 projects represent 228 MW, or nearly a third of the total FERC licensed fleet in Maine. In the next 10 years another 16 projects will be expected to begin either relicense or surrender proceedings, representing another 247 MW of capacity.

Federal hydropower projects are authorized under the Federal Power Act², which was initially enacted as the Federal Water Power Act of 1920. FERC licenses are issued for terms of 30 to 50 years, and must be relicensed at the end of this period. A FERC relicensing is intended to be an open, transparent, and public process that requires a comprehensive assessment of project benefits and impacts on associated resources. FERC performs an environmental review under the National Environmental Policy Act³. But before FERC can act on a license application, the Maine Department of Environmental Protection (MDEP) must act on an application for water quality certification under Section 401 of the Clean Water Act⁴.

Due to the extensive scope of these reviews, relicensing processes generally begin 5–6 years in advance of license expiration, as Final License Applications are required to be filed no less than two years in advance of this expiration date. Throughout this long process Licensees conduct consultation with state and federal agencies, the federally-recognized Maine tribes, environmental non-governmental organizations, local municipalities and business interests, and private stakeholders. In addition to MDEP, other Maine agencies regularly involved in FERC relicensing include the Department of Agriculture, Conservation, and Forestry; Department of Inland Fisheries and Wildlife; Department of Marine Resources; and the Historic Preservation Commission.

A relicensing process is therefore necessarily long, complicated, and resource intensive—and is correspondingly expensive. The process costs alone for even a small project are consistently well over a million dollars, with post-license mitigation measures running to tens of millions of dollars. Relicensing, therefore, is a critical point of vulnerability for the economic viability for any hydropower project.

¹ 12 M.S.R.A. §401.

² 16 U.S.C. Ch. 12.

³ 42 U.S.C. §4321.

⁴ 33 U.S.C. Ch. 26.

FERC is charged with making a licensing decision that best meets the public good through carefully balancing *all* affected resources. FERC is statutorily required to give “equal consideration to the purposes of energy conservation, the protection, mitigation of damage to, and enhancement of, fish and wildlife (including related spawning grounds and habitat), the protection of recreational opportunities, and the preservation of other aspects of environmental quality.”⁵

Note that FERC’s requirement to balance competing resources is generally consistent with Maine’s Rivers Policy at 12 M.R.S.A. However, no Maine authority is currently charged with ensuring that hydropower proceedings strike a comparable balance, despite the Legislature’s clear directive: “the well-being of the citizens of this State depends on striking a carefully considered and well-reasoned balance among the competing uses of the state’s rivers and streams.”⁶

Into this vacuum each Maine agency acts independently, focused only on its own individual resource areas. No State authority coordinates agency requests for mitigation measures. No state authority reviews agency requests for consistency with state policy or existing management plans, or undertakes any sort of balancing review. No state agency that participates in FERC proceedings is charged with advocating on behalf of ratepayers or shoreline owners.

Without any State authority to coordinate all the incoming agency requests, State agencies are allowed to make maximalist demands for new mitigation without regard for other, conflicting resource goals. A recommendation for higher lake levels in an impoundment may result in a reduction of stream flows below the dam, where angling and boating takes place. A recommendation for upstream fish passage may inadvertently introduce new invasive species or diseases into fragile, carefully-managed river segments. In one notable case, a state fishery agency advocated for dam removal and acted as its own expert on Maine energy needs, actively denigrating the value of hydropower to the grid and ratepayers⁷. This is neither an efficient nor an effective way for a state to pursue energy or environmental goals, particularly with Maine continuing to be a net importer of electricity, importing between 10-30 percent of its needs at any time of year.⁸

All agency requests for studies or mitigation measures are reviewed by FERC for relevance, legality, and consistency with comprehensive resource plans. FERC weighs these requests as part of its balancing review and those measures that are appropriate under the Federal Power Act are incorporated as requirements of a new license.

However, in Maine the State agencies can also make recommendations to MDEP as part of that agency’s water quality certification process. As MDEP is not required to ensure these

⁵ 16 U.S.C. §797.

⁶ 12 M.R.S. §402.

⁷ Although many recent examples exist, one of the clearest is MDMR’s comments on FERC’s Draft Environmental Assessment for the Shawmut Project (https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20210816-5234).

⁸ U.S. Energy Information Administration, [State Profile and Energy Estimates](#)

recommendations are consistent with state law, policy, or plan⁹, the requesting agencies have no significant review threshold they need to clear. For its part, MDEP has held that it lacks the technical expertise or authority to evaluate recommendations from sister agencies, and thus recommendations from sister agencies are usually incorporated as conditions into water quality certifications with minimal or no modification. As FERC is forced to accept all certification conditions in a new hydropower license, state agencies effectively use MDEP's certification process to circumvent FERC scrutiny and balancing.

With no oversight or direction for the State agencies, Maine has become one of the most difficult states to complete a FERC relicensing as applicants become bogged down trying to meet the conflicting demands of different state agencies while maintaining the economic viability of these important facilities. Of the 20 projects currently engaged in active FERC processes, 10 are operating on annual licenses, which are automatically issued upon the expiration of a FERC licenses—meaning these projects required significantly more than 5–6 years to complete their proceeding. And for many of these projects, the ultimate outcome remains uncertain even after years of process.

Clean energy producers and businesses require predictability when making their investments in cleaner, more sustainable energy sources, and this is particularly true if Maine is to achieve the Mills Administration's goal of operating on 90 percent renewable energy sources by 2030 and 100 percent clean energy by 2040. While new developments may always be in vogue, Maine has a leg up on its neighboring states, given the presence of hydroelectric dams which have powered areas of Maine for a century or longer. And while Brookfield Renewable has plans to invest more than \$400 million in its Maine facilities over the next 20 years, the increasingly complex, expensive, and uncertain state regulatory environment surrounding hydroelectric operations does call some of these long-term plans into question.

Brookfield appreciates the Legislature's Resolves 2025, ch. 39, which charges DOER with reexamining the role of hydropower in meeting Maine's energy and climate goals. However, at the present time the Maine licensing process introduces unnecessary delay, uncertainty, and cost to a hydropower project without any reassurance of real checks and balances. This actively deters investment in the existing fleet, much less an expansion of new hydropower resources. Brookfield encourages the DOER to highlight these challenges and risks to resource retention and loss of renewable generation, and to identify ways for the State to take a more holistic approach to decisions impacting continued operations of hydropower resources that ensures a more balanced approach and outcomes that align with Maine's energy needs and goals.

Resource and System Planning and Policy Priorities

Over the last several years Maine has established itself as a leader in renewable energy. This includes laudable requirements specific to the State's reliance on renewable energy purchases for its own energy needs and directives related to new resource development to support those goals. Maine has also been home to resource development opportunities supporting policy requirements and procurement directives established in states throughout New England. While the growth in

⁹ Legislation has recently been proposed to add a balancing component to MDEP's certification process through LD1210 (<https://legislature.maine.gov/legis/bills/getPDF.asp?paper=SP0499&item=1&snum=132>).

buildout has undoubtedly served Maine in the form of economic benefits accruing from these projects, it has not been without new and emerging challenges that must be carefully considered going forward. Realizing future objectives will require close attention to cost impacts, current system capabilities, required transmission investment, and the potential impacts to existing resources.

Regarding the impact to existing renewable resources, specifically, if policy achievement is managed in a manner that ignores current resource contributions and system realities then new contracted renewables may have the unintended effect of harming, or even displacing, existing merchant renewable resources. This is worthy of highlighting as recent history shows a continued theme of pursuing new resource buildout without a full consideration of how such resources improve system reliability or whether incremental renewable generation in locations that already face transmission constraints and congestion present new risks to existing renewable resources that threaten the economic viability of certain resources over the long-term and impact the costs required to meet the statutory goals that have been put in place. To mitigate these concerns, future policy priorities must consider these broader implications and look to avoid promoting outcomes that, while supporting new resource development, inadvertently risk the loss of what is already contributing to Maine's, and the region's, energy needs and renewable goals. This means a focus on identifying pathways to support needed transmission investment to address system bottlenecks, and resource planning and procurement that takes a more comprehensive approach to purchasing decisions to ensure the avoidance of counterproductive measures. Brookfield therefore encourages the 2027 Plan to consider pathways that promote more optimal resource procurement and system investment.

Lastly, Brookfield appreciates the role of the Maine RPS in supporting new and existing renewables alike. Maine's RPS has been structured to acknowledge the critical contributions that existing renewables, including hydropower, make to the overall clean energy mix. Brookfield intends to participate in the DOER's forthcoming RPS review and will reserve substantive feedback and analysis for that process; however, in the context of the 2027 Plan we wish to highlight that the RPS has played, and can continue to provide, a significant role in supporting reinvestment decisions and in long-term decisions related to continued licensing commitments. Preserving a robust RPS that encourages contributions from existing renewable generators should remain a priority for ensuring lower costs to policy achievement and the continued viability of Maine's existing renewable energy fleet.

Sincerely,



Steve Zuretti
Senior Director, Origination and Policy
Brookfield Renewable
steven.zuretti@brookfieldrenewable.com
323-400-9715

From: [Lisa Buck](#)
To: [DOER](#)
Subject: Energy Plan RFI
Date: Friday, April 24, 2026 4:22:23 PM

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.

Hello,
I am writing to encourage stopping further development of Sears Island.
It is destroying natural ancient migratory habitat.
It is not necessary.
It can be done elsewhere.
Thank you for reading,
Lisa Buck
Portland ME
Sent from my iPhone

From: [PAULA CARTER](#)
To: [DOER](#)
Subject: Energy plan RFI
Date: Sunday, April 26, 2026 9:58:44 PM

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.

I did the survey today. Just wanted to add, with all the energy plans going around, be careful to conserve our wonderful beautiful state. Sears Island is a prime example. There is no reason to destroy the forest, soils and beauty there when Mack Point can be used.

Paula Carter
Belfast Maine
2079305368



April 27, 2026

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

Submitted via email: doer@maine.gov

Re: Conservation Law Foundation's response to DOER 2027 Maine Energy Plan Request for Information

Acting Commissioner Cunningham:

The Department of Energy Resources's 2027 Maine Energy Plan comes as energy costs are top of mind for Mainers, while the state is at a critical point on its path toward its statutory climate and clean energy requirements. The 2027 Energy Plan must be implementable and ambitious, advancing Maine toward a modernized energy system that is both clean *and* affordable, while being reliable and equitable, too. Conservation Law Foundation (CLF) appreciates this early opportunity to comment in this process and plans to participate throughout.

CLF is a public-interest advocacy organization focused on protecting Maine and New England's environment and safeguarding the health of our communities. CLF advocates for laws, policies and projects that advance clean energy and reduce energy demand, while saving families and businesses money and creating jobs. CLF works to reduce the region's reliance on fossil fuels and to modernize the region's electricity grid to better serve the needs of our changing society.

The 2027 Energy Plan must advance the dual goals of decarbonized and affordable energy systems

The need for affordable, decarbonized energy is urgent and overdue. Appropriately, the Legislature enshrined in statute these complementary priorities just last year when it established the Department of Energy Resources. Departmental responsibilities include not only ensuring "all households, communities and businesses in the State have access to an affordable, reliable and resilient energy supply to meet energy demand, address energy burdens and support economic development," but also a focus on quantified decarbonization metrics: "while

supporting the achievement of the greenhouse gas reduction obligations and climate policies . . . and the renewable energy goals . . .” 35-A M.R.S. § 10303 (internal citations removed). With respect to the Energy Plan specifically, the Legislature again directed the Department to focus on total energy costs for consumers while impressing the importance of the state’s climate and renewable energy mandates, for instance requiring it to “[d]etail the State’s progress toward meeting its energy goals for new renewable energy generation and energy storage. . . ,” “[e]valuate the State’s progress in meeting the oil dependence reduction targets,” and “[a]ddress the association between energy planning and meeting the greenhouse gas emissions reduction goals in the state climate action plan . . .” *Id.* § 10305(1). More directly, the Legislature directed the Department to “[e]nsure that the State’s energy goals, policies and plans align with and support the achievement of the greenhouse gas reduction obligations and climate policies established by Title 38, sections 576-A and 577.” *Id.* § 10305(16).

The needs for energy affordability and greenhouse gas emission reductions could not be more pressing than they are in the present moment. As the Department recently explained, “the average statewide price of heating oil was \$5.43 per gallon on April 6, a 42 percent increase since the Iran conflict began,” translating to an estimated “\$450 more to fill [a Mainer’s] tank to capacity than they would have in February.”¹ Given Maine’s substantial use of heating oil—more than any other U.S. state, per capita, and significantly more than any other New England state—these high costs threaten too many Maine families. And as the state’s 2025 Energy Plan highlights, this energy burden is not evenly distributed: for low-income households, the energy burden is nearly three times higher than the statewide average.² As such, we strongly support inclusion of Objective A in the new plan.

At the same time, decarbonizing becomes more urgent every day. The impacts of climate change are already here, including rising temperatures, bigger swings between wet and dry conditions, sea level rise and flood hazards.³ The Intergovernmental Panel on Climate Change explained three years ago, “[t]here is a rapidly closing window of opportunity to secure a livable and sustainable future for all . . . The choices and actions implemented in this decade will have impacts now and for thousands of years.”⁴

Decarbonization and energy affordability go hand in hand. Given the central role that greenhouse gas emissions and the resulting climate change play in determining the reliability and resiliency

¹ Maine Dep’t of Energy Resources, *Maine Department of Energy Resources Survey Shows Heating Fuel Prices Remain Elevated Above \$5 per Gallon*, (April 9, 2026).

² Maine Governor’s Energy Office, *Maine Energy Plan* (Jan. 2025) at 23.

³ The Maine Climate Council’s Scientific and Technical Subcommittee, *Interim Climate Science Report* (2026); see also [The Maine Climate Impact Dashboard](#).

⁴ Intergovernmental Panel on Climate Change, *AR6 Synthesis Report, Summary for Policymakers* (March 2023), at 23.

of our energy system, and the role that energy system planning and design can and should play in achieving emissions reductions, the 2027 Energy Plan should include detailed focus on and analysis of greenhouse gas emissions, climate change and the relevant legal requirements. Like Maine’s renewable portfolio standard, Maine’s statutory greenhouse gas emissions reduction mandates must be a foundational element of the 2027 Energy Plan.

For a cost-effective clean energy transition, the 2027 Energy Plan should focus on electrification, expanded grid capacity and increased load flexibility

It is critical that Maine not allow the federal government’s disinvestment in clean energy to derail our own pursuit of affordable, decarbonized energy systems. Fortunately, opportunities abound that will enable Maine to mitigate the impacts of climate change while advancing cost savings.

The 2025 Energy Plan appropriately found that Maine can help ensure energy affordability through continued efforts to reduce fossil fuel dependence. Increases in, and the volatility of, energy prices in Maine are largely attributable to the state’s over-dependence on imported fossil fuels.⁵ Thus, the previous plan emphasized the importance of both home-grown clean energy generation as well as electrifying end uses like heating and transportation for both “achieving Maine’s clean energy and greenhouse gas reduction goals,”⁶ and to reap “savings from decreased reliance on costly fossil fuels.”⁷ These findings and recommendations ring even truer today in the face of global turmoil causing surging oil prices and extreme volatility and uncertainty.

It is no surprise then that projects like the Northern Maine Procurement have been shown to offer significant energy, environmental and economic benefits to Maine and the New England region. According to a study commissioned by American Clean Power Association, adding a large source of low-cost, non-emitting energy to the grid as envisioned in the Northern Maine Procurement will reduce the need for dispatch of inefficient and expensive fossil fuel-fired resources, lowering wholesale energy market prices and providing significant energy cost savings for consumers.⁸ The study also found that over twenty years, 1,200 megawatts of land-

⁵ The Brattle Group reaffirmed this finding in its February 2026 report for DOER which concluded, “Maine can mitigate consumer risks by accelerating clean energy development, investing in load flexibility and cost-effective energy efficiency, and strategically electrifying end uses that rely on fossil fuels.” D. Murphy et al., The Brattle Group for the Maine Dep’t of Energy Resources, *Factors Driving Electricity Prices in Maine* (Feb. 2026).

⁶ The Brattle Group & Evolved Energy Research for Maine Governor’s Energy Office, *Maine Pathways to 2040* (Jan. 2025), at 35 (“Upgrades to the Maine and New England distribution and transmission systems will be a key enabler for achieving Maine’s clean energy and greenhouse gas reduction goals.”).

⁷ *Id.* at ix (“While overall expenditures on electric generation, transmission, and distribution will increase to serve higher demand from electrified end uses, these higher electricity costs are largely offset by savings from decreased reliance on costly fossil fuels. The average cost of delivered electricity will likely fall over time, since sales volumes will increase slightly faster than costs.”).

⁸ Daymark Energy Advisors, [*Market and Environmental Benefits of New England Renewable Generation*](#), (Dec. 20, 2022) at 4.

based wind and new transmission in New England will provide energy cost savings of nearly \$3 billion for the region.⁹ The generation of onshore wind in Northern Maine and transmission of that clean power to the New England grid present a timely and critical opportunity for Maine to affordably meet its economic development, clean energy and climate objectives. Given rising gas prices and freezes on clean energy resources like offshore wind, the 2027 Energy Plan should conduct comprehensive analysis of continued investments in Maine’s grid as an important pathway to cost-effective clean energy.

Long duration storage is another technology capable of contributing significantly to Maine’s cost-effective achievement of its climate and energy requirements and objectives. The 2027 Energy Plan should include quantitative analysis of this technology, which currently is being developed in Lincoln, Maine.¹⁰ The 2027 Energy Plan report should fully evaluate the role that long duration energy storage can and will play.

The 2027 Energy Plan must also recognize that certain grid investments will improve energy security and help Maine transition to a clean energy future. The Plan should fully evaluate the cost and environmental advantages associated with grid enhancing technologies. Given their many advantages, the report should provide expanded analysis of these technologies and prioritize them as tools for policymakers and lawmakers.

Load flexibility and energy efficiency should also be a key focus of the 2027 Energy Plan, particularly given recent developments slowing the growth of certain clean energy generation and showing the extreme volatility of fossil fuel pricing. The 2025 Energy Plan recognized, “[l]oad flexibility, particularly for flexible EV charging loads, will play a key role, helping to limit infrastructure needs for supply, transmission, and distribution resources, and therefore keeping costs down.”¹¹ The Brattle Group’s more recent report for the Department also rightly emphasizes load flexibility (in addition to electrification, efficiency, and renewables) as strategies for managing energy costs, including by reducing the need for utility investment in equipment and grid infrastructure.¹² In the 2027 Energy Plan, the Department must go further and should comprehensively evaluate time-of-use rates and demand response as tools for reducing peak demand for electricity, thereby reducing system costs and system emissions. Like

⁹ *Id.* at 10.

¹⁰ Office of Governor Mills, [*Governor Mills, Senators Collins & King, and Congresswoman Pingree Announce Nearly \\$150 Million Federal Grant to Develop World's Largest Multi-Day Energy Storage Facility in Lincoln, Maine*](#), (Aug. 6, 2024).

¹¹ The Brattle Group & Evolved Energy Research for Maine Governor’s Energy Office, *Maine Pathways to 2040* (Jan. 2025), at 74.

¹² The Brattle Group for the Maine Dep’t of Energy Resources, *Factors Driving Electricity Prices in Maine* (Feb. 2026) at 11.

time-of-use rates and demand response, energy efficiency will be an essential element of Maine's clean energy transition, and should be highlighted and further analyzed in the report.

Maine's 2027 Energy Plan should enhance energy planning coordination throughout the state and region

To achieve affordability, decarbonization, equity, and reliability—and to do so along a timeline that best serves Maine's people while according with law—requires herculean and concerted efforts by many players, not only this Department. To that end, this Department, and this Plan, must serve an important role in bringing together the various critical players and processes that are underway and forthcoming. We urge that the 2027 Maine Energy Plan not be a siloed process, but that it take place in coordination with other energy system planning processes, here in the state and in the region.

Here in Maine, for instance, the 2027 Energy Plan should be coordinated with the Maine Public Utilities Commission's integrated grid planning and climate change protection planning, the Climate Council's climate action planning, the Efficiency Maine Trust's efficiency, demand management, and electrification programming and planning, and the Office of the Public Advocate's energy burden analyses. The Energy Plan should consider existing plans, coordinate with ongoing processes, and identify pathways for cooperative implementation. There should be explicit interaction between this study and other energy planning efforts. Without such coordination, planning in Maine will continue to be siloed, and cost savings will be squandered.

The 2025 Energy Plan properly recognized that for Maine to meet its clean energy and climate requirements, it must continue to engage in regional cooperation on energy issues. These efforts have been exemplified, for instance, in the state's participation in the New England States Committee on Electricity effort to co-develop a procurement phase to the regional Longer-Term Transmission Planning process has meant that the process is unanimous, which has been critical in developing the process with ISO New England and receiving approval from the Federal Energy Regulatory Commission.¹³ Another example of regional cooperation is Maine's engagement with Massachusetts for the development of the Aroostook Renewable Gateway transmission line project to deliver onshore wind from Northern Maine to the grid.¹⁴ Although the first procurement was canceled, Maine is now working on a new procurement with four other states that will provide Maine and the region with clean, affordable energy. This 2027 Energy

¹³ NESCOE, *Potential Transmission Needs for a Longer-term Transmission Planning RFP* (Oct. 16, 2024); Howland, E., [FERC approves ISO New England's long-range transmission planning process](#), (July 24, 2024).

¹⁴ Maine Public Utilities Commission, *Request for Proposals for Renewable Energy Generation and Transmission Projects Pursuant to the Northern Maine Renewable Energy Development Program*, Docket No. 2021-00369, Order Regarding Massachusetts Determination (Feb. 3, 2023).

Plan should be coordinated with the transmission and economic planning processes at ISO New England, including the Longer-Term Transmission Planning.¹⁵

Relatedly, the 2027 Energy Plan should make implementable recommendations for reforms to planning, permitting and financing to expedite clean energy project timelines in Maine. This would be consistent with Maine’s latest Climate Action Plan, which describes in several sections the importance of siting and permitting reform.¹⁶ Despite these discussions and ambitions, and reforms in nearby states, few meaningful, tangible actions have been taken with respect to siting and permitting reform in Maine. We supported the objective of increasing awareness and information at the community level and of expediting project timelines through engagement and analysis that was put forward in the Maine Clean Energy Financing Study. These objectives and solutions demonstrate that clean energy development can and should be accelerated not by eliminating engagement and other participatory steps, but by prioritizing them at the outset. In particular, we hope this Plan will advance the Financing Study’s notion of a one-stop-shop for state permitting, a state-developed portal to address process challenges and a study to evaluate permitting and siting should all be pursued. The scope of the proposed permitting study should include not just challenges, but also opportunities for streamlining and otherwise improving permitting in Maine and should include recommendations to the Maine Legislature for laws and amendments that would advance those improvements. The study should also involve participation by representatives from all relevant state agencies and from relevant stakeholders and should explore ways to maximize stakeholder input and community benefits.

The 2027 Energy Plan should contain detailed analysis and data transparency

CLF commented on the 2025 Energy Plan about insufficient transparency around the cost-benefit data, analyses, and assessments of future costs that supported key findings. We criticized that plan for its reference to costs without presenting quantitative analyses. For instance, we highlighted that the report found that the 100% Renewable Generation Pathway would result in “materially higher energy supply costs,” but without quantifying those costs

¹⁵ ISO New England Longer-Term Transmission Planning, <https://www.iso-ne.com/committees/keyprojects/extended-term-transmission-planning-key-project>, including Order Accepting LTTP Phase 2 (July 9, 2024), <https://www.iso-ne.com/static-assets/documents/100013/er24-1978-000.pdf>, and ISO New England Longer-Term Transmission Studies, <https://www.iso-ne.com/system-planning/transmission-planning/longer-term-transmissionstudies>, including 2050 Transmission Study (Feb. 12, 2024), https://www.iso-ne.com/staticassets/documents/100008/2024_02_14_pac_2050_transmission_study_final.pdf.

¹⁶ Maine Climate Council, *Maine Won’t Wait* (Nov. 2024) at 80-83, 98-101 (“Improving the predictability of siting, permitting, procurement, and interconnection processes will help to avoid delays and cost increases. Maine’s permitting agencies, in collaboration with federal agencies, should continue to reduce barriers to essential clean energy and transmission projects to help the state meet its goals while ensuring meaningful public engagement and protection of natural resources. State regulators and utilities should seek to continually improve and modernize the process for connecting clean energy projects to the grid.”).

and without defining what “materially higher” or “more” costly meant.¹⁷ This, we argued, hampered policymakers and lawmakers’ ability to make informed judgments about how to achieve Maine’s climate and clean energy requirements.

We now urge that the 2027 Energy Plan include transparent and robust cost benefit analysis as well as more transparency around data analysis to support the findings in the report and arm Mainers and decision-makers with more information.

The 2027 Energy Plan should be ambitious and actionable

As the Department sets out on this extensive process to develop the 2027 Energy Plan, a driving consideration should be a culminating report that is adequately ambitious and implementable. Setting a general direction for the state is important, but the clearer and more specific the recommendations are, the more readily state entities can implement them and the state can comply with its statutory mandates. Again, the Energy Plan has a lofty purpose: to ensure Maine’s energy systems are affordable, decarbonized, equitable, and reliable—and to ensure these transitions occur along a rapid timeline. No single entity is or should be responsible for all this will entail. It is therefore critical that this document centralize the state’s various energy planning efforts and identify what and how much needs to be done, by who, and by when. The 2027 Plan should include quantifiable metrics and specific recommendations to guide concrete action and implementation. This should include suggested legislative and regulatory amendments, and specifications as to how to ensure coordination amongst state agencies and other entities. Further, quantified targets should be earmarked back to the state’s overarching energy directives, including the renewable portfolio standard and greenhouse gas emissions reductions.

The 2027 Energy Plan must go further than prior efforts to advance equity

Equity must inform all clean energy and climate planning. The clean energy transition is an opportunity to “undo some of the legacy of traditional energy infrastructure, which was often sited nearer to and had a greater impact on vulnerable communities,” as the Department has recognized.¹⁸ The 2027 Energy Plan should incorporate and advance the work that has already been done in the state, including that of the Maine Climate Council and its Equity Subcommittee, which identifies equity as a “core goal.”¹⁹ The 2027 Energy Plan should explicitly consider and evaluate impacts of explored pathways on vulnerable communities, including those that have borne disproportionate impacts from energy infrastructure

¹⁷ CLF Letter on Draft 2025 Energy Plan, (Dec. 30, 2024) at 5.

¹⁸ The Brattle Group & Evolved Energy Research for Maine Governor’s Energy Office, *Maine Pathways to 2040* (Jan. 2025), at 70.

¹⁹ *Id.* at xi.

development and/or bear the disproportionate impacts of climate change, as well as those that face disproportionately high energy burdens.

Public engagement is a key component of advancing procedural equity, and so we are pleased to see the Department's up-front efforts to engage the public in this process. The Department's plans to host a series of meetings, interviews, and public comment opportunities are a good start. The Department's efforts should, at a minimum: ensure that those who bear disproportionate impacts from energy infrastructure development and/or bear the disproportionate impacts of climate change, as well as those that face disproportionately high energy burdens, are made aware of this process through means that are calculated to reach them (e.g., not just contacting the Department's email list); provide meaningful opportunities for community members and organizations to get involved, including additional opportunities for the public to provide written and oral comments; and provide resources and technical assistance regarding the draft plan, including plain-language summaries and translated materials as needed. These procedural tools should be complemented by the development of processes that ensure the equitable distribution of the burdens and benefits of Maine's energy system.

The 2027 Energy Plan must be cautious in its reliance on “clean fuels” and conduct full quantitative analysis

Since publication of the last Energy Plan, Maine's legislature has adopted a Clean Energy Standard, and the Department of Environmental Protection is expected to regulate to define what is eligible. *See* 35-A M.R.S. § 3210(2)(A-4), (3-D). While what constitutes clean energy is now out of this Department's hands, we caution the Department to exercise caution in continuing to rely on so-called clean fuels in its energy planning work. It remains critical that the state be thoughtful and transparent about the costs and lifecycle greenhouse gas emissions of these fuels. The prior energy plan acknowledges that “[i]t will be important to ensure that these advanced fuels are truly low-emission and sustainable, or at least to clearly understand and offset any emissions.”²⁰ But the report fails to assess those emissions, or the offset thereof. To the extent this energy plan projects reliance on these fuels (presumably, consistent with the new clean energy standards), it must comprehensively assess the cost and environmental implications, including emissions profiles, of these fuels.

²⁰ *Id.* at 36.

Conclusion

CLF appreciates this opportunity to provide comment to inform development of the 2027 Maine Energy Plan. We hope to continue supporting the Department's efforts throughout this process, and would be happy to discuss any of these recommendations in greater detail.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Emily K. Green', is written over a horizontal line.

Emily K. Green

Director of Clean Mobility
Conservation Law Foundation



April 27, 2026

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

Dear Acting Commissioner Cunningham:

Central Maine Power Company (“CMP”) appreciates the opportunity to provide the following comments on the Maine Department of Energy Resources’ (“Department”) 2027 Maine Energy Plan Request for Information (“RFI”).

Part 1: Engaging in Maine’s Energy Plan

CMP supports broad, transparent stakeholder engagement throughout the planning process. Given that stakeholders with differing interests often participate across multiple forums including state agencies, the Maine Public Utilities Commission (“MPUC”), and ISO New England, aligning stakeholder priorities and processes across these venues is a critical element of an effective Maine Energy Plan.

As the transmission owner and operator for the entire State of Maine, and the owner and operator of the electric distribution system serving more than 670,000 customers in 346 communities across central and southern Maine, CMP brings extensive experience in planning, constructing, operating, maintaining, and restoring the electric system, including during major storm events. This experience is essential to effective energy planning, and CMP is therefore interested in actively participating in stakeholder meetings during the development of the State Energy Plan.

Potential topics for public meetings or workshops could include Maine’s role in regional reliability, capacity, and transmission planning processes and requirements, as well

as an overview of electric industry deregulation and the key components of customers' electric bills.

Part 2: Maine's Energy Landscape

The most consequential developments since the 2025 Energy Plan are continued volatility in electricity supply and capacity costs, growing winter peak demand, and the increasing share of customer bills attributable to public policy charges. These factors materially affect customer affordability and are largely outside utility control.

Part 3: Updating the Objectives of the Maine Energy Plan

The objectives of the 2025 Energy Plan are still relevant and remain appropriate, but should place greater emphasis on total bill impacts, winter peak demand, and supply-side constraints. Updated demand forecasts, winter peak assumptions, and full-bill cost analyses should be prioritized.

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

Objective A: Deliver Affordable Energy for Maine People and Businesses

Any definition of energy affordability should consider total customer energy costs, including supply, transmission, distribution, and public policy costs, as well as costs of oil, natural gas, propane, and gasoline that are displaced by a transition to electrification. With respect to programs, initiatives, or potential initiatives where costs over time may be uncertain, a rigorous affordability analysis should measure costs to customers and ascertainable benefits that accrue to Maine ratepayers, which reflects Maine's "ratepayer beneficial" test in section 10313 of Title 35-A.

The 2027 State Energy Plan should also consider cost-of-service, utility-owned generation and lifting Maine's outdated prohibition on affiliate interconnections as approaches to reduce energy costs and address supply price volatility. Increased competition in private development would apply downward pricing pressure, while cost-of-service generation could complement Maine's robust renewable resources with additional

sources of power to address growing load and changing usage patterns. Utility-owned battery storage that is integrated into the transmission and distribution system should be prioritized for its potential to defer other capital investments to serve peak load and provide reliability and resilience benefits in storms and blue-sky outages alike.

Looking ahead, trends for energy demand in Maine indicate that growth will be driven primarily by winter electrification. Recommendations that heat pump users “set it and forget it” mean that this winter load will likely be more consistent throughout the day and throughout the winter months, which may drive supply concerns and require adding system capacity.

Objective B: Ensure Maine’s Energy Systems are Reliable and Resilient in the Face of Growing Challenges

Grid resilience, reliability, and security should be considered in the 2027 Maine Energy Plan in coordination with MPUC-set service quality metrics. To continue our progress toward a smarter, stronger, more reliable grid, CMP supports deployment of technologies identified in CMP’s Climate Change Protection Plan and Integrated Grid Plan (“IGP”) that complement foundational grid investments. Utility-owned battery storage can provide reliability and resilience benefits by supporting peak load management, improving system flexibility during constrained winter conditions, and enhancing outage response.

Objective C: Responsibly Advance Clean Energy

Advancing clean energy responsibly will require coordinated investments in the T&D system to enable advanced forecasting capabilities that leverage real-time system data, improved system mapping, and upgrades to back-end systems to collect, manage, and utilize expanded data sets for both systems operations and system planning. Enabling flexibility through battery storage and technologies such as an advanced distribution management system (“ADMS”) and a distributed energy resources management system (“DERMS”) can also advance new interconnections by providing grid operators with new tools to effectively manage an increasingly complex system. These approaches are further discussed in CMP’s IGP.

Objective D: Deploy Efficient Technologies to Reduce Energy Costs

As discussed above, efficient utilization of the electric grid involves improving our collective ability to shift demand, deploy generation, and dispatch battery storage as use of the grid evolves. Battery storage integrated into the T&D system may, in certain circumstances, improve utilization of existing infrastructure, reduce peak demand, and provide benefits that accrue broadly to customers when treated as a regulated cost-of-service asset.

Objective E: Expand Clean Energy Career Opportunities for Maine People and Advance Innovation

CMP is a leading employer in Maine's energy industry, and we have demonstrated that partnerships with local high schools, community colleges, universities, and labor organizations can effectively develop a pipeline of trained, skilled energy professionals. These relationships have helped create family-sustaining jobs, retain talent in Maine, and ensure the safety and reliability of electric service.

However, CMP still relies on out-of-state contractors for storm response on many occasions, and for blue-sky capital work. Expanding CMP's full-time, Maine-based workforce would reduce dependence on higher-cost, out-of-state labor while keeping more energy-sector wages, benefits, and career advancement opportunities in Maine communities. Increased in-state employment also supports faster restoration times, stronger institutional knowledge of the system, and improved coordination with local emergency managers and municipal officials.

Further collaboration through the 2027 State Energy Plan with high schools, colleges, apprenticeship programs, and industry organizations presents an opportunity to align workforce development with the scale and complexity of Maine's future electric system. As electrification, distributed energy resources, grid modernization, and climate-resilience investments accelerate, the demand for highly skilled lineworkers, engineers, technicians, and IT professionals will continue to grow. Intentional planning now can ensure that Maine residents are prepared to fill these roles, creating long-term careers that strengthen both the energy system and the broader economy.



Beyond the energy sector itself, electric reliability, power quality, and system capacity are foundational to statewide economic development. CMP's largest commercial and industrial customers consistently identify power quality and available capacity as primary concerns. These concerns are not limited to energy-intensive industries; manufacturers, data-driven businesses, hospitals, research institutions, and retail employers alike depend on a reliable and resilient electric grid.

Strategic investments in transmission and distribution infrastructure directly support Maine's competitiveness by reducing unexpected downtime, protecting sensitive equipment, and enabling new load growth. A strong and reliable T&D system allows Maine to attract new businesses, retain existing employers, and support small businesses that depend on reliable power to operate efficiently. These investments also help unlock economic development in rural and underserved areas, where electric constraints can otherwise limit housing development, commercial activity, and job creation.

Sincerely,

Craig T. Nale
Sr. Director, Regulatory Affairs
Central Maine Power Company

April 27, 2026

CTC Global Response to the 2027 Maine Energy Plan RFI

I. INTRODUCTION

Thank you for the opportunity to provide input on the development of the 2027 Maine Energy Plan. CTC Global appreciates the Maine Department of Energy Resources' commitment to an inclusive and data-driven planning process. As a provider of advanced transmission conductors, we have focused our responses on the questions most relevant to our ACCC® conductor technology and its role in addressing key challenges facing Maine's energy system, particularly those related to affordability, reliability, resilience, and the efficient utilization of existing grid infrastructure.

ACCC advanced conductors are next-generation transmission lines that replace the traditional steel core of conventional conductors with a lightweight, high-strength carbon and glass fiber composite core, allowing significantly more aluminum—the primary electricity-carrying material—to be used without increasing size or structural load. This design enables utilities to carry up to roughly twice the power on existing lines while reducing electrical losses by approximately 25–40%, meaning less electricity is wasted as heat during transmission and customers ultimately pay less for inefficiencies in the system. Because ACCC can be installed on existing transmission infrastructure (a process known as reconductoring), it avoids the high costs, long permitting timelines, and siting challenges of building new lines, often reducing project costs by up to 50–75% and shortening deployment timelines from a decade to as little as 6–24 months.¹ These combined benefits lower system congestion, improve efficiency, defer expensive infrastructure upgrades, and ultimately reduce electricity costs for families and businesses in Maine. Additionally, when ACCC is applied to new or rebuilt transmission lines, its lighter weight and lower sag characteristics can enable designs with shorter structures requiring less steel and smaller foundations, as well as longer spans that reduce the total number of structures needed. This lowers overall project costs compared to conventional steel core conductor designs.

II. RESPONSES TO RELEVANT QUESTIONS

Objective A Part 1: Engaging in Maine's Energy Plan

Question 1A: What recommendations do you have regarding the best ways to engage and solicit feedback from the public throughout the energy planning process in calendar year 2026?

First, hybrid (virtual and in-person) engagement is essential given Maine's rural geography. Second, engagement should also incorporate real-world infrastructure case studies—such as reconductoring vs. new transmission builds—to illustrate cost, timeline, and reliability tradeoffs.

¹ See the attached case studies on pages 5-7 of this PDF.

Objective A Part 2: Maine's Energy Landscape

Question 2A: Which market, policy, or economic shifts that have occurred in 2025/2026 do you consider to be the most consequential for energy planning in Maine, and why?

Policy Shift: In 2025, Gov. Mills signed into law LD 1726, which seeks to strengthen Maine's integrated grid planning process by requiring utilities and regulators to more systematically evaluate grid constraints, forecast electrification-driven load growth, and identify cost-effective near-term investments, with a particular emphasis on incorporating advanced transmission technologies (ATTs)—including advanced conductors—into planning analyses. Specifically, it directs the Public Utilities Commission to ensure that grid plans assess technologies that improve efficiency, increase capacity, and reduce congestion—such as advanced conductors and other grid-enhancing technologies—and to better integrate these solutions alongside traditional infrastructure and non-wires alternatives, signaling a clear policy shift toward prioritizing faster, lower-cost upgrades to existing transmission systems rather than relying solely on new build infrastructure.

Market/Economic Shifts: The most consequential shifts in 2025–2026 include accelerating electrification, increasing need for long-term transmission planning, and growing adoption of ATTs. Electrification from heating and transportation and data center growth are driving new patterns of load growth and uncertainty that existing grid infrastructure was not designed to accommodate. At the same time, the region faces the need to integrate new clean energy resources, particularly in northern Maine, while maintaining flexibility to accommodate potential future offshore wind development as policy and market conditions evolve. This requires additional transfer capability and more flexible use of the existing system. In response, ISO-NE and FERC are placing greater emphasis on longer-term, scenario-based transmission planning to identify cost-effective solutions that can meet future system needs. ATTs, such as advanced conductors, are gaining importance because they can quickly and cost-effectively increase capacity on existing infrastructure, helping to defer more expensive and time-consuming new transmission builds while supporting reliability, policy goals, and customer affordability.

Question 2B: As it relates to Maine, what are the most important near-term impacts of these changes (over the next 1–3 years) that should be addressed through this Energy Plan or planning process?

As it relates to Maine, the most important near-term impacts of these shifts over the next one to three years are the need to manage emerging load growth and uncertainty, enable timely interconnection of new resources, and address reliability risks associated with aging infrastructure and more dynamic system conditions. While longer-term transmission solutions are being evaluated, Maine will face increasing pressure to implement near-term, no-regrets solutions that can be deployed quickly within existing rights-of-way. This includes improving the utilization of the existing system to increase transfer capability, reduce operational constraints, and enhance flexibility. Technologies like advanced conductors are particularly well-suited to meet these needs, as they can be implemented on accelerated timelines and provide meaningful capacity and efficiency benefits without the cost, permitting challenges, and long lead times associated with new transmission development.

Objective A Part 4 – Objective A: Deliver Affordable Energy

Question A1: How should the energy plan define energy affordability?

Energy affordability should be defined using a comprehensive set of metrics that capture total system costs, including generation, transmission, distribution, and losses over time. In Maine, affordability is closely tied to how efficiently the existing grid can be utilized and expanded to meet evolving needs such as electrification and new resource integration. When evaluating transmission solutions, planners should consider total lifecycle costs, including capital investment, operating efficiency, and the ability to defer or avoid more expensive infrastructure. Reconductoring existing lines with advanced conductors, such as ACCC, can increase capacity and improve efficiency within existing rights-of-way, reducing the need for more capital-intensive upgrades and helping to deliver lower overall costs for consumers.

Question A2: How should the energy plan prioritize energy affordability while also ensuring modern and reliable energy infrastructure and meeting other goals?

Energy affordability should be pursued alongside reliability by prioritizing cost-effective, scalable solutions that can be implemented in both the near and long term. In Maine, this includes maximizing the capability of existing infrastructure while also advancing longer-term transmission solutions through regional planning processes. Both near-term upgrades and longer-term investments should be evaluated in a coordinated manner to ensure the most efficient use of existing assets and rights-of-way. Upgrading existing transmission assets can provide meaningful improvements in capacity, efficiency, and system flexibility at a lower cost and on a faster timeline than new construction. Planning should emphasize lifecycle cost analysis, including capital costs, operational efficiency, and the ability to defer future investments, to achieve affordability, reliability, and public policy objectives in a coordinated and cost-effective manner.

Objective B: Reliability and Resilience

Question B1: Please comment on how grid resilience, reliability, and security should be considered in Maine energy planning and how the state should be tracking/considering reliability and resilience in this Plan?

Grid resilience, reliability, and security should be evaluated not only through traditional outage metrics, but also through the ability of the transmission system to safely and efficiently handle increasing loads, operate within thermal limits, and maintain required clearances under a range of operating conditions. Advanced conductors, such as ACCC, can directly enhance these capabilities by providing up to approximately 2x the capacity of conventional lines, reducing bottlenecks and improving system flexibility. Their low-sag, high-strength composite supports improved clearance performance, which can help reduce the risk of outages and safety incidents. The state should therefore track metrics such as thermal constraint frequency, line loading, line losses, and clearance performance, in addition to outage metrics, to more fully capture resilience improvements enabled by modern transmission technologies.

Question B2: Are there new technologies or innovative solutions to advance reliability and resilience?

Yes. Advanced conductors, such as ACCC conductors, represent a commercially proven, high-impact solution to improve both reliability and resilience. By increasing transmission capacity on existing infrastructure, ACCC helps reduce system constraints and provides additional headroom during peak demand and emergency conditions. Its composite core design delivers high strength

and reduced sag, improving line safety and supporting more consistent clearance performance under higher operating temperatures. At the same time, ACCC reduces line losses by up to approximately 40%, lowering system inefficiencies and reducing the need for additional generation. Importantly, these benefits can be deployed rapidly through reconductoring, avoiding the long timelines and permitting challenges associated with new transmission construction, and enabling utilities to strengthen system performance within months rather than years.

Question B4: Please comment on whether any statutory, regulatory, or policy changes are needed to support access to information about critical energy reliability and resilience topics across all energy sectors in Maine.

Targeted policy and regulatory updates could improve how information is used in planning processes rather than simply increasing transparency. This includes more standardized reporting and consistent use of transmission system performance metrics such as line loading, thermal constraints, and losses in utility and state-level planning. In addition, planning processes should require consistent evaluation of a range of solutions, including advanced transmission technologies, using comparable assumptions. Strengthening how this information is incorporated into planning will support more informed decision-making and help identify cost-effective opportunities to enhance system reliability and resilience.

Objective D: Efficient Technologies

Question D2: Comment on opportunities to increase the efficient utilization of the electric grid.

Opportunities to increase the efficient utilization of the electric grid are centered on maximizing the performance of existing infrastructure. Reconductoring transmission lines with advanced conductors can significantly increase capacity and reduce losses without requiring new rights-of-way, improving overall system efficiency. Enhancing grid utilization can also reduce system constraints, lower wholesale energy costs, and enable more effective integration of flexible demand and clean energy resources. These approaches allow Maine to defer or avoid more costly infrastructure investments while still meeting growing energy demand.

III. CONCLUSION

CTC Global appreciates the opportunity to contribute to the development of the 2027 Maine Energy Plan and encourages DOER to prioritize solutions that maximize existing infrastructure, accelerate deployment timelines, and address transmission needs as a key factor of affordability, reliability, and clean energy integration.

/s/ Theodore Paradise

Theodore Paradise
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SCE Saved \$87M & Increased Line Capacity

Utility:	Southern California Edison
Line configuration:	230 kv 137-mile single circuit line
ACCC [®] conductor installed:	411 conductor miles
Project objective:	SCE needed to rebuild 137 miles of the Big Creek transmission corridor to mitigate sag violations

Project details with traditional vs ACCC[®] conductor

	ACSR	ACCC [®]
Rebuild/retrofit required:	Yes	No
Conductor type:	ACSR Dove	ACCC [®] Dove
Project cost:	\$135M	\$48M
Time to completion:	48 months	18 months

ACCC[®] Solution



1

Increased line capacity

Increased the line's rating from 936 amps to 1520 amps, adding **60%+ more capacity**

2

Sag violation mitigation

Realized **40% improvement in line sag**, mitigating all violations and increasing overall line safety

3

Reduced line losses

Reduced line loss by 30% enabling conservation of generation capacity and saving \$85M in customer costs



Reconductoring with ACCC[®] vs rebuilding saved years of time in permitting and construction, provided significant environmental advantages, and saved tens of millions of dollars in project costs.

SCE

AEP Saved \$43M & Increased Line Capacity

Utility:	American Electric Power
Line configuration:	345kV 120-mile double circuit line
ACCC® install base:	1,440 miles
Project objective:	Increase capacity to accommodate load growth. N-1 line could not take the outage and a rebuild require high capex with 3-4 year timeline

Project details with traditional vs ACCC® Conductor

	ACSR	ACCC®
Rebuild/retrofit required:	Yes	No
De-energizing required:	Yes	No
Conductor type:	ACSR Drake	ACCC® Drake
Project cost:	\$418M	\$375M
Time to completion:	66 months	33 months

ACCC® Solution



1

Increased line capacity faster & at lower cost

Increased the line's capacity by 80% (1751 amps to 3099 amps) while saving \$43M and ~9 months on the project

2

Upgrade completed with uninterrupted service

Temporary single-phase line designed to replace 240 mi while energized – largest of the type in the world

3

Reduced line losses

Reduced line loss by 30% enabling energy conservation by freeing up 34 MW of generation capacity



These benefits, and the savings realized by completing the project while the line remained energized, have saved consumers tens of millions of dollars.

James Berger, (former) Director of Transmission

ACCC® Conductor Projects Examples



Converted **rebuild to reconductor** project
137 mi ACCC® installed
65% savings in up-front project cost

*"We have used ACCC® to **effectively mitigate sag infractions, increase efficiency, capacity, and reliability** of many of our transmission lines. SCE has decreased fire risk and **built a more resilient grid and are continuing to deploy ACCC® at very rapid and cost-effective pace.**"*

Mustafa Ali, Chief Engineer



Reconductor to **2X capacity**
27 mi ACCC® installed
\$10M savings in up-front project cost

*"By utilizing new technology, we were able to **minimize the impact on the local community and keep the power flowing.** The increase in capacity will go a long way to accommodate growth in renewable electricity in the area and **support the transition to net zero.**"*

Rob McDonald, Managing Dir of Transmission



Reconductor **linking new renewable generation**
122 mi ACCC® installed
2X line capacity for critical energy backbone

*"We have tested InfoCore many times over the last two years, and we are seeing **real-world results that indicate this solution is quick and reliable.** Now we are looking down the line at what is to come and are **very excited by the planned developments we are seeing at CTC Global.**"*

Elia Group, Expert Primary Systems



Reconductor project **without de-energizing line**
1,440 mi ACCC® installed
\$43M savings in up-front project cost

*"The savings realized by completing the project while **the line remained energized, have saved consumers tens of millions of dollars.** We developed a lot of ACCC® testing with Kinetrics and I tell people that **ACCC® is probably the most tested conductor that I've ever been involved with.**"*

James Berger, (former) Director of Transmission



Reconductor project
94 mi ACCC® installed
2x line capacity to accommodate data centers

*"We have been **using ACCC® in Northern Nevada as we've gotten data centers onto our system** as new line builds so that we can **get higher capacity out of our lines. Our internal crews prefer working with ACCC® to a bundled configuration** and so we've standardized ACCC® and love using it."*

Devon Kendall, (former) Manager of Civil & Transmission Engineering

Other Recent Projects



Reconductor project
91 mi ACCC® installed



Green Field project
47 mi ACCC® installed



Reconductor project
34 mi ACCC® installed



The Efficiency Maine Trust (the Trust) appreciates the opportunity to offer comments in response to the 2027 Maine Energy Plan Request for Information (RFI).

As a general matter, the Trust recognizes the unique role that the Maine Department of Energy Resources (DOER) Energy Plan provides to inform and shape agendas for energy research and energy policy in Maine and the region. Updating the analysis of where things stand in Maine's energy landscape, and indicating the priorities of State government provides actionable insights for a wide range of stakeholders, policymakers, regulators, and the public. The Trust deeply appreciates the time and thought that DOER invests every two years to bring forward, in a single document, a comprehensive treatment of data, issue spotting, and recommendations about energy in Maine.

The Energy Plan is designed to be comprehensive and therefore covers a very wide range of issues, some of which are outside the Trust's scope of experience or expertise. The Trust does not attempt here to comment on every question posed in DOER's RFI. Instead, the Trust's focuses its comments in three general areas.

First, the Trust's comments here and throughout the planning process will attempt to provide whatever help is needed to ensure that DOER's plan has access to the most current, accurate data and analysis for characterizing Maine's energy landscape. In particular, the Trust stands ready to share the past results and future forecasts of the Trust's programs. These programs are generally market-based and promote customer-sited resources to help Maine's homes, businesses and institutions manage their energy consumption and provide grid flexibility through increased energy efficiency, demand management and beneficial electrification.

Second, the Trust seeks to promote clarity around roles and responsibilities among Maine's complementary network of agencies and initiatives. Our aim in this regard is to advocate for a plan that satisfies the directives of the Maine Legislature and supports Maine's energy consumers, vendors and suppliers without duplicating efforts, introducing confusion or "friction" in the marketplace, or leaving important needs unaddressed. We do not think the Legislature intended to have the Trust's Triennial Plan relitigated in this forum after it has already been the subject of a lengthy stakeholder process, approved by the Trust Board, and litigated at the Maine Public Utilities Commission (PUC). In the event that the Energy Plan will reference programs or initiatives administered by the Trust, we would ask that it defer to the current 2026-2028 Triennial Plan, and any updates to the Triennial Plan as approved by the PUC, as to the programs' characterizations and the strategies to be employed. We also would appreciate the opportunity to confer with DOER on any and all aspects of the Triennial Plan and the Trust's programs that DOER seeks to reference in its Energy Plan.

Should DOER or stakeholders engaging in the Energy Plan process have questions or comments regarding programs or initiatives run by the Trust, the Efficiency Maine Trust Act provides ample processes for reviewing and evaluating the Trust's programs and individual measures. We respectfully submit that the

most appropriate forum for those questions and comments is in the Trust's ongoing process for developing and updating its Triennial Plan, or through direct outreach to the Trust staff.

The Trust acknowledges that the 2025 Energy Plan was written in such a way as to provide a high-level overview of the Trust's programs, and complement and support the Trust's efforts, while providing additional resources or insight in areas that fall outside of the purview of the Trust. The Trust is hopeful that a similar approach and outcome can be achieved in the 2027 Energy Plan.

Third, the Trust seeks to help the Energy Plan identify and characterize barriers to market transformation for energy efficiency, demand management and beneficial electrification that could be addressed, in whole or in part, through changes to existing policies.

The Trust's comments on specific questions posed in the RFI are presented below.

Part 2: Maine's Energy Landscape

A. Which market, policy, or economic shifts that have occurred in 2025/2026 do you consider to be the most consequential for energy planning in Maine, and why?

The past year has seen significant market, policy and economic shifts in Maine. Chief among these shifts are 1) the unexpected termination of federal tax credits for heat pumps, EVs, and other energy measures 2) new tariffs, increasing the price of heat pump components, 3) increased electricity prices in Maine, which tend to reduce the spread between oil and electric heating costs, 4) rising labor costs impacting costs of installation, 5) disruptions in the supply chain due to the transition to new types of refrigerants. Current policies and regulations on interconnection (of devices to the grid) also pose a significant challenge to the adoption of DERs. These shifts have generally tended to increase the costs of customer-sited DERs and add friction to the consumer's purchasing process. The result, at least through the Spring of 2026, has been a significant reduction in uptake of electric vehicles (EVs), a slow-down in the growth rate of heat pump sales, and increased challenges to marketing batteries.

The recent altercations in the Middle East have obviously caused a dramatic change in prices of petroleum products. These price changes could be very impactful on Maine, but as of this writing the longer term implications are unclear. If nothing else, the rapid fluctuations in prices of gasoline, diesel, heating oil and kerosene should serve as a stark reminder of the benefits of increasing Maine's energy independence.

B. As it relates to Maine, what are the most important near-term impacts of these changes (over the next 1-3 years) that should be addressed through this Energy Plan or planning process?

- a. The Trust notes that impacts specific to aspects of the Trust's programs, such as reduced forecasts in rebated measures, should not be addressed in this Energy Plan, and instead should be addressed through the Trust's Triennial Plan process through existing mechanisms like the Annual Update and Significant Change process. That said, there is significant opportunity for DOER to address in its Energy Plan some of the barriers that pose challenges for the Trusts programs. Specifically, the Trust has several recommendations about areas of policy that this Energy Plan could highlight and discuss to help remove those barriers, which we elaborate on in objective B, 4.

Part 3: Updating the Objectives of the Maine Energy Plan

A. Are the objectives from the 2025 Energy Plan still relevant? If not, what updates or changes would you suggest?

Objective D currently reads: "Deploy efficient technologies to reduce energy costs." The Trust strongly supports continuing to make deployment of efficient technologies a top priority in Maine.

The Trust respectfully suggests that objective D be modified to more clearly acknowledge the Trust's role of planning and administering market-based programs to lower energy costs in Maine by promoting the purchase, installation and increased use of customer-sited systems, devices and procedures.¹ To avoid market confusion and maximize the efficiency and effectiveness with which the Trust's demand-side management programs are administered,² we respectfully ask the Energy Plan to make clear that it is not contemplating or recommending that multiple programs from multiple State entities should duplicate efforts to deploy efficient technologies through market-based programs or procurements. Consistent with these principles of administration articulated by the Legislature, we respectfully ask that the Energy Plan defer to the Trust's Triennial Plan for programs and strategies on deploying efficient technologies when customer-sited. Instead, we encourage the Energy Plan to focus on policies that would help improve the economics and logistics for

¹ See, e.g., Efficiency Maine Trust Act, Title 35-A, §10103(1), which states that "The Efficiency Maine Trust is established for the purposes of developing, planning, coordinating and implementing energy efficiency and alternative energy resources programs in the State;" See also, *Id.*, §10103(1)(B)(6), which explains that part of the Legislative intent in establishing the Trust was: "Simplifying and enhancing consumer access to technical assistance and financial incentives relating to energy efficiency and the use of alternative energy resources by merging or coordinating dispersed programs under a single administrative unit possessing independent management and expertise..." Similarly, it would be appropriate for the Energy Plan to acknowledge the role that MaineHousing and the CAPs play in deploying efficiency measures for qualified low-income households.

² *Id.*, §10104(2).

Mainers seeking to market and/or purchase efficient technologies to reduce their energy costs. Revising Objective D to instead be about creating an environment for the deployment of efficient technologies to reduce energy costs could reflect this recommendation.

B. What data, underlying assumptions, or analyses from the 2025 Energy Plan should be revised or prioritized in the 2027 plan?

It is important that the 2027 Energy Plan accurately portrays both the amount/quantity and timing of grid needs driven by electrification. Forecasting beneficial electrification adoption is challenging in normal times and the recently volatile policy and market environments are compounding that complexity. We strongly encourage the Energy Plan to acknowledge actual, measured load growth during the most recent years and ensure that future forecasts make reasonable assumptions about how rapidly it could grow in the years ahead. Based on the Trust's own analysis, recent ISO-NE CELT forecasts clearly overstate per-unit demand of heat pumps and EVs in Maine, resulting in overstated forecasts of load growth from electrification. The forecasts provided in the Integrated Grid Plans of both Central Maine Power Company and Versant Power reflect grid needs from CELT 2024, which have since been revised downwards in the 2025 and 2026 CELT forecasts. It is important that as Maine electrifies, it does not overbuild the grid infrastructure and related resources to address future needs too far in advance of when the need has arrived. Deferring unnecessary investments is in the best interest of Maine ratepayers. The Trust welcomes opportunity to collaborate on assumptions related to beneficial electrification and demand management impacts on the load forecast.

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

Objective A Questions

2. How should the energy plan prioritize energy affordability while also ensuring modern and reliable energy infrastructure and meeting other goals?

In the future, there will be grid needs driven by electrification. Ensuring that these needs are addressed and paid for in a timeframe that is calibrated to and consistent with actual, measured load growth (and reasonable forecasts built off that load growth) is important to ensure energy affordability. Overestimating the amount of additional grid capacity needed, and building it much faster than it will actually be needed, will drive unnecessary cost before there is additional load across which to spread it. We elaborate more on this point in Part 3, B.

Additionally, modern grid systems will play an important role in unlocking future savings for consumers. The Trust has observed that Maine's utilities lack certain modern information

technology infrastructure capable of fully compensating customer-sited resources that can shift and shape customer load and avoid specific T&D investments. For example, neither CMP nor Versant have systems in place to fully and accurately measure, track and retain the time-value of energy delivered to the grid by distributed resources like solar and batteries. Current utility systems for load settlement erase the time-value of unaccounted-for-energy (UFE). This systemic barrier significantly undermines the economics of exports to the grid from residential and small business consumers. The Energy Plan could make an important contribution by evaluating what systems are needed to maximize the value of customer-sited resources and how to prioritize investments in these systems.

3. What strategies would help ensure energy affordability for households and communities with the highest energy burdens?

- a. The Trust's primary focus is on market-based programs designed to help scale and maximize consumers' energy savings through the use of energy efficiency, demand management, and beneficial electrification. It would be useful for the Energy Plan to remind readers that each of these resources delivers benefits for all ratepayers, including those who do not directly participate in the programs that promote them. Certain demand management resources can be particularly valuable in reducing the costs of the grid, which is a benefit that is enjoyed by all ratepayers. For example, in 2026 the Trust will develop and launch an outreach and education campaign to increase participation in the State's transmission and distribution utilities opt-in time-of-use (TOU) rates to encourage shifting electricity consumption to off-peak periods. Even if households do not participate in the TOU rate or shifting load to off-peak periods, they will benefit when others do so. The same can be said of the Trust's other demand management initiatives, like the Small Battery Incentive (a Virtual Power Plant, or "VPP", initiative) and the Off-Peak Charger Initiative. And as discussed in the Triennial Plan, Beneficial Electrification measures, such as heat pumps and certain EV sales, help to decrease utility distribution rates for all consumers by spreading the utility's fixed costs across more kilowatt hours.

7. Please comment on expected trends for energy demand in Maine.

- a. The Trust has observed slowed electrification adoption in 2025 and 2026 and, as noted in its March 1, 2026 Annual Update to Triennial Plan VI, is forecasting a continuation of this reduced growth through the summer of 2028.³ The Trust expects the slowed pace of electrification adoption to be reflected in future ISO-NE CELT forecasts and elsewhere. Please see the Trust's response to question 2A for a description of drivers of this slowed pace of adoption. The Trust welcomes the opportunity to collaborate on assumptions

³ Efficiency Maine Trust, 2026 Annual Update, Docket No. 2024-00310, March 12, 2026.

about beneficial electrification and demand management growth in load forecasts utilized in the Maine Energy Plan.

Objective B Questions

2. Are there new technologies or innovative solutions to advance reliability and resilience?

- a. One pathway to promoting reliability and resiliency is through the non-wires alternative (NWA) process prescribed in 35-A M.R.S Section 3132-C and 3132-D. In the right circumstances, a behind the meter intervention like batteries or a wider micro-grid could be lower cost to ratepayers than a traditional wires solution and presents new technologies and innovative solutions to advance reliability and resilience.

4. Please comment on whether any statutory, regulatory, or policy changes are needed to support access to information about critical energy reliability and resilience topics across and or all energy sectors in Maine.

- a. The Trust has several recommendations of areas of policy that it would like to see this Energy Plan identify and/or address to remove barriers to Trust programs and the deployment of beneficial electrification. These include:
 - i. Improving utility processes for interconnection of residential batteries, by addressing arbitrary screens and streamlining processes for batteries;
 - ii. Improving ISO NE assumptions for interconnection: the ISO-NE interconnection process currently tests all projects over 1 MW exporting during low-load conditions. This is not a realistic assumption for batteries and poses unnecessary barriers to battery interconnections;
 - iii. Improving building codes to streamline the process for Heat Pump Water Heater (HPWH) adoption;
 - iv. Advocating for UL approval of a wider range of refrigerants in heat pumps;
 - v. Revising market rules to support more comprehensive and accurate compensation for the time-value of DERs: As mentioned in part 4, question 2, current systems for load settlement erase the time-value of unaccounted-for-energy (UFE). This systematic barrier significantly harms the economics of residential exports to the grid; and
 - vi. Improving FERC standards that make flexible interconnection effectively non-viable.

5. What emerging risks or resilience challenges should the state consider when planning for energy security, and what general approaches, resources, tools, or technologies may help address challenges and improve information sharing and coordination?

- b. As mentioned in Part 4, 2, the Trust has observed that Maine's utilities lack modern information technology infrastructure capable of fully tracking and compensating



customer-sited resources that can shift and shape customer load and avoid specific T&D investments.

Objective D Questions

The Trust observes that elements of objective D as described in the RFI, lie squarely within the Trust's statutory duties and obligations. Objective D in the RFI is entitled "Deploy Efficient Technologies to Reduce Energy Costs." The RFI indicates that Objective D includes the following strategies:

1. advance beneficial electrification and weatherization to reduce energy costs and increase overall grid efficiency,
2. leverage electrified technologies to unlock grid benefits for consumers, and
3. expand Maine's EV charging network.

The Trust underscores its position that the 2027 Maine Energy Plan should not duplicate the Trust's role and duties to plan, coordinate, and implement energy efficiency, demand management and beneficial electrification programs in Maine. Should the Energy Plan reference programs or initiatives administered by the Trust, we ask that it accurately reflects the current 2026-2028 Triennial Plan and any updates to this plan as approved by the PUC. If DOER or stakeholders have questions or comments regarding programs or initiatives run by the Trust, we ask that these topics be referred to the Trust to be addressed but not be included in this plan.

It is important to the efficient and effective functioning of the Trust's programs that DOER's Energy Plan signals to the marketplace that Maine's rules, procedures, messages and strategies for promoting efficient technologies are those found in the Triennial Plan and the program materials used in the Trust's implementation of that plan. Additionally, we understand that advocates for lower energy costs will likely be concerned about the potential for duplicative efforts to unnecessarily burden ratepayer or taxpayer funds.

The Trust's programs advance the affordability of energy in the state and stand up important sectors of the economy. As noted in response to part 3, question A, revising Objective D to instead focus on creating an environment for the deployment of efficient technologies to reduce energy costs could easily address this concern and further strengthen the valuable independence of the Trust's programs.

- 1. Please comment on any opportunities for increased energy efficiency in any sector in Maine, including opportunities to advance specific technologies (i.e.: weatherization, wood heat, combined heat and power, heat pumps, etc.) or associated policies.**

The Trust notes that as part of its statutory obligation, it has made an assessment of the maximum achievable cost effective (MACE) program activity for all electricity measures that fall into the categories of energy efficiency, demand management, and beneficial

electrification. If new technologies (or practices) enter the market showing promise, the Trust may pilot them to establish their cost-effectiveness and eligibility to be included in MACE. Similarly, existing measures that were previously considered to be not cost-effective may later become cost-effective if they experience significant changes in cost, performance, or energy prices. The Trust may review the cost-effectiveness of measures at any time. Once added to eligibility for MACE, the Trust will amend its Triennial Plan to incorporate the new technologies (or practices), subject to approval by the Trust Board and the Maine PUC. The Trust would encourage the Energy Plan to refer readers to Triennial Plan VI on the Trust's website for further analysis of cost-effective opportunities in Maine. Weatherization and Wood Heat are not characterized as "electricity measures" in the Trust's analysis of MACE, but the Trust does fund them within available budgets using RGGI funds, settlement funds (e.g., NECEC), federal grants, and revenues from the Thermal Energy Investment Program.

2. Comment on opportunities to increase the efficient utilization of the electric grid.

- a. See answer to 3, A below.

3. Comment on opportunities to expand load flexibility resources, particularly through voluntary consumer-enabled mechanisms.

- a. For context regarding the Legislative intent around the role of the Trust and its Triennial Plan on load flexibility resources, the Efficiency Maine Trust Act states that:

The trust shall consider, without limitation, conservation programs that:

...

(4) Reduce the price of electricity over time for all consumers by reducing or shifting demand for electricity or balancing load, including by the implementation of beneficial electrification and energy storage systems; and

(5) Reduce total energy costs for electricity consumers in the State by increasing the efficiency with which electricity is consumed.⁴

As noted elsewhere, the Efficiency Maine Trust Act also directs the Trust to analyze and identify the Maximum Achievable Cost-Effective potential for demand-side electricity resources, and to articulate plans and budgets for programs that are sufficient to develop those resources.⁵ The results of that work are reflected in Triennial Plan, which

⁴ *Id.*, § 10110(2)(A).

⁵ *Id.*, § 10104(4)(A), states: "The triennial plan must identify the maximum achievable cost-effective energy efficiency savings, as defined by rule by the trust, and related programs that could be implemented pursuant to [Electricity

is updated annually and reviewed and approved, after a full stakeholder engagement process, by both the Board of Trustees and the Maine Public Utilities Commission.

The DOER Energy Plan is well positioned to enumerate barriers to load flexibility resources and potential policy solutions, infrastructure investments, and utility rate designs to help overcome those barriers. Doing so would be a valuable contribution to advancing Maine's energy goals. With regard to opportunities for programs promoting customer-sited load flexibility resources, however, we respectfully request that the Energy Plan defer to and cross-reference the Trust's Triennial Plan and programs in order to minimize duplication of efforts and the risk of sending mixed messages.

4. Comment on opportunities to cost-effectively expand Maine's EV charging network as well as other clean or more efficient transportation technologies.

- a. The Trust has participated in and supports the Plan for Electric Vehicle Infrastructure Development (PEVID) developed by the Maine DOT, the Trust and others for expanding Maine's public EV charging network. We respectfully request deferring to and cross-referencing the PEVID plan in order to minimize duplication of efforts and the risk of sending mixed messages.

Conservation Programs and Natural Gas Conservation Programs], the costs and benefits of such programs and the basis and support for such identified costs and benefits.”

See also *Id.*, §10104(4)(F), which directs the Trust's to set forth in the Triennial Plan the Trust's programs that advance the following goals: “... (3) Reducing peak-load demand for electricity by the maximum achievable cost-effective amount; (4) Achieving the maximum achievable cost-effective electricity and natural gas program savings...; (7) Promoting the purchase of high-efficiency heat pump systems ...; and (8) Promoting the purchase of battery electric vehicles and plug-in hybrid electric vehicles”

See also *Id.*, §10110(4-A), which provides that: “The commission shall ensure that transmission and distribution utilities on behalf of their ratepayers procure through the trust the maximum achievable cost-effective electric energy efficiency and conservation resources ...”

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

Locals 104 • 1837 • 490 • 567 • 1253

Comments in Response to the
2027 MAINE ENERGY PLAN
Request for Information

Submitted to:
Maine Department of Energy Resources
doer@maine.gov | Subject: "Energy Plan RFI"

April 27, 2026

Who We Are

IBEW Local 1837

Utility workers at Central Maine Power and Versant Power — the men and women who operate, maintain, and restore Maine's electric distribution system every day.

IBEW Local 104

Outside lineworkers performing transmission and distribution construction, storm restoration, new line construction, and substation work across Maine.

IBEW Locals 490, 567, and 1253

Inside construction electricians who build substations, industrial facilities, commercial projects, and other energy infrastructure across Maine.

I. Introduction

Who is submitting these comments and why

The International Brotherhood of Electrical Workers (IBEW) Locals 104, 1837, 490, 567, and 1253 respectfully submit these comments in response to the Maine Department of Energy Resources (DOER) Request for Information issued March 25, 2026, regarding the development of the 2027 Maine Energy Plan.

Our members are not observers of Maine's energy system — they are the ones who build it, maintain it, and restore it when storms knock it down. IBEW Local 1837 represents the utility workers employed by Central Maine Power (CMP) and Versant Power. IBEW Local 104 represents the outside lineworkers who construct and maintain transmission and distribution infrastructure throughout the state. IBEW Locals 490, 567, and 1253 represent inside construction electricians who build substations, commercial facilities, and other energy infrastructure across Maine. Together, our members represent thousands of highly skilled, well-trained, family-sustaining careers rooted in Maine communities.

We submit these comments because the 2027 Maine Energy Plan will shape investment in Maine's grid, the pace of the clean energy transition, and the conditions under which energy workers are employed for the next decade and beyond. We want DOER to get this plan right — for Maine ratepayers, for Maine workers, and for the long-term reliability of the energy system our members are trusted to operate.

Our comments are organized around four core themes: (1) affordability must be grounded in transparent, Maine-specific cost analysis; (2) grid reliability and resilience depend on investing in the workforce and infrastructure that exists today; (3) any clean energy transition must protect and expand existing union energy jobs, not just count future ones; and (4) Maine should evaluate new policy models on their actual merits for Maine conditions, not adopt frameworks from other states without independent scrutiny.

We address the RFI questions in Parts 2 through 5 below, referencing question numbers as requested by DOER.

II. Maine's Energy Landscape (RFI Part 2)

RFI Questions: Part 2A, 2B, 2C, 2D

Part 2A — Most Consequential Market, Policy, and Economic Shifts Since 2025

Federal Policy Uncertainty

The most consequential shift since the 2025 Energy Plan was released is the significant uncertainty surrounding federal clean energy incentives. The Inflation Reduction Act tax credits, direct pay provisions, and grant programs that underpinned much of the investment case for Maine's clean energy buildout are now subject to ongoing Congressional review and potential rescission or modification. DOER must update the 2027 Plan's resource cost assumptions and investment projections to reflect realistic scenarios in which federal support is reduced, delayed, or restructured — not assume that 2022-era IRA terms will persist through 2040.

Continued Electric Rate Pressure

Maine residential electricity rates remain among the highest in the continental United States. A significant driver of this is the cost of existing state-mandated programs — including Renewable Portfolio Standard compliance costs, storm recovery surcharges, and efficiency program charges — that appear as line items on utility bills. The 2027 Plan must honestly assess the cumulative rate impact of programs already in place before recommending new mandates that add further cost obligations. Ratepayers are reaching the limits of what they can absorb, and any new initiative that increases bills without delivering clear, verifiable savings will accelerate public distrust of the state's energy policies.

Storm Damage and Grid Recovery Costs

Maine ranked third in the nation in 2024 for both total outage events and average outage duration. The storms of 2023 and 2024 resulted in more than \$90 million in public infrastructure damages. Storm recovery costs are ultimately passed through to ratepayers. This is a structural problem, not a weather anomaly, and it demands a structural response: sustained, adequate investment in distribution infrastructure hardening, vegetation management, and lineworker staffing — not primarily technology solutions layered on top of an aging, inadequately maintained physical grid.

Supply Chain and Materials Cost Inflation

The cost of copper, aluminum, transformers, switchgear, and other grid components has increased substantially. These are the materials our members use to build and maintain Maine's infrastructure. Cost projections in the 2025 Plan that assumed pre-2022 materials pricing require revision. Any new procurement targets or infrastructure investment plans in the 2027 Plan must be based on current and realistic forward-looking cost assumptions.

Part 2B — Near-Term Impacts (1–3 Years)

In the near term, DOER should prioritize:

- Updating all resource cost and bill impact modeling to reflect current federal policy uncertainty, materials cost inflation, and interest rate conditions
- Accelerating distribution system hardening investments in circuits with the highest outage frequency, using existing MPUC grid planning processes
- Ensuring that planned clean energy procurements are financeable under current market conditions — not premised on tax credits or subsidies that may not materialize
- Protecting and supporting the traditional energy workforce as the transition proceeds, recognizing that these workers are also Maine ratepayers and community members

Part 2C — Financial Decisions at Household and Private Sector Level

High energy bills are reshaping household financial decisions across Maine. Families are delaying home improvements, including efficiency upgrades, because of the upfront cost barrier — even when long-term savings are clear. Small businesses report that energy costs are a significant competitive constraint. The 2027 Plan must recognize that programs accessible only to those with upfront capital or strong credit exclude the households with the highest energy burdens. Any electrification or efficiency program must be designed with accessible financing for low- and moderate-income households and small businesses.

Part 2D — Impacts on Socially Vulnerable Communities

Energy burden is most severe in Maine's rural communities, where income levels are lower, homes are older and less efficient, and alternative transportation is impractical. These are also the communities where our members live and work. Programs that raise bills for the purpose of funding clean energy development impose the sharpest hardship on these households. Any new mandate or surcharge must be assessed for its distributional impact by income decile and geographic area, with explicit protections or offsets for low-income households.

III. Updating the Objectives (RFI Part 3)

RFI Questions: Part 3A, 3B

Part 3A — Are the 2025 Objectives Still Relevant?

The five objectives of the 2025 Energy Plan — affordability, reliability and resilience, responsible clean energy advancement, deployment of efficient technologies, and clean energy career opportunities — remain broadly sound. IBEW supports this framework. However, we recommend that DOER strengthen two aspects:

First, affordability must be elevated in priority relative to the other objectives. The 2025 Plan's strategies sometimes treat affordability as a downstream benefit of clean energy deployment rather than as an independent, binding constraint. Any strategy or action that cannot be shown to deliver net bill savings — or that imposes costs exceeding its measurable benefits — should not be adopted. Affordability is not a secondary concern; for many Maine households, it is the only concern.

Second, Objective E should be expanded to explicitly protect and grow the existing utility and construction workforce, not only focus on the creation of new clean energy jobs. Maine's traditional energy workers — utility lineworkers, substation electricians, system operators — are the backbone of grid reliability. Their jobs must be central to the workforce strategy, not treated as a legacy sector to be managed through attrition.

We recommend DOER add an explicit sixth objective or strengthen Objective E to read: "Protect, expand, and transition Maine's existing energy workforce as the foundation for a reliable, affordable clean energy future."

Part 3B — Data, Assumptions, and Analyses to Revise

The following specific data and assumptions from the 2025 Plan require revision in the 2027 Plan:

- All resource cost projections should be updated to reflect current materials costs, interest rates, and realistic federal incentive scenarios
- Energy demand forecasts should include sensitivity cases for slower electrification, higher-cost scenarios, and reduced consumer adoption rates — not only the core pathway scenario
- The 2025 Plan's analysis of the Maine Pathways to 2040 Technical Report should be supplemented with Maine-specific, consumer-level bill impact projections under each scenario — not just system-level cost estimates
- Workforce projections should disaggregate existing utility operations, transmission and distribution maintenance, substation construction, and line construction jobs from projected new clean energy employment — with explicit analysis of impacts on incumbent workers
- Storm costs and grid resilience data should be updated to incorporate the most recent outage statistics and to quantify the economic cost to Maine communities of the current outage frequency and duration

IV. Objective A — Deliver Affordable Energy (RFI Part 4, Objective A)

RFI Questions: A1, A2, A3, A4, A5, A6, A7

A1 — Defining Energy Affordability

Energy affordability should be defined as the total annual out-of-pocket cost of all energy — electricity, heating fuel, and transportation fuel — measured as a share of household income ("energy burden") across income deciles and geographic areas of the state. A definition focused only on electricity rates, or only on system-level cost metrics, misses the full picture of what Maine households pay and where the burden falls most heavily.

Affordability should be assessed at the household level — in dollars on actual bills — not only at the level of program cost-benefit ratios or aggregate system savings. A program that delivers regional market savings of tens of millions of dollars but raises the average residential electric bill by five dollars per month is not, in practice, an affordability program for the families paying that bill.

A2 — Prioritizing Affordability While Meeting Other Goals

The 2027 Plan should adopt an explicit affordability screen: before any new procurement mandate, program surcharge, or policy initiative is recommended, DOER should publish transparent modeling of the projected household and business bill impact under both optimistic assumptions and realistic downside scenarios, including cost overruns and reduced federal support.

Where multiple pathways to a clean energy goal exist, DOER should select the pathway that delivers the greatest affordability benefit to ratepayers. Goals that impose costs without demonstrated savings should be re-scoped, delayed, or redesigned rather than implemented on the ratepayer's back.

A3 — Strategies for Highest-Burden Households

For households with the highest energy burdens — typically rural, lower-income households in older homes heating with oil or propane — the most effective strategies are:

- Accessible, low- or no-cost weatherization programs that reduce baseline energy consumption, with no upfront capital required from participants
- On-bill financing mechanisms that allow households to access efficiency upgrades and heat pump installation with repayment tied to bill savings, eliminating the upfront cost barrier
- Targeted low-income utility rate relief that directly reduces the bill burden for households below income thresholds, without requiring participation in specific programs
- Grid hardening investments that reduce the frequency and duration of outages, which impose severe economic and safety costs on rural households dependent on electric heat

All weatherization and efficiency programs funded by ratepayer dollars should require the use of certified contractors with demonstrated training standards and appropriate wage levels. Quality installation is an affordability tool — poorly installed equipment does not deliver promised savings and creates safety risks.

A4 — Metrics for Tracking Affordability Progress

DOER should track and publicly report:

- Average and median annual household energy burden by income decile and by county
- Average monthly residential electric bill, absolute and as a share of median household income
- Incremental bill impact of each major state program or mandate, reported separately and transparently
- Percentage of residential customers on low-income rate assistance programs, and average bill savings from participation
- Number and duration of major outage events annually, and estimated economic cost to affected households and businesses

A5 — Other Approaches to Reduce Costs and Price Volatility

IBEW recommends DOER consider the following additional approaches:

Grid Hardening as an Affordability Strategy. Reducing outage frequency and duration directly reduces the economic cost of energy interruptions for Maine households and businesses. Sustained capital investment in distribution system hardening — pole replacement, wire upgrades, circuit undergrounding in the highest-outage areas, and vegetation management — is one of the most direct affordability investments the state can make. These are also exactly the investments that employ IBEW members in Local 104 and inside construction locals on substation and infrastructure projects.

Firm, Price-Stable Baseload Resources. The 2027 Plan should evaluate the role of firm, low-carbon resources — including existing and potential new hydropower, nuclear, and biomass — in providing price-stable baseload generation that reduces Maine's exposure to natural gas price volatility. The 2025 Plan correctly identified natural gas price volatility as a key driver of electricity cost increases. Resources that are not subject to fuel price volatility provide a structural hedge for ratepayers.

Honest Assessment of Existing Program Costs. A meaningful portion of Maine ratepayers' current electric bills reflects the cost of programs already in place — RPS compliance, storm recovery, efficiency program surcharges, and transmission charges. The 2027 Plan should quantify what these existing programs are costing the average household before recommending additional obligations. Ratepayers deserve transparency about the full cost of existing policy commitments.

A6 — Energy Supply Resources

Regarding energy supply resources relevant to Maine's 2027 plan:

Transmission and Distribution Infrastructure. The single most consequential energy supply-side investment DOER can recommend is the modernization and hardening of Maine's transmission and distribution system. Without adequate T&D capacity, no generation resource can reliably deliver energy to Maine customers. IBEW Locals 104, 1837, 490, 567, and 1253 represent the workforce that builds and maintains this infrastructure. Investment in T&D is investment in Maine's grid reliability and in Maine union jobs.

Hydropower. Maine's existing hydropower resources are a firm, renewable, price-stable asset. DOER should evaluate opportunities to improve or expand generation capacity at existing hydro sites and assess the feasibility of pumped storage hydropower, which can provide critical balancing capacity for an increasingly variable grid. These projects would create significant construction employment for IBEW members.

Nuclear Energy. IBEW supports the inclusion of nuclear energy in Maine's clean resource evaluation. Advanced nuclear technologies — including small modular reactors — represent a potential source of firm, carbon-free power that complements variable renewable resources. DOER should conduct a serious feasibility and cost analysis rather than dismissing nuclear on the basis of past assumptions that may not apply to emerging technologies.

Offshore Wind — With Conditions. Offshore wind can provide meaningful winter reliability and fuel-hedging benefits for Maine and New England. IBEW supports responsible development of offshore wind, provided that: (1) cost projections are based on current, realistic figures — not pre-2022 assumptions that have been superseded by significant cost increases and project cancellations across the Northeast; (2) the construction, installation, operation, and maintenance of offshore wind infrastructure serving Maine ratepayers is performed under strong labor agreements with IBEW-represented workers; and (3) the Energy Plan treats offshore wind cost claims as testable hypotheses requiring Maine-specific analysis, not as assumptions drawn from regional studies.

Natural Gas. Natural gas will remain an important component of New England's generation mix for the foreseeable future, particularly as a complement to variable renewables during periods of low wind and solar output. The 2027 Plan should reflect this reality in its resource adequacy planning rather than assuming natural gas can be phased out on a timeline that exceeds what the system can reliably support.

A7 — Energy Demand Trends

IBEW anticipates that Maine's electricity demand will grow over the planning horizon, driven by continued heat pump adoption, EV charging, and data center and industrial load. This demand growth will require:

- Significant capital investment in distribution infrastructure — substations, feeder upgrades, transformer capacity — to accommodate new load without degrading reliability
- Adequate lineworker staffing at CMP and Versant to connect new customers, maintain system reliability, and respond to storm damage
- Proactive grid planning that identifies where distribution capacity constraints will bind first and programs investment accordingly

The demand growth projections in the 2025 Plan's core pathway scenario should be stress-tested against slower adoption scenarios to ensure that grid investment plans are not premised on electrification timelines that may not materialize.

V. Objective B — Reliability and Resilience (RFI Part 4, Objective B)

RFI Questions: B1, B2, B3, B4, B5

B1 — Reliability and Resilience in Maine Energy Planning

IBEW members live with Maine's reliability problem every day. Maine ranked third in the nation in 2024 for both total outage events and average outage duration. This is not primarily a technology gap — it is a physical infrastructure and workforce challenge. The 2027 Plan should be unambiguous about this diagnosis.

Maine's transmission and distribution system is aging, densely forested, and severely exposed to wind and ice storms. Addressing this requires:

- Sustained, multi-year capital investment in pole replacement, reconductoring, circuit undergrounding in the most outage-prone areas, and substation hardening
- Adequate vegetation management programs — adequate in funding, scope, and cycle length — to keep trees clear of distribution lines before storm events create emergencies
- Lineworker staffing levels at CMP and Versant that reflect the current and projected maintenance burden and storm response requirements
- Substation and communication system upgrades that improve grid automation, fault isolation, and restoration speed

Reliability Metrics. DOER should establish explicit, publicly reported reliability targets — SAIDI (System Average Interruption Duration Index) and SAIFI (System Average Interruption Frequency Index) — that are binding on Maine's utilities, with transparent reporting of actual performance against those targets. Lineworker staffing levels and storm response capacity should be treated as reliability metrics alongside the technical indices.

B2 — New Technologies for Reliability and Resilience

IBEW supports targeted deployment of technologies that genuinely improve reliability:

- Automated switching and fault isolation systems that reduce the number of customers affected by outages and accelerate restoration
- Distribution automation and advanced metering infrastructure that give utilities better real-time visibility into grid conditions
- Battery storage at strategic substation locations to improve local reliability during outage events
- Microgrids in island communities and other locations where grid connection is inherently fragile

However, IBEW urges DOER to recognize that these technologies complement, rather than replace, the physical infrastructure and skilled workforce that grid reliability depends on. No amount of grid automation eliminates the need for lineworkers to replace damaged poles and wire after a major storm. Technology investments should be paired with, not substituted for, investment in the core distribution system and the workforce that maintains it.

B3 — Delivered Fuel Resilience

Maine's extreme dependence on home heating oil — the highest in the nation — is a genuine energy security vulnerability. A supply disruption or extreme price spike during a Maine winter imposes severe hardship on households and can endanger lives. The 2027 Plan should address this vulnerability by:

- Accelerating cost-effective transition to electric heat where grid reliability makes this a viable substitute — which requires the grid hardening investments described above
- Supporting strategic fuel oil reserve capacity in Maine to buffer against short-term supply disruptions
- Recognizing that fuel delivery workers are an important part of Maine's energy workforce and that any transition away from delivered fuels must include support for workers in that sector

B4 — Statutory, Regulatory, and Policy Changes Needed

IBEW recommends DOER consider the following:

- Strengthen MPUC authority to require utilities to meet explicit, binding reliability performance standards with consequences for underperformance
- Ensure that storm recovery cost mechanisms provide timely recovery for utilities while maintaining ratepayer protections against inefficient spending
- Require that any utility integrated grid plan submitted to the MPUC include explicit analysis of lineworker staffing adequacy for both routine maintenance and major storm events

B5 — Emerging Risks and Resilience Challenges

The 2027 Plan should address the following emerging resilience risks:

- Cybersecurity: as the grid becomes more automated and digitally connected, cybersecurity threats to operational technology become more consequential. Utility workers must be trained and equipped to identify and respond to cyber incidents affecting grid operations.
 - Climate-driven storm intensification: the frequency and severity of winter storms, ice storms, and high-wind events is increasing. Maine's grid hardening investment must be scaled to the projected future climate, not the historical average.
 - Increased demand during cold snaps: as more Maine homes rely on electric heat pumps, extreme cold events create peak demand spikes that stress both the generation and distribution system simultaneously. Demand management programs and adequate reserve capacity must be planned for these events.
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VI. Objective C — Responsibly Advance Clean Energy (RFI Part 4, Objective C)

RFI Questions: C1, C2, C3, C4, C5, C6, C7

C1 — Competitive Solicitation Targets

IBEW supports DOER's statutory authority to conduct regular, scheduled competitive solicitations for clean energy resources. A predictable solicitation schedule reduces uncertainty and financing costs for developers and creates a clearer pipeline of work for the construction workforce.

For the next three competitive solicitations, IBEW recommends that DOER:

- Establish solicitation targets that are grounded in updated, current-market cost assumptions — not projections that predate recent materials cost inflation, supply chain disruptions, and changes in federal incentive availability
- Include strong labor standards in all solicitation requirements — prevailing wage, registered apprenticeship utilization, and project labor agreement conditions — as enforceable contract requirements, not aspirational preferences
- Prioritize resources that contribute to both clean energy goals and grid reliability: firm resources, storage, and transmission and distribution infrastructure
- Ensure that procurement targets are set at levels that Maine's construction and utility workforce can absorb — scaling up faster than the workforce can support creates quality, safety, and cost problems.

C2 — Offshore Wind Considerations

Maine and New England have significant long-term interest in offshore wind development. IBEW supports responsible development of this resource. However, DOER must ensure that the 2027 Plan's treatment of offshore wind is grounded in current, realistic cost analysis.

Since the 2025 Energy Plan was drafted, the Northeast offshore wind industry has experienced:

- Multiple project cancellations and contract renegotiations due to cost increases substantially exceeding original projections
- Supply chain constraints that are extending project timelines and raising costs
- Significant uncertainty about the future of federal offshore wind support

The 2027 Plan should conduct an independent, Maine-specific analysis of offshore wind cost per MWh delivered, translated into projected household and business bill impacts, before recommending specific procurement targets. Any offshore wind development serving Maine ratepayers should include binding commitments that installation, operations, and maintenance work is performed under strong IBEW labor agreements. Floating offshore wind in the Gulf of Maine remains a promising long-term resource, but requires continued technology development and should not be assumed at commercial scale within the 2027 planning horizon.

C3 — Advanced Nuclear Technologies

IBEW supports a serious evaluation of advanced nuclear technologies for Maine. Small modular reactors (SMRs) and other advanced nuclear designs represent potential sources of firm, carbon-free, price-stable generation that could significantly improve Maine's resource adequacy and reduce dependence on volatile natural gas markets. DOER should:

- Conduct a fair, rigorous feasibility and cost analysis of advanced nuclear technologies applicable to Maine's scale and grid context
- Evaluate the workforce implications — advanced nuclear construction and operation would create significant high-skill employment opportunities for IBEW members
- Engage with ISO-New England on how advanced nuclear would interact with regional capacity and energy markets

C4 — Hydropower, Pumped Storage, and Geothermal

These are areas where IBEW members have significant potential employment interest:

Hydroelectric Improvements. Upgrades to existing hydro facilities — including turbine upgrades, control system modernization, and dam safety improvements — represent relatively near-term opportunities to increase clean, firm generation capacity while employing IBEW construction workers. DOER should prioritize this low-risk, proven resource.

Pumped Storage Hydropower. Maine's topography in several areas may be suitable for pumped storage development, which would provide critical grid balancing capacity as variable renewable penetration grows. Pumped storage construction is a major, multi-year capital project that would employ significant numbers of IBEW members. DOER should work with the Legislature to identify and evaluate potential sites.

Geothermal. District geothermal systems on brownfield sites represent a promising application that could reduce heating costs in specific communities while creating construction employment. IBEW inside construction locals are well-positioned to install and maintain geothermal systems. DOER should identify pilot project opportunities and develop clear standards for system design and installation.

C5 — Renewable Portfolio Standard and Clean Energy Standard

IBEW supports Maine's existing RPS framework and the development of a complementary Clean Energy Standard that includes nuclear and large-scale hydro. The inclusion of firm, clean resources in the CES is important for resource adequacy and helps ensure that clean energy policy supports grid reliability alongside emissions reduction.

In reviewing the RPS and CES, DOER should evaluate the cumulative cost impact of compliance obligations on ratepayers and ensure that the compliance pathway is achievable under realistic market conditions and without requiring cost-ineffective procurements.

C6 — Financial Barriers to Clean Energy Deployment

Financial barriers to clean energy deployment should be addressed through:

- On-bill financing programs that allow ratepayers to access clean energy investments without upfront capital, with repayment tied to bill savings
- Green bank or revolving loan fund mechanisms that lower the cost of capital for qualifying projects while maintaining cost discipline

-
- Conditioned public financing: any public financing mechanism should require that supported projects meet strong labor standards — prevailing wage, registered apprenticeship, project labor agreements — as conditions of receiving subsidized financing
 - Transparent cost-effectiveness standards: public financing should be conditioned on demonstrated net bill savings or clearly justified reliability and resilience benefits; ratepayers cannot be the open-ended backstop for projects that do not deliver

C7 — Transmission and Distribution Infrastructure

DOER should treat T&D infrastructure investment as a central pillar of clean energy policy — not a supporting element. Without adequate T&D capacity, no clean energy resource can reliably reach Maine customers.

Specifically, DOER should recommend:

- Sequenced planning that ensures T&D investment is programmed before or concurrent with resource procurement, not after — building generation that cannot be reliably delivered is wasteful and costly
- Priority investment in circuits with the highest interconnection queue backlog, which are preventing clean energy projects from connecting to the grid
- Explicit recognition in the Energy Plan that the workers who build and maintain Maine's T&D system — IBEW Locals 104, 1837, 490, 567, and 1253 — are the workforce that makes clean energy delivery physically possible
- Updated T&D workforce needs analysis, including the number of journeymen lineworkers, inside electricians, and utility system operators required to build and maintain the grid envisioned by the 2027 plan's resource portfolio

VII. Objective D — Deploy Efficient Technologies (RFI Part 4, Objective D)

RFI Questions: D1, D2, D3, D4

D1 — Energy Efficiency Opportunities

IBEW strongly supports cost-effective energy efficiency as a first-priority resource. Efficiency that delivers genuine, verifiable bill savings is the most direct form of ratepayer protection. DOER should prioritize:

- Weatherization programs targeting Maine's oldest, least efficient housing stock, which is disproportionately occupied by low-income households and rural residents
- Heat pump installation programs with accessible financing and strong contractor certification requirements — installation quality determines whether heat pumps deliver promised savings
- Combined heat and power for appropriate commercial and industrial applications
- High-efficiency commercial building upgrades, including lighting, HVAC, and building envelope improvements

All ratepayer-funded efficiency programs should require the use of certified contractors with demonstrated training and quality standards, with wage levels that support family-sustaining employment. Work performed by under-trained, underpaid contractors produces inferior results and does not deliver the promised savings to ratepayers.

D2 — Efficient Utilization of the Electric Grid

The most important step toward more efficient grid utilization is reducing the frequency and duration of outages through the physical infrastructure investments described under Objective B. Beyond that, DOER should support:

- Distribution automation that improves fault isolation, reduces outage extent, and enables faster restoration
- Advanced metering infrastructure that provides customers with real-time usage data and enables time-of-use pricing to shift demand away from peak periods
- Substation upgrades that reduce losses and improve power quality

These investments require skilled electrical workers — IBEW members — for design, installation, and ongoing maintenance. The 2027 Plan should recognize that grid modernization is a workforce investment as well as a technology investment.

D3 — Load Flexibility Resources

Load flexibility — using controllable loads like EV chargers, heat pump water heaters, and battery storage to shift demand away from peak periods — can provide meaningful system benefits. IBEW supports development of load flexibility resources with the following conditions:

- Customer participation must be truly voluntary, with no adverse consequences for customers who do not participate
- Programs must be designed with cybersecurity as a first-order requirement — distributed control of residential devices creates potential attack surface for adversaries
- Benefits of load flexibility programs should be shared equitably between participating customers and the broader ratepayer base

D4 — EV Charging Network

Expansion of Maine's EV charging network creates direct employment opportunities for IBEW inside construction locals and outside lineworkers who install the electrical infrastructure supporting charging stations. DOER should ensure that:

- Public EV charging infrastructure funded by state programs is installed by qualified, licensed electrical contractors with appropriate training and wage standards
 - The EV charging buildout is coordinated with distribution capacity planning to avoid situations where charging demand exceeds available grid capacity in specific areas
 - Utility infrastructure upgrades required to support EV charging (substation upgrades, distribution feeder reinforcement) are funded and sequenced to keep pace with charging network expansion
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VIII. Objective E — Workforce and Clean Energy Careers (RFI Part 4, Objective E)

RFI Questions: E1, E2, E3, E4, E5, E6, E7

E1 — Workforce Trends, Needs, and Priorities

Maine's energy workforce needs are evolving rapidly, but the foundation of that workforce is already here: the utility workers, lineworkers, and electricians represented by IBEW Locals 104, 1837, 490, 567, and 1253. The 2027 Plan must start from this existing workforce and build forward — not treat the transition as requiring an entirely new workforce while the current one fades.

Specific workforce trends DOER should address:

- An aging workforce demographic: a significant share of experienced lineworkers and utility system operators will be eligible for retirement within the next decade. Succession planning and apprenticeship pipeline development are urgent.
- Growing technical complexity: grid automation, battery storage systems, advanced metering infrastructure, and new interconnection standards require ongoing training and skills development for existing workers.
- Clean energy construction demand: offshore wind, solar, hydro upgrades, substation expansion, and EV infrastructure will require substantial construction workforce capacity. Maine's registered apprenticeship programs — operated by IBEW and the electrical industry — are the most reliable pipeline for trained, safe, productive workers.
- T&D workforce capacity: the scale of distribution system upgrades required to accommodate clean energy goals and electrification demand will require significant increases in the number of qualified outside lineworkers. This pipeline takes years to develop through registered apprenticeship and cannot be improvised.

E2 — Job Quality and Family-Sustaining Careers

The 2027 Plan should adopt explicit job quality standards as a condition of any state investment in or procurement of clean energy resources and infrastructure:

- Prevailing wage requirements for all publicly supported construction projects
- Registered apprenticeship utilization requirements for major construction projects, ensuring that workers are trained through structured, safety-focused programs
- Project labor agreements on major public infrastructure projects, ensuring labor-management coordination, dispute resolution, and workforce continuity
- Anti-misclassification protections to ensure that workers on publicly supported projects are properly classified as employees, not independent contractors, and receive appropriate benefits and protections

The measure of success for Objective E should not only be the number of clean energy jobs created — it should be whether those jobs are family-sustaining, safe, and accompanied by pathways for advancement. IBEW registered apprenticeship programs have provided this for decades in Maine's energy sector. Any workforce development initiative supported by the state should build on this proven model.

E3 and E4 — Economic Development and Traditional Energy Workers

Energy is foundational to Maine's economy. Affordable, reliable energy is a precondition for business investment, manufacturing, and economic development across all sectors. The 2027 Plan should recognize that energy policy decisions that raise business energy costs or reduce reliability directly undermine economic development goals.

Workers in traditional energy sectors — including fuel delivery, natural gas distribution, and conventional generation — are Maine workers too. They are our neighbors and our members. The 2027 Plan should explicitly address how these workers will be supported as the energy mix evolves:

- Bridge programs and retraining opportunities that give traditional energy workers first access to new clean energy positions
- Portable benefits and pension bridge support for workers displaced by energy sector transitions
- Recognition that the skills of experienced lineworkers, electricians, and energy system operators are directly transferable to clean energy construction and operations — these are not two different workforces

E5, E6, and E7 — Innovation, Research, and Clean Energy Partnership

IBEW supports Maine's investment in clean energy innovation, including offshore wind technology development at the University of Maine, tidal energy research, and grid technology programs. We recommend that workforce development be integrated into research and demonstration projects from the outset — not added as an afterthought. Specifically:

- Any publicly funded clean energy demonstration project should include a registered apprenticeship or on-the-job training component for Maine workers
- Clean Energy Partnership programming should prioritize partnerships with IBEW's existing apprenticeship programs, which have proven track records and established training infrastructure
- Maine's community colleges and vocational-technical programs should develop curriculum in close coordination with the IBEW and the electrical construction industry to ensure graduates are job-ready for the specific skills Maine employers need

IX. Additional Considerations (RFI Part 5)

RFI Questions: Part 5, Items 1 and 2

The Relationship Between Bills and Public Trust

IBEW urges DOER to take seriously the political and social dimension of energy affordability. Maine ratepayers are asking legitimate questions about what is driving their bills. When answers are not provided clearly and honestly, the frustration often falls on the most visible parts of the energy system: the utilities and the workers who operate them. IBEW members employed by CMP and Versant are their neighbors' first point of contact with the energy system. They hear the complaints and feel the distrust.

The 2027 Energy Plan has an opportunity to rebuild that trust — by being honest about costs, transparent about tradeoffs, and grounded in the practical realities of Maine's grid. A plan that commits to goals without showing the price tag, or that assumes federal subsidies that may not materialize, sets up Maine workers and ratepayers for disappointment and blame. A plan that is realistic, transparent, and prioritizes affordability can rebuild confidence that Maine's energy policy is working for everyone.

IBEW as a Resource and Partner

The IBEW Maine locals are not simply advocates for our members' interests — we are a resource for DOER in developing the 2027 plan. Our members have practical, ground-level knowledge of Maine's grid: where it is most vulnerable, where capacity is constrained, where the highest-priority investments should be made, and what skills the workforce needs to support the clean energy transition.

We request that DOER:

- Convene a technical working session with IBEW Locals 104 and 1837 focused specifically on grid reliability, lineworker staffing, and T&D investment priorities
- Include IBEW labor representatives in any stakeholder advisory process for the 2027 plan development
- Engage IBEW apprenticeship programs in the development of workforce projections and training capacity assessments

We are committed to a clean energy future for Maine — one that is affordable, reliable, and built by Maine's skilled union workforce. We look forward to continued engagement with DOER throughout the 2027 planning process.

X. Conclusion

The IBEW Maine Locals — representing utility workers, outside lineworkers, and inside construction electricians across the state — respectfully submit these comments to inform the development of the 2027 Maine Energy Plan. Our recommendations are grounded in four principles that we believe should guide the plan:

- **Affordability first:** every major policy recommendation must be grounded in transparent, Maine-specific cost analysis that shows the impact on actual household and business bills. Ratepayers cannot be an unlimited backstop for programs that promise savings but do not deliver them.
- **Invest in the grid we have:** Maine's most urgent energy challenge is the reliability and resilience of its existing distribution system. Sustained capital investment in T&D infrastructure and adequate lineworker staffing is the single most important step toward both reliability and affordability.
- **Protect and expand existing energy jobs:** Maine's utility workers, lineworkers, and electricians are the backbone of the clean energy transition. Workforce strategy must start with these workers, protect their jobs, and build new clean energy opportunities on top of — not instead of — what already exists.
- **Evaluate new models on their merits for Maine:** the 2027 Plan should draw on experience from other states and regions, but must stress-test any policy framework against Maine's specific conditions — its small size, rural character, high existing bills, and limited ratepayer capacity for additional cost obligations.

Maine's energy future should be cleaner, more affordable, and more reliable. Our members are committed to building and maintaining that future. We look forward to working with DOER, the Legislature, the Maine PUC, and all stakeholders to develop an Energy Plan that serves Maine people and communities well.

Respectfully submitted,

International Brotherhood of Electrical Workers

Local 104 | Outside Construction and Line Work

Local 1837 | Utility Workers at Central Maine Power and Versant Power

Local 490 | Inside Construction, Local 567 | Inside Construction, Local 1253 | Inside Construction

Submitted to: Maine Department of Energy Resources | doer@maine.gov

Subject: Energy Plan RFI | April 27, 2026

Sunday, April 26, 2026

To: doer@maine.gov

Re: Energy Plan RFI

Islesboro islands Trust Comments on the 2027 Maine Energy Plan Request for Information

Islesboro Islands Trust is a non-profit, charitable conservation land trust that, with support from hundreds of members, serves the Penobscot Bay community of Islesboro and its surrounding areas. We are deeply aware of the need for appropriate development to address carbon emissions and climate change and agreed to serve on the Offshore Wind Port Advisory Group (OSWPAG). IIT applauds our State Government's vigorous response to climate change and offshore wind research. However, we cannot over-emphasize the crucial importance of applying strong, proven environmental standards and existing state policies to siting and construction the least environmentally damaging offshore wind port. Fully functioning ecosystems and their conservation provide a highly effective climate change response.

RESPONSES TO THE QUESTIONS OF INTEREST

Part 1: Engaging in Maine's Energy Plan

A. What recommendations do you have regarding the best ways to engage and solicit feedback from the public throughout the energy planning process in calendar year 2026?

According to state sources, "MaineDOT created an Offshore Wind Port Advisory Group to advise the state on port development." However, evidence demonstrated that the purported OSWPAG purpose never sought advice but instead sought support for a preconceived conclusion to develop Sears Island. According to a Stakeholder Management Plan dated September 8, 2021, well in advance of any OSWPAG meeting, which IIT received through a FOAA request, the real OSWPAG goal was "To develop and execute a stakeholder outreach strategy that would enable Governor Mills to announce a commitment to pursue development of Sears Island as the Renewable Energy Port of the Northeast..."

Stakeholder engagement and solicitation of feedback absolutely must be sincere, open and transparent, providing sufficient opportunity for questions and comments and then actually incorporating public feedback into policy decision.

The blatant deception of the OSWPAG process must be avoided at all costs.

DOER needs to conduct well publicized open, in-person, meetings and workshops throughout Maine but especially in coastal communities most impacted by Offshore Wind manufacturing, assembling and launching facilities.

D. Are there specific topics that you would most like to see covered in public meetings or workshops?

Specific topics that should be covered in public meetings or workshops must include the plans for an OSW port that will assemble and service the proposed OSW development in the Gulf of Maine.

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

Objective A. Deliver Affordable Energy for Maine People and Businesses. Question 6.C.
Comment on available information, data, or provide feedback on energy supply resources or potential resources in Maine. Topics of interest include, but are not limited to:

- a. Current/existing resources and operations**
- b. Feasibility and opportunities for development of new or expansion of existing resources**
- c. Land-use and siting considerations**
- d. Technologies and other relevant characteristics that may influence deployment**

Maine's *Offshore Wind Roadmap* includes the following at Objective E: "Maine is committed to protecting and preserving the Gulf's marine species, habitats, and wildlife, and to pursuing responsible development of offshore wind technology that advances renewable energy with as few adverse impacts as possible." [Emphasis added.]

The Maine Climate Council's *Plan for Climate Action, Maine Won't Wait*, says in part: "Climate change and development are harming Maine's natural and working lands and waters, which are key to the state achieving its carbon neutrality commitment by 2045. Protecting natural and working lands from development maintains their potential to draw back carbon from the atmosphere, as well as provide important co-benefits. Maine's coastal and marine areas also store carbon, while supporting our fishing, aquaculture, and tourism industries." [Emphasis added.]

Therefore, As Maine pursues the development of renewable energy in order to address the climate crisis, Maine policy and common sense require integrating conservation and proper-siting of renewable energy infrastructure into responsible decision-making. There exist better alternatives to building an OSW facility on Sears Island. Already industrialized Mack

Point and Cousins Island represent superior OSW sites. Or Maine might use two or more ports to accomplish specific steps in the multi-faceted process of manufacturing, assembling and then finally launching turbines.

Redevelopment of an existing industrial site or sites is crucial, instead of destroying an intact ecosystem which already sequesters carbon.

As the Alliance for Sears Island, which Islesboro Islands Trust fully supports, reports:

Intact forests and ecosystems are among the best tools for mitigating greenhouse gas emissions, according to a report by the International Panel on Climate Change. Intact and biodiverse coastal habitat, like that found on Sears Island, is extremely rare. The State of Maine's Carbon Budget, Version 2.0 identifies forestland as the most significant factor removing greenhouse gases from the atmosphere through carbon sequestration. Sierra Club has established strategic goals to address the climate crisis. Protecting 30% of our lands and waters from development by 2030 is a vital first step toward protecting intact ecosystems and restoring damaged ecosystems. Sears Island's forests and wetlands sequester 88,750 metric tons of carbon, the equivalent of emissions from 74,000 cars per year. According to the Nature Conservancy's land use mapping tool, by 2050 the island will sequester 96,685 metric tons of carbon. Destroying forested acres and carbon-sequestering wetlands for wind power is counterproductive. Conserving lands and waters is crucial in addressing the extinction and climate crises. Siting renewable energy facilities on structures or lands which have already been developed is preferable to impacting lands and waters which remain in their natural state. Redevelopment of existing industrial or developed sites is critical for conserving biodiversity, habitat connectivity, climate refugia, carbon sequestration, and food or water security.

Islesboro Islands Trust (IIT) supports permanent protection of Sears Island and the development of an offshore wind facility at Mack Point, if any such facility is to be built in Penobscot Bay.

Thank you for this opportunity to provide comments relevant to the 2027 Maine Energy Plan.

Stephen Miller
Islesboro islands Trust Executive Director Emeritus
iitsmill@gmail.com

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

April 27, 2026

RE: Maine Audubon's 2027 Maine Energy Plan Request for Information Comment

Dear Acting Commissioner Burgess:

Maine Audubon thanks the Maine Department of Energy Resources (DOER, Department) for the opportunity to submit comments in response to its Request for Information (RFI) regarding Maine's 2027 Energy Plan. Since 1843, Maine Audubon has worked to conserve Maine wildlife and wildlife habitat by engaging people in education, conservation, and advocacy. The oldest and largest Maine-based conservation organization, Maine Audubon has eight public centers and sanctuaries across the state; 30,000 members, volunteers, and supporters; and connects with more than 250,000 people annually.

Below you will find Maine Audubon's responses to a selection of the RFI's questions that align most closely with our organization's mission.

Part 1: Engaging in Maine's Energy Plan

A. What recommendations do you have regarding the best ways to engage and solicit feedback from the public throughout the energy planning process in calendar year 2026?

Maine Audubon recommends that DOER solicit feedback outside of its normal channels and engage as many people as possible early and often throughout the energy planning process. Many people who would normally be interested in this process are not subscribed to DOER emails or notifications. It would be beneficial for the Department to lean into the networks of nonprofits, such as Maine Audubon, who have large member bases to share solicitations for feedback. Furthermore, DOER should strive to follow-up on feedback in order to establish a more meaningful engagement process. DOER should also engage in in-person town hall meetings throughout the state, especially during times when people are not working.

B. Are there any regional or geographical considerations DOER should consider when planning outreach and engagement?

As energy infrastructure, energy needs, and impacts on wildlife vary across the state, it is critical that engagement with people from all regions of the state is conducted broadly and meaningfully. Making sure outreach is widespread and consistent is important when taking into account these variations – especially when it comes to limiting the impacts of energy projects on wildlife habitat and communities and securing local support for renewable energy development. Comprehensively reviewing a region’s history with energy development generally through a human dimensions lens will help inform the creation of curated engagement plans where communities feel heard and included and thus more likely to improve public acceptance outcomes.

C. Is your organization interested in participating in stakeholder meetings, small group discussions, or having DOER present to your organization?

Yes, Maine Audubon is interested in participating in stakeholder meetings, small group discussions, and having DOER present to Maine Audubon staff. Climate change is the most pervasive threat facing wildlife in Maine and it is critical that the state continues its work building a renewable energy future. In order to assist the state in accomplishing that goal in a wildlife friendly manner, Maine Audubon would be eager to be a part of the process.

D. Are there specific topics you would most like to see covered in public meetings or workshops?

In order to safeguard Maine wildlife from the impacts of climate change, it is essential for the state to accelerate its transition to a cleaner, more sustainable future. However, building out this future must be done in a wildlife-responsible manner so as to not place additional pressures on wildlife. In addition to understanding how the agency generally plans on prioritizing and procuring clean energy over other energy types, understanding how DOER reviews and prioritizes projects that have minimal impacts on the environment and are primarily sited and developed to reduce impacts on wildlife is critical. Sharing this type of information as early in the process as possible is essential for receiving constructive feedback from stakeholders with expertise, like ours, who have spent years offering guidance to companies and communities exploring opportunities to mitigate impacts of large-scale renewable energy projects. .

E. What are the best ways to connect with and include socially vulnerable counties and communities in the energy planning process?

Maine Audubon believes one of the best ways to connect with and include socially vulnerable counties and communities is to meet people where they already are and to offer multiple participation options. Using different formats at different times will allow for more people to be included in the state’s energy planning process and reduces the likelihood of disadvantaging any particular community.

Additionally, DOER should utilize tools such as [EJScreen](#)¹ tool or other similar resources to help identify vulnerable communities, and partner with trusted community leaders and organizations to help DOER better connect with vulnerable communities. Lastly, Maine Audubon recommends that DOER engage meaningfully with the four federally recognized tribes in Maine: Houlton Band of Maliseet Indians, Mi'kmaq Nation, Penobscot Nation, and the Passamaquoddy Tribe. Wabanaki people have lived in this place we now call Maine for millenia with an understanding of and connection to natural resources far deeper than ours today and they should be consulted on all aspects of the energy planning process.

Part 3: Updating the Objectives of the Maine Energy Plans

A. Are the objectives from the 2025 Energy Plan still relevant? If not, what updates or changes would you suggest?

Overall, the objectives from the 2025 Energy Plan are still relevant but we encourage the Department to continue highlighting progress made over the past few years while simultaneously reporting on components that have seen little momentum and how the 2027 Energy Plan builds upon those successes and addresses shortfalls. Additionally, wildlife and habitat considerations of different development options should be incorporated more broadly within the plan. In the 2025 Energy Plan, wildlife impacts were only mentioned once while habitat impacts were never mentioned. Energy development can negatively impact wildlife and their habitat, and those impacts should be and can be addressed more thoroughly, especially in Objective C: *Responsibly Advance Clean Energy*. Maine Audubon urges the Department to incorporate well-established guidance widely available to decision makers and developers, such as [Maine Audubon's 2019 Renewable Energy and Wildlife in Maine](#) report.

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

Objective B: Ensure Maine's Energy Systems are Reliable and Resilient in the Face of Growing Challenges

2. Are there new technologies or innovative solutions to advance reliability and resilience?

As mentioned previously, Maine Audubon believes that Maine must accelerate its transition to a more sustainable energy future while ensuring that the transition is done in a wildlife-responsible manner. Part of this transition includes improving Maine's resilience to the impacts of climate change. The State of Maine and DOER should continue to invest in the conservation and restoration of

¹ Note: US EPA removed public access to its EJScreen tool. The provided link is an exact copy developed by environmental researchers and organizations.

climate-resilient ecosystems that help provide natural protection against the impacts of climate change. For example, blue carbon ecosystems, including mud flats, salt marshes, and eelgrass meadows offer Maine natural resilience to the impacts of climate change by storing carbon, reducing coastal flooding and infrastructure damage, among others. Investing in protecting these ecosystems is critical to defending our state's energy infrastructure and progress. To help finance this work, part of the procurement process for new projects could incorporate requirements to invest in and help restore climate resilient ecosystems.

Embracing new technologies and cutting-edge techniques will undoubtedly increase energy reliability and help reduce development demands. For example, utilizing new tools such as smart metering will help make Maine's energy usage more efficient and reliable and continuing to invest in offshore wind while procuring energy storage on land will help drastically increase energy reliability while reducing the need for new energy generation on land. Furthermore, co-locating transmission with existing infrastructure and utility corridors is a practical way to reduce impacts on ecosystems and wildlife while simultaneously increasing Maine's transmission capacity.

Objective C: Responsibly Advance Clean Energy

Before answering the following questions, it is important to reiterate that Objective C of the 2025 Energy Plan is the only area where balancing wildlife priorities with energy development is mentioned. We hope that in the 2027 Plan, wildlife and habitat considerations continue to be acknowledged in this section in addition to being integrated more robustly throughout the entire 2027 Energy Plan.

2. *What offshore wind data, research, information, or other considerations should be considered in the development of the energy plan?*

Maine Audubon believes that offshore wind development should be the renewable energy priority for the State of Maine. While the development of offshore wind has endured setbacks due to policy decisions at the federal level, we believe that this is the perfect time to continue to collect data on offshore wind and form key community collaborations to ensure that the development of this renewable energy source begins in earnest once conditions change federally. In the meantime, continued investment in studies that identify impacts on wildlife and fisheries should be prioritized and DOER should be committed to openly sharing data and regularly updating findings as new information becomes available. Additionally, it is important for DOER to consider important partner collaborations in its energy plans. Collaborating with groups such as the [Regional Wildlife Science Collaborative](#) is valuable to coordinate regional offshore wind efforts in a way that protects marine life. At the same time, DOER should continue to evaluate transmission pathways, both where energy will make landfall and the potential for offshore transmission hubs. Incorporating these evaluations into the 2027 Energy Plan can help Maine stay on track with its offshore wind goals.

4. *In consultation with other state agencies, evaluating the role of hydroelectric power generation, pumped hydro storage, and geothermal systems in meeting Maine's energy and climate goals. Please comment on:*

b. Characteristics of locations in the state that might be suitable for pumped storage hydropower system development.

Maine Audubon supports the procurement and development of pumped storage hydropower if it is done in a wildlife-responsible way and locational characteristics can assist the state in accomplishing both. Choosing locations that require the least amount of development, such as areas with established natural reservoirs or areas close to established transmission, are examples of locations that are more suitable for pumped storage hydropower. In general, projects should, to the extent practicable, avoid sensitive habitats, including wildlife movement corridors and large blocks of relatively unfragmented or interior forest habitat. Lastly, incorporating thorough analysis of closed-loop systems versus open-looped systems should be included in the 2027 Energy Plan. Each system type presents its own environmental challenges and should be fully vetted before implementation.

c. Considerations for developing district geothermal systems on brownfield sites in the state.

Regardless of the type of development, Maine Audubon encourages utilizing previously disturbed sites such as brownfields for projects. Prioritizing disturbed areas conserves and protects intact wildlife habitat elsewhere.

Conclusion

In closing, Maine Audubon appreciates the opportunity to submit comments that will help guide Maine's 2027 Energy Plan. As Maine continues taking steps to embrace a more sustainable energy future, it is essential that energy development be planned in a way that avoids, minimizes, and mitigates impacts to wildlife and their habitats. Maine Audubon looks forward to additional opportunities to collaborate with DOER on how to best balance the development of clean and affordable energy with the protection of our state's natural resources.

Sincerely,



Anthony Erwin
Policy Advocate

Maine Climate Action Now

April 27, 2026

On behalf of [Maine Climate Action Now](#), a statewide coalition of 18 grassroots organizations which fights for climate justice, thank you for the opportunity to provide comments to inform the development of the 2027 Maine Energy Plan.

As the Department of Energy Resources considers this plan, we ask you to keep frontline communities, others historically excluded from the climate conversation, and the equitable implementation of clean renewable energy at the forefront. A successful just transition needs to be affordable, accessible and equitable.

Comments:

Part 1: Engaging in Maine's Energy Plan

A. What recommendations do you have regarding the best ways to engage and solicit feedback from the public throughout the energy planning process in calendar year 2026?

and

B. Are there any regional or geographic considerations DOER should consider when planning outreach and engagement?

We recommend that DOER engages meaningfully with each of the four federally recognized tribes in five communities in Maine, as well as the Wabanaki Sustainable Energy Team (through the Mitchell Center at UMaine Orono), for the energy planning process in 2026. An example of “meaningful” engagement might mean engagement on multiple occasions, located in the tribal communities, at varied times of day, and with compensation for tribal citizen leaders if desired.

Learning from the traditional ecological knowledge these sovereign nations hold is important to create a holistic Energy Plan. Including these communities is also important because they see some of the highest energy burdens in the state, are potentially located near future energy infrastructure buildout, and often have the least resources or recourse to harms caused by the externalities created by energy infrastructure.

C. Are you or your organization interested in participating in stakeholder meetings (virtual or in-person), small group discussions, or having DOER present

Maine Climate Action Now

to your organization or community about the planning process? If so, what format works best for you?

Yes, MCAN Staff and representatives of our coalition members are interested in participating in virtual stakeholder meetings. We would appreciate discussing and sharing our coalition's diverse interests and ideas in small groups with DOER.

D. Are there specific topics that you would most like to see covered in public meetings or workshops?

There are multiple ways to meet our energy needs as a state. One is by building out our energy infrastructure to accommodate potential needs. Another is by becoming more efficient and reducing the need for energy (reducing load demand, enacting personal changes, sharing resources, large-scale corporate regulation).

In terms of increasing renewable energy production, we are interested in the state investigating and furthering public investment and buildout of clean energy infrastructure. For example, [LD 1700](#) (2025) created a pilot project to expand Efficiency Maine Trust financing options. [LD 838](#) (2026) planned to conduct additional related research, but failed on the Special Study Table.

In a related way, we support continued discussions of the state's support for and rollout of offshore wind procurement and a hub port in preparation for a future federal administration more supportive of this technology. It is important to share that the potential of offshore wind is crucial to the electrification of the state.

In terms of increasing efficiency, we are also interested in streamlining and increasing public awareness of low/moderate income (LMI) energy efficiency and assistance programs, with the recognition that only 30% of eligible households are enrolled in HEAP and there is under-enrollment in many similar LMI programs.

Cooperative ownership of energy infrastructure represents another way to engage low-income communities. For example, [Maine Community Power Cooperative](#) (MCPC) has seen success lowering rates for its owners while increasing solar power in Maine.

Consumer protections in the energy/utility sector is an important part of an Energy Plan that takes all Mainers into account. When populations are already vulnerable, they are more likely to be harmed by many aspects of the energy system, including:

- High energy burdens

Maine Climate Action Now

- Predatory retail energy suppliers and predatory solar advertising
- Polluting infrastructure sited in low-income/racialized neighborhoods
- Landlords' voluntary use of efficiency programs when only tenants are eligible
- Utility shutoffs and debt accrual

E. What are the best ways to connect with and include socially vulnerable counties and communities in the energy planning process?

Maine has already created an effective outreach system to share information and reach socially vulnerable communities (tribal, immigrant, LMI, rural) during the Covid-19 pandemic. This system used daily radio information broadcasts, multilingual translated resources, and local trusted community organizations as information hubs. It should not take a public health crisis to utilize this kind of infrastructure, especially when so many people are being left behind by normal practices when it comes to the state's energy system. These efforts should be used now to connect with socially vulnerable counties and communities in the energy planning process.

Part 2: Maine's Energy Landscape

A. Which market, policy, or economic shifts that have occurred in 2025/2026 do you consider to be the most consequential for energy planning in Maine, and why?

One major development in the past year has been the federal government's interference with clean energy and doubling down on fossil fuel energy. This policy change has resulted in negative short and long-term complications. Halting offshore wind progress in the Gulf of Maine has been particularly harmful, because this technology has the potential to comprise over 50% of the state's clean renewable energy. If implemented effectively, offshore wind can also make electricity more stable, reliable, and affordable for Maine's ratepayers.

Another development has been the data center boom coming to Maine. [LD 307](#) (2026) has provided a public forum for Mainers to debate the appropriate balance of a potential influx of investment and employment for the state with concerns about price increases, environmental impacts, and appropriate regulatory measures.

The ongoing Middle East conflict involving Israel, the U.S., and Iran has resulted in spiking fossil fuel prices. This comes only around four years after the Russia-Ukraine conflict caused global energy shocks, which was described in the 2025 Energy Plan.

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These continued wars highlight what we already know: a transition away from fossil fuels insulates Maine ratepayers from price unpredictability.

To help jumpstart clean energy buildout, we are interested in Maine exploring public financing and ownership of renewable energy infrastructure. ([LD 1700](#), 2025) Public institutions benefit from large purchasing power and can take advantage of low-interest loans, increasing the speed at which renewable energy can proceed.

C. How are these changes influencing financial decisions related to energy at the household and private sector levels?

The lack of forward movement in the offshore wind and other renewable energy sectors continues to allow the volatile and rising cost of fossil fuels to spike utility bills. This directly applies to home heating oil, but even homes which have electrified are seeing rate increases due to ISO-NE's reliance on fossil fuels for a large share of electricity production. As long as this regional dynamic continues, electrification and increasing Maine's statewide renewable energy portfolio will exist in the context of wider fossil fuel dependence.

D. How do these changes specifically affect socially vulnerable communities, and what can Maine do to make sure the Energy Plan is designed to benefit everyone?

High utility and heating bills affect socially vulnerable communities and we can see from enrollment numbers that a large majority of eligible populations do not take advantage of assistance programs. In the near future, MCAN and its members are undertaking the following tasks in an attempt to alleviate these issues:

- a. Potential to streamline program enrollment
- b. Increasing public awareness of existing programs
- c. Energy coaching training to increase community awareness of home energy efficiency upgrades

Part 3: Updating the Objectives of the Maine Energy Plan

A. Are the objectives from the 2025 Energy Plan still relevant? If not, what updates or changes would you suggest?

and

B. What data, underlying assumptions, or analyses from the 2025 Energy Plan should be revised or prioritized in the 2027 plan?

Maine Climate Action Now

Cost of Renewables

The fact that producing renewable energy requires no fuel costs once projects are installed could be emphasized more strongly. This is a clear common sense argument that this type of energy becomes cheaper over a long timeframe.

However, it's important to figure out why "renewable energy is expensive" is incorrectly believed by so many people. The greater context of constantly rising costs is happening at the same time as a renewable energy boom, so it might be connected in people's minds. "It would have been even more expensive without renewables" is trying to prove a hypothetical at a time when real people are suffering under high energy burdens.

Gaining public trust and matching the Energy Plan to Mainers' real-world experiences is also important. With this in mind, it might also help to explicitly name misleading and bothersome door-to-door solar salespeople. If left unchecked, these sales tactics threaten to sour the general public against solar and all forms of renewable energy. "I trust renewable energy but not the motives of people selling it" is a mindset that has been increasing over the past few years that is important to address head on.

Health and Safety

In the 2025 plan, air and water quality are not explicitly mentioned, the term "pollution" does not appear, and health isn't mentioned other than in the context of emergencies. Oil spills and groundwater contamination are real problems resulting from our reliance on fossil fuels, but they are unfortunately seen as a normal part of life. In a similar way, home safety is not mentioned (the frequency of home fires, carbon monoxide, explosions, and more are all worsened by the widespread reliance on fossil fuel energy). Highlighting these factors alongside financial arguments would provide additional important context.

Calling a section "responsibly advance clean energy" might give the impression that this type of technology represents a new, untested risk and the existing system is working fine. But the status quo leads to spiking prices, hundreds of heating oil spills per year, and hundreds of heating oil-related fires per year in the state.

Utilities

Maine Climate Action Now

The 2025 Energy Plan largely centers private utilities as the future planners and owners of energy infrastructure. In this plan, they are seen as neutral actors that are on the same team as Maine's government and ratepayers. It might be more helpful, however, to objectively highlight the ways these investor-owned utilities have worked towards and against Maine's climate and affordability goals.

In a related note, a future plan would do well to highlight regulatory capture and/or mismatched incentives for investor-owned utilities' investments vs. climate investments vs. affordability and how these misaligned incentives can affect price increases and hamper clean energy buildout.

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

Objective B: Ensure Maine's Energy Systems are Reliable and Resilient in the Face of Growing Challenges

The introductory paragraph in the 2025 plan only covers financial risks, but there are many more risks (see above).

Objective C: Responsibly Advance Clean Energy

2. Other considerations in the development of the energy plan with regards to OSW:

- Increased meaningful engagement with each of the four federally recognized tribes in five communities in Maine and the Wabanaki Sustainable Energy Team around OSW hub port siting, data collection and fishery and marine wildlife monitoring
- Development of partnerships for the study of and monitoring of the Gulf of Maine with whichever tribal communities (or all) wish to engage
- Provision of financial resources to facilitate engagement capacity.

5. Renewable Energy Credits (RECs) might not be the most complete way to measure a state's renewable portfolio. We are interested in exploring additional metrics Maine can deploy to ensure local or regional emissions reductions, additional clean generation and/or decarbonization as well. Maine's portfolio shouldn't just be about crunching accounting numbers, it should also have room to highlight the increased health and safety made possible by transitioning away from fossil fuels.

Maine Climate Action Now

6. Per LD 1700, which directs EMT to invest public equity in any clean renewable energy infrastructure up to \$1 million by 2028, we are interested in EMT staff identifying a “small or [portion of a] large-scale energy generation” system in which to invest public funds.

Objective D: Deploy Efficient Technologies to Reduce Energy Costs

3. An opportunity to expand load flexibility resources, particularly through voluntary consumer-enabled mechanisms has been passed into law ([LD 1730](#), 2026) and consumers will be able to buy plug-in solar systems, most likely by the end of 2026. Expanding easy access for all ratepayers (especially LMI consumers) and creating rebates will grant them the potential for hands-on learning about electrical load reduction. We are hoping this new law can help shift electrical use behaviors in a way education alone cannot.

4. EV adoption targets are falling short of their intended impact, especially because of a too-narrow focus on individual car ownership rather than systemic transportation changes. As it turns out, [not all cases of vehicle electrification are equal](#), and the ones that matter most are not electrifying at the rate they need to.

Thank you for the opportunity to provide comments to inform the development of the 2027 Maine Energy Plan.

Amy Eshoo

Director, Maine Climate Action Now

Maine Department of Energy Resources
Burton Cross Building, 3rd Floor
111 Sewall Street
Augusta, Maine 04330



April 1, 2026

Re: Request for Information: 2027 Maine Energy Plan

Dear Maine Department of Energy Resources,

The Maine Coast Fishermen's Association (MCFA) works to support strong, stable fishing businesses and vibrant fishing communities for future generations. Built and guided by Maine fishermen, our organization provides a voice for community-based fishing businesses and advocates for management decisions that sustain both the resource and the people who depend on it.

Our response to the Request for Information on the 2027 Maine Energy Plan will focus on Objective C: Responsibly Advance Clean Energy as it pertains to offshore wind development. To make our stance clear, MCFA does not believe that the ocean is a place for energy development of any kind. While MCFA is a fisheries nonprofit, our foremost focus lies with the Gulf of Maine as an ecosystem and the opportunity it holds for food production. We firmly believe that without thriving fish populations, we cannot sustain our fishermen or fulfill our mission to promote science-based decision making, accountable fishing practices, and responsible management for the benefit of future generations.

That being said, MCFA makes every effort to engage deeply and constructively in the offshore energy development process. MCFA actively participated in the Maine Offshore Wind Road Map Fisheries Working Group and holds a position on the board of the Maine Offshore Wind Research Consortium. Our staff and fishermen partner with the University of Maine, Department of Marine Resources, Biodiversity Research Institute, Gulf of Maine Research Institute, and Colby College on research projects. These collaborative efforts focus on assessing the short and long-term impacts of offshore wind development on Maine's fishing communities. We use this deep background to inform our comments and response to Objective C, Question 2: *What offshore wind data, research information, or other considerations should be considered in the development of the energy plan?*

The Research Base Is Not Ready to Support Accelerated Development

Despite the commendable effort that the Department of Energy Resources (DOER) is putting towards research with the Maine Offshore Wind Research Consortium, we believe that significant research gaps remain, particularly regarding floating offshore wind in the Gulf of Maine. We believe that Maine-specific research should be completed before commercial development advances. Maine citizens deserve to understand what the analysis and assessment of these projects reveal before advancing any new commercial solicitation timelines.

The March 2026 report by the Responsible Offshore Science Alliance (ROSA), [*Fish and Fisheries Offshore Wind Research Gaps Analysis: U.S. Atlantic Coast*](#), provides the most comprehensive peer-reviewed assessment of what is known and not known about the interactions between offshore wind development and fisheries. The report finds that only 21 of 240 research and monitoring projects

are being done in the Gulf of Maine. On top of that, 74% of all existing research focuses on fixed-bottom wind infrastructure. Besides the difference in technology between the Gulf of Maine and Southern New England, where the vast majority of existing research is, fishing conditions, gear types, species assemblages, and fishery structures differ significantly from those within the deep waters of the Gulf of Maine. This means that research from Southern New England cannot be assumed to apply to floating offshore wind infrastructure or Maine's unique ocean and fishing characteristics. MCFA urges DOER to incorporate this report directly into the 2027 Energy Plan's analysis of offshore wind. Here are some of the research gaps that are of direct consequence to Maine fishermen:

Socioculture, Management, and Economics:

- No research on offshore wind impacts to Maine port infrastructure (dock space, working waterfront access, gentrification pressure)
- No process to identify or resolve conflicts among energy goals, fisheries management, and biodiversity protection
- No guidance for councils or commissions when offshore wind disrupts species distributions or increases stock assessment uncertainty
- No interim survey indices to maintain data continuity between pre-construction and operational phases
- No observer protocols tailored to wind farm conditions

Ecology

- No agreed-upon cumulative impact assessment framework across offshore wind projects
- No information on light condition changes within wind farms and impacts on primary production
- No research on decommissioning effects on marine species
- No research on larval transport and recruitment impacts
- No research on changes to spawning timing, location, or habitat use for key Gulf of Maine species
- No research on shifts in trophic interactions and food web dynamics
- No research on electromagnetic field (EMF) effects on crustaceans

Technology

- No research on interactions between floating mooring systems, anchor lines, and bottom habitat
- Almost no research on how floating platforms differ from fixed-bottom systems (sound, EMF, habitat, species distribution) in Gulf of Maine conditions

We believe these findings from ROSA's analysis represent important context for DOER as it considers how best to sequence offshore wind planning alongside the research needed to do it responsibly.

Fisheries Must be Meaningfully Engaged

Maine's fishing communities must be meaningfully engaged at every stage of offshore wind planning, siting, research, and development. Engagement cannot be treated as a procedural requirement or a one-time consultation. It must be continuous, well-resourced, and demonstrably influential in shaping outcomes. To date, the State has done an exceptional job at engaging the fishing industry with the Maine Offshore Wind Roadmap, the Research Consortium, and the site visit to Scotland. We want to emphasize that engagement must go beyond site selection.

At a minimum, meaningful engagement must include:

- Fishermen must be engaged before key decisions are made, including in research design, leasing decisions, siting, and community benefit agreements, and remain engaged throughout the full lifecycle of any project.
- Given the significant data gaps that remain, fishermen's firsthand knowledge of species behavior, fishing patterns, and ecosystem dynamics must directly inform research questions,

monitoring design, and interpretation of results. Collaboration with the fishing industry to conduct these research projects is also recommended.

- Fishermen must have a formal, supported role in decision-making processes. This includes ensuring that participation is accessible and that the burden of engagement does not fall disproportionately on individual fishermen or small businesses.
- The State and developers must clearly demonstrate how fishermen's input is incorporated into decisions, including where it is not, and why. Engagement must be measured by outcomes, not the number of meetings held.
- Engagement should reflect how fishermen operate through direct, timely communication, dockside conversations, and trusted representatives, not solely through written or online processes.

Maine fishermen have consistently raised legitimate and unresolved concerns regarding offshore wind development and its potential impacts on fishing access, safety, the marine ecosystem, and the long-term viability of the seafood economy. At present, there remains significant uncertainty about whether and how offshore wind development can coexist with Maine's fisheries. Meaningful engagement is not only a matter of process, but a prerequisite for developing sound policy, credible science, and durable outcomes.

Community Benefit Agreements Must Be Arranged with Fishermen

A specific element of engagement that we want to emphasize that needs deliberate attention is fishermen's involvement in Community Benefit Agreements (CBAs). For CBAs to be effective and equitable in the Gulf of Maine, they must explicitly recognize commercial fishermen as core stakeholders and ensure they have a formal, decision-making role in both the development and implementation of these agreements.

LD 1895 established that offshore wind projects must deliver community benefits through stakeholder engagement processes and investments in fishing communities, including through required fishing communities investment plans and advisory bodies that include fishing industry representatives. However, to meet the intent of the law, fishermen must be explicitly named and directly engaged in the design, negotiation, and implementation of any community benefit associated with offshore wind development. We urge the State to require that fishermen are formally included as decision-making participants in community benefit agreement processes with both the state and as a requirement for any agreement the developer would be making on their own terms. This includes a clear role in determining investment priorities and overseeing implementation to ensure that benefits are responsive to real impacts on fishing businesses, working waterfronts, and coastal economies. Without this explicit requirement, there is a significant risk that community benefit agreements will fail to reflect the needs of fishing communities or adequately mitigate the impacts they are intended to address.

We also recognize that the fishing industry does not have the required legal/negotiation expertise to have an equitable stake in these conversations. MCFA believes that the state should equip the fishing industry with adequate legal support to negotiate with developers to reach a just agreement.

Hold the Line on Existing Protections

It is understood that with the Interior Department's actions implementing the Executive Order to Temporarily Withdraw Offshore Wind Leasing, it also rescinded the Wind Energy Areas that BOEM determined in 2024. While not perfect, the Gulf of Maine Wind Energy Area was informed by fishing industry engagement and did not include Lobster Management Area 1, Cashes Ledge, Wilkinsons Basin, and other key fishing grounds. If commercial offshore wind planning and siting are to occur again, we

need to reaffirm siting restrictions away from active fishing grounds, doubling down on the effort that took place in siting for the Gulf of Maine between 2022 and 2024.

We greatly appreciate your dedication and commitment to the well-being of Maine's coastal communities and its invaluable natural resources. Should you require any further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Ben Martens". The signature is fluid and cursive, with the first name "Ben" and last name "Martens" clearly distinguishable.

Ben Martens
Maine Coast Fishermen's Association

TOGETHER,
WE PERSEVERE.

mainecoastfishermen.org



2027 MAINE ENERGY PLAN

Deadline for Responses: April 27, 2026

Submit responses to: doer@maine.gov subject line “Energy Plan RFI”

OR: [Online Survey](#) (Microsoft Forms)

Please choose the most relevant questions to you; responding to all questions is not required. To the extent feasible, please reference question numbers when responding. Submissions may be included directly in the body of an email and/or as attachments in common file formats (.docx, .pdf, or .xlsx). Please note: All content submitted to the Department of Energy Resources in response to this RFI is subject to the Maine Freedom of Access Act, and may be disclosed publicly.

Questions of Interest

Part 1: Engaging in Maine’s Energy Plan

A key part of this effort is seeking public input into the planning process and reflecting that input in the final Energy Plan. DOER plans to host a series of public meetings, stakeholder interviews, and public comment opportunities with the goal of engaging Maine people and interested parties in the development of the Plan. DOER welcomes input on how to most effectively engage stakeholders across Maine in this work.

- A. What recommendations do you have regarding the best ways to engage and solicit feedback from the public throughout the energy planning process in calendar year 2026?
 - The 2026 planning process is an opportunity to design a system for expanded and sustained public engagement over multiple planning cycles, to include community-based organizations that regularly support socially vulnerable residents. This engagement plan should be coordinated with a Maine Climate Council engagement plan.
 - Continue to engage with communities and individuals that were consulted for the 2025 Energy Plan to continue building trusting relationships, center local priorities and contexts, and gain feedback that is relevant to past and future planning.
 - Before engaging with new communities, learn about their contexts, histories, and priorities. Consult with a trusted community-based partner and/or leader, such as a municipal staff member, faith leader, or community champion.
 - Facilitate both in-person and virtual engagement opportunities to ensure increased participation
 - When asking for feedback from the public, ask tailored and concise questions in an open-ended format. For example, the questions in this RFI are too broad for facilitating

public feedback at our community group/public meetings. Requests for feedback need to be more specific and provide more options to guide responses.

- When community feedback is received, integrate it into the plan or provide a clear explanation as to why it was excluded, making plans to address those concerns in the future

B. Are there any regional or geographic considerations DOER should consider when planning outreach and engagement?

- Make extra in-person efforts in Northern communities, specifically Aroostook County, Washington County, Piscataquis County; you may need to provide food or some other incentive to get people to participate
- Even though gathering feedback from Northern Maine communities can be more challenging than communicating with Southern Maine communities due to restricted capacities, an iterative effort should be made to include Northern voices. Northern communities face some of the highest energy burdens, oldest infrastructure, and the highest Social Vulnerability. The plan should prioritize Northern Maine engagement.
- Wabanaki Tribes should be engaged in a separate government to government process separate from municipalities to respect Tribal sovereignty
 - This engagement should occur at the Chief and/or Tribal Council level and should also engage tribal sustainable energy coordinators and citizen committees (e.g., the Wabanaki Sustainable Energy Coordinator, the new individual coordinators at each Tribe, the Sipayik Resilience Committee, the Wabanaki Sustainable Energy Team), as well as heads of environmental, housing, and economic development departments.
 - However, engagement with coordinators and citizen committees are not substitutes for direct government-to-government engagement with Chiefs and Councils.

C. Are you or your organization interested in participating in stakeholder meetings (virtual or in-person), small group discussions, or having DOER present to your organization or community about the planning process? If so, what format works best for you?

- The MAINECAN Support and Research Team could ask each MAINECAN working group if they want to host DOER for a discussion session, similar to the engagement that DOER and GOPIF conducted with the Local Leads the Way energy coaching working group.

- We could also ask the Wabanaki and Community Sustainable Energy Teams if they would be willing to have someone from DOER come to one of their regular monthly virtual meetings.
 - Four Directions facilitates regular meetings of the Tribal Housing Coordinators. They may be a good group to contact to reach that group.
- D. Are there specific topics that you would most like to see covered in public meetings or workshops?
- Through the Energy Plan, how can State programs and policies better support community-led renewable energy, battery storage, microgrids, and other grid resilience strategies? Many communities want to facilitate local renewable energy development to offer lower, more stable costs and more reliable energy supply for residents and businesses. But local volunteers and groups do not have the capacity to navigate project development without costly consultants.
 - Also how can these programs better support Tribal energy sovereignty.
 - There is a big need for more energy auditors in the state - trainings that are accessible to people in rural communities and Tribes and some coordinated effort/support to get home energy audits in these communities at very low or no cost.
- E. What are the best ways to connect with and include socially vulnerable counties and communities in the energy planning process? “Socially vulnerable counties and communities” are defined in law as “those counties and communities in the State containing populations that are disproportionately burdened by existing social inequities or lack the capacity to withstand new or worsening burdens.”
- We answered this in questions A and B
 - It’s important in discussions with communities not to refer to them as socially vulnerable, undeserving, or other terms that define them based on perceived deficits. Although terms like SVI can be useful for policy and planning purposes, make sure to engage with communities as they self-identify (i.e., rural, etc) or in terms of their assets (i.e., energy independent, etc.)
 - Work with the communities to identify what they see as their assets and vulnerabilities in addition to what the State has already identified through SVI.
 - Begin the engagement early to allow for those with limited capacity ample time to respond.
 - Make engagement worth their while. At a minimum, provide food. But, bigger picture, people are more likely to engage if they can see a path toward the engagement helping their situation. Maybe by engaging, they can get free home energy audits or something else that will benefit their homes or community energy-wise. A direct benefit that is easy to see and understand is very important.

- a. The Maine Social Vulnerability Index (MSVI) is based on 19 socioeconomic and demographic indicators taken from US Census data. The MSVI is a customized version of the US Centers for Disease Control's social vulnerability index. Please comment on whether and to what extent DOER should utilize the MSVI to inform engagement with socially vulnerable counties and communities.
- Although the municipal-level SVI has been instrumental for understanding the broader distribution of social vulnerabilities, a more refined and localized approach to identifying and engaging vulnerable households is now needed. State and local programs now need to identify socially vulnerable groups within and across high/medium-SVI municipalities, because significant populations in these towns are still vulnerable and underserved.
- Measures should also incorporate localized costs. For instance, island communities experience significantly higher costs for fuel, food access, and other services—on the order of 20% higher costs than the mainland—but these costs are not reflected in the SVI nor necessarily in household incomes.
- The identification of vulnerable communities should also take into account municipal capacity rather than household social vulnerabilities alone
- The DOER should pay close attention to the statements in the SVI about Wabanaki Tribes and unorganized territories. Those statements currently include information about how the CRP incorporates these groups. The DOER should work with these groups to develop a specialized approach for how they will address these groups in the DOER work as well.

Part 2: Maine's Energy Landscape

Since the 2025 Energy Plan was released, Maine's energy landscape has continued to evolve, shaped by market shifts and broader economic conditions, such as changes to state and federal policies, fuel prices, technology adoption, and investment trends. We recognize these changes, and others, have had varying impacts and DOER welcomes input on how these changes should be reflected in the next Energy Plan.

- A. Which market, policy, or economic shifts that have occurred in 2025/2026 do you consider to be the most consequential for energy planning in Maine, and why?
- In conjunction with inflation and unmanageable construction costs in particular, loss of federal incentives, grant programs, and permitting has severely curtailed municipalities' plans for installing renewables, building electrification, backup power systems, etc.
- Federal disinvestment also derailed community initiatives that would have expanded access to solar, energy efficiency, and heat pumps for residents.
- The illegal termination of awarded grants, often already a year or more underway, has severely eroded trust in federal funding, leaving many communities and Tribes

wondering if it is even worth all of the time and effort to apply for federal funding, which was already a complex system to navigate and manage.

- The shifts in electricity and oil prices may help people see the importance of energy savings measures but high electricity prices further complicate people's feelings about shifting to heat pumps and electric vehicles.
 - Increasing AI has people more worried about cyberattacks on critical infrastructure.
- B. As it relates to Maine, what are the most important near-term impacts of these changes (over the next 1-3 years) that should be addressed through this Energy Plan or planning process?
- Instability of the policy environment impacts community-level programs' viability and workforce development.
- C. How are these changes influencing financial decisions related to energy at the household and private sector levels?
- Aside from reports of households abandoning plans for improving home energy systems due to loss of incentives and economic uncertainty, residents seeking to lower energy costs have been turning to solar leases, both to defray upfront costs (especially for older adults) and to take advantage of commercial tax credits. These leases may be exposing vulnerable residents to additional risks.
 - High electricity prices and reducing incentives make people wary of heat pumps and electric vehicles, technologies many already may not understand well
- D. How do these changes specifically affect socially vulnerable communities, and what can Maine do to make sure the Energy Plan is designed to benefit everyone?
- We already answered this in the above questions, but additional thoughts are:
 - Engage with individuals in communities across economic, social, and political sectors.
 - Energy and environmental changes have varying impacts across community context, and thus have multiple solutions that need to be addressed in the Energy Plan. Rather than only including recommendations and solutions that are unanimously agreed upon, include solutions within specific contexts. For example, heat pumps may be a great solution in Northern communities that have their own electric utility and have lower electric costs, but it may be inappropriate to propose electric options in communities with high energy burdens, or those communities may require additional considerations.
 - Similarly, hydropower may be a viable option in some communities, but it is frequently inappropriate for Tribal contexts. Multiple truths and ways of knowing can and should co-exist within the plan.
 - We all recognize that, even with federal incentives, home energy upgrades were still out of reach for people with low- and moderate-income. Municipal and Tribal governments, citizen committees, and other community groups want to facilitate solutions but need sustained State support to do so. In particular, they need support on:

- How to create and implement sustainable local plans that build capacity in ways that can weather the shocks described in question A of Part 2.
- How multiple communities and Tribes can collaborate to strengthen each others' individual local sustainable capacity-building plans
- How sustainable local energy plans and the state plan can work together and not be at odds with each other

Part 3: Updating the Objectives of the Maine Energy Plan

The 2025 Energy Plan laid out objectives, strategies and actions identified in the prior planning process to responsibly advance Maine's energy system and meet the state's climate and clean energy requirements (see "The 2025 Maine Energy Plan" above).

- Are the objectives from the 2025 Energy Plan still relevant? If not, what updates or changes would you suggest?
- What data, underlying assumptions, or analyses from the 2025 Energy Plan should be revised or prioritized in the 2027 plan?

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

Below are the five objectives included in the 2025 Maine Energy Plan with relevant questions under each.

Objective A: Deliver Affordable Energy for Maine People and Businesses Energy costs affect both daily life and the broader economy in Maine.

- They show up directly in household utility bills; delivered fuels like heating oil, kerosene and propane; transportation fuels; and indirectly in the prices of goods and services that rely on energy for production or delivery. Energy costs also influence the competitiveness of Maine's businesses and industries. In the 2025 Energy Plan, the residential sector was examined using an "energy wallet" analysis, which broke down typical household energy costs and projected future scenarios. Affordability can also be assessed through measures like energy burden—the share of household income spent on energy—or by conducting alternative analyses that explore the specific impacts of varying cost trajectories on Maine's economy.

Objective A includes the following strategies:

- Reduce Maine's dependence on imported fossil fuels for heating and electricity generation
- Reduce energy burden for low- and moderate-income households

- Review existing approaches to identify additional electricity cost control opportunities

Objective A Questions

1. How should the energy plan define energy affordability?
 - Energy affordability should account for the multiple dimensions of energy insecurity, including energy use curtailment and economic losses due to power outages, which current energy burden metrics do not.
2. How should the energy plan prioritize energy affordability while also ensuring modern and reliable energy infrastructure and meeting other goals?
3. What strategies would help ensure energy affordability for households and communities with the highest energy burdens?
4. What metrics should Maine use to track progress toward delivering affordable energy?
 - See Knasin et al., 2026, *Measuring What Matters: Rethinking Energy Insecurity Metrics*. <https://kleinmanenergy.upenn.edu/research/publications/measuring-what-matters-rethinking-energy-insecurity-metrics/>
5. Are there other approaches that Maine should consider to reduce energy costs and price volatility?
 - Enable more community-owned, nonprofit, distributed energy resources. For instance, quasi-municipal corporations that develop community solar for LMI subscribers.
6. Comment on available information, data, or provide feedback on energy supply resources or potential resources in Maine (potential resources include, but are not limited to, onshore wind, solar, biomass, biofuels, delivered fuels, waste-to-energy, energy storage, offshore wind, nuclear, natural gas, hydropower, geothermal, tidal energy, and other innovative technologies). Topics of interest include, but are not limited to:
 - a. Current/existing resources and operations
 - b. Feasibility and opportunities for development of new or expansion of existing resources
 - c. Land-use and siting considerations
 - d. Technologies and other relevant characteristics that may influence deployment

7. Please comment on expected trends for energy demand in Maine.

Objective B: Ensure Maine's Energy Systems are Reliable and Resilient in the Face of Growing Challenges

- Maine's aging electric grid infrastructure continues to face significant pressure from severe storms. As a heavily forested, rural state, Maine's electric transmission and distribution lines have a higher probability of damage from falling trees during wind or ice storms and as a result, Maine experiences more frequent and longer duration power outages than most US states. In 2024, Maine ranked third in the country for the number of total outages as well as the average time customers were without power. In 2023 and 2024, Maine experienced major winter storms that devastated communities across the state, including inflicting significant damage to the electric grid and imposing significant new recovery costs for customers. Maine's reliance on imported fossil fuels for heating and transportation also exposes consumers in the state to risks inherent to the supply chain for these energy sources.

Objective B includes the following strategies:

- Establish ambitious, data-driven targets for energy resilience
- Increase coordination and information sharing across energy-related emergency management and resilience entities
- Deploy targeted resources to advance innovative and modern resilience solutions including microgrids
- Leverage innovative technologies including energy storage to increase resilience and reduce greenhouse gas emissions
- Strengthen planning and engagement by utilities to identify and address climate and resilience threats cost-effectively
- Advance partnerships and coordination to enhance Maine's energy security and maximize relevant federal and other funding opportunities

Objective B Questions

1. Please comment on how grid resilience, reliability, and security should be considered in Maine energy planning and how the state should be tracking/considering reliability and resilience in this Plan?
2. Are there new technologies or innovative solutions to advance reliability and resilience?
 - We need a program that incentivizes grid-edge battery systems. Efficiency Maine's current battery storage program insufficiently incentivizes home battery systems. It is too

complicated and does not defray the upfront cost, likely leading to inequitable adoption in the residential sector. We have observed numerous cases of customers considering the EMT program, only after affording to install the battery system independent of incentives. None have suggested that the incentives were the deciding factor for customers' ability to pay.

3. Please comment on delivered fuel resilience, reliability and security.
4. Please comment on whether any statutory, regulatory, or policy changes are needed to support access to information about critical energy reliability and resilience topics across and or all energy sectors in Maine.
 - For energy planning and tracking, municipalities and associated entities need utilities to provide better and more frequent access to localized data on energy demand, energy consumption, DER installations, and outages (causes, location, duration).
 - The State should sponsor a microgrid pilot program, including implementation funding, and a community microgrid rulemaking process as Oregon is conducting. Many towns want to move forward with community-scale microgrids but face regulatory and financing challenges that are inefficient to independently resolve. Regulatory clarity and a set of legal/program tools to support communities in structuring ownership and financing of microgrid assets in cooperation with utilities, including battery storage, and navigating PUC and utility agreements would allow us to move forward at lower cost and with better outcomes.
5. What emerging risks or resilience challenges should the state consider when planning for energy security, and what general approaches, resources, tools, or technologies may help address challenges and improve information sharing and coordination?

Objective C: Responsibly Advance Clean Energy

- Maine has a long history of producing energy from clean resources including hydropower, biomass, and wind, and is working to advance those and other clean energy sources to most affordably meet energy needs as well as climate goals and economic development targets. In recent years, hundreds of millions in capital expenditures from the clean energy sector have been invested across the state in the form of new projects and efficiency upgrades, generating significant economic activity in the state and creating new job opportunities. As Maine continues to electrify the heating and transportation sectors and demand for energy grows, it is critical that the state's

electricity is increasingly generated by affordable, reliable, homegrown clean energy resources.

Objective C includes the following strategies:

- Establish a new Clean Energy Standard (CES) to ensure all Maine people have access to cost-effective, reliable, 100 percent clean energy by 2040
- Establish a regular schedule of competitive energy purchases
- Advance responsible development of offshore wind energy
- Advance efficient, necessary infrastructure to modernize Maine's energy systems
- Coordinate and collaborate regionally to maximize benefits and achieve shared goals

Objective C Questions

1. Under law, DOER is required to identify approximate total project award targets for the next 3 competitive solicitations to be conducted by the department pursuant to 35-A M.R.S.A. §10313. Please comment on this requirement including priorities and considerations for the next three competitive solicitations and implementation of §10313.
2. Under law and through the Maine Offshore Wind Initiative, offshore wind remains an important part of the state and regional long-term energy future. What offshore wind data, research, information, or other considerations should be considered in the development of the energy plan?
3. Please comment on the feasibility and/or costs of developing advanced nuclear technologies in Maine.
4. Relevant to the energy plan and pursuant to Resolves 2025, ch. 39, DOER is conducting a study, in consultation with other state agencies, evaluating the role of hydroelectric power generation, pumped hydro storage, and geothermal systems in meeting Maine's energy and climate goals. Please comment on:
 - a. Emerging technologies that could safely and effectively improve or expand existing hydroelectric power generation capacity in the state;
 - b. Characteristics of locations in the state that might be suitable for pumped storage hydropower system development;

- c. Considerations for developing district geothermal systems on brownfield sites in the state.
 - d. Any other initial comments related to the Legislatively directed hydropower and geothermal studies.
- 5. DOER is required to complete a 2027 Renewable Portfolio Standard (RPS) Assessment, which is now under development. Are there any specific priorities or considerations that are relevant to the Energy Plan development as it relates to Maine's existing RPS study or resources eligible under Maine's existing RPS and complementary Clean Energy Standard (CES)?
- 6. Please comment on how to address financial barriers to clean energy deployment. What financial tools would aid in greater deployment of small or large-scale energy generation resources?
 - Community groups are more able to identify and work with residents most in need of affordable clean energy than large-scale developers are. Support community groups to develop local renewable sources as nonprofits, e.g. through green banks or other low-barrier financing mechanisms.
- 7. Please comment on transmission and distribution capacity and infrastructure needs to facilitate deployment of new energy resources.

Objective D: Deploy Efficient Technologies to Reduce Energy Costs

- Energy efficiency – using less energy to achieve the same result – helps lower energy costs across Maine's economy. Energy efficiency can be realized through a range of technologies and other practices. Increasing electrification substantially increases efficiency – in fact, by 2050 widespread electrification could enable Maine to reduce the overall amount of energy needed while growing its economy. Expanding electrification with modern technologies also increases the availability of load flexibility resources. Because the electricity grid is built to accommodate the times of greatest demand, there is potential for significant cost savings for all electricity customers when peaks can be moderated and lower-cost, abundant energy sources can be maximized.

Objective D includes the following strategies:

- Advance beneficial electrification and weatherization to reduce energy costs and increase overall grid efficiency
- Leverage electrified technologies to unlock grid benefits for consumers

- Expand Maine's electric vehicle (EV) charging network

Objective D Questions

1. Please comment on any opportunities for increased energy efficiency in any sector in Maine, including opportunities to advance specific technologies (ie: weatherization, wood heat, combined heat and power, heat pumps, etc.) or associated policies.
 - The two main barriers are workforce shortages (and the related lack of competitive bidding) and a lack of gap funding to make upfront costs affordable for LMI residents.
 - Home energy coaches and navigators are an important component for expanding local understanding of home energy options and could be pivotal in reaching people with low and moderate income; this localized effort requires financial support to expand to rural communities and communities with higher populations of people with low and moderate income and to access peer learning synergies and benefits.
2. Comment on opportunities to increase the efficient utilization of the electric grid.
 - In addition to developing a sufficient energy efficiency workforce, so that we can help residents to weatherize and electrify homes, incentivize grid-edge and community-scale battery systems.
3. Comment on opportunities to expand load flexibility resources, particularly through voluntary consumer-enabled mechanisms.
 - Again, incentivize grid-edge and community-scale battery systems.
4. Comment on opportunities to cost-effectively expand Maine's EV charging network as well as other clean or more efficient transportation technologies.

Objective E: Expand Clean Energy Career Opportunities for Maine People and Advance Innovation

- In 2024, there were approximately 27,500 workers in Maine's energy industry, including approximately 16,200 clean energy workers and 11,400 traditional energy workers. Today, Maine's clean energy sector alone contributes \$3 billion to the state's economy annually. As Maine's energy sectors continue to grow and change, investing in job training and innovation will be critical to sustaining this momentum. Expanding workforce development helps ensure that Maine people can access good-paying jobs while meeting rising demand in the industry. At the same time, supporting innovation and

entrepreneurship can further strengthen economic growth, encourage locally driven solutions, and leverage Maine's natural and economic resources. Together, these efforts position the state to capture long-term economic, environmental, and community benefits from the clean energy transition.

Objective E includes the following strategies:

- Raise awareness of clean energy careers and connect employers to the local workforce
- Advance clean energy curricula development, technical training, and experiential learning
- Coordinate with educational institutions, technical and vocational training centers, labor unions, and employers to expand and promote clean energy career pathways
- Expand pilot programs, technical assistance, and funding for clean energy innovation and foster partnerships with research, education, and innovation institutions and the private sector to advance clean energy innovation

Objective E Questions

1. Please comment on workforce trends, needs, and priorities for Maine's energy workforce, including new opportunities for Maine to lead.
 - As noted above, one main barrier to moving forward with all energy projects at both the community and household level is workforce shortages, especially for weatherization but also for solar, heat pumps, and heat pump water heaters (including a severe shortage of plumbers). Wealthy residents and second homes are also consuming the limited workforce resources and increasing costs for all residents.
2. Please comment on how the energy plan should consider job quality or other considerations as it relates to growing Maine's economy and supporting family-sustaining careers.
3. Please comment on the role of energy in advancing economic development goals for the state and communities.
4. Please comment on programs, tools, or resources that would support investment in the clean energy economy in Maine.

5. Please comment on programs, tools, or resources that would support workers in the traditional energy sectors, including fuel delivery.
 6. Please comment on climate and clean energy innovation and the needs of the state.
 7. Please comment on programs, tools, or resources that would support research, development, and demonstration of innovative energy technologies and projects.
 8. Please comment on necessary trainings, education, or other information that should be considered for future Clean Energy Partnership programming.
- Workforce training pilots have been valuable but need to be scaled up and accessible to more communities.

Part 5: Additional Considerations

1. Are there any other considerations related to the statutory requirements of the Maine Energy Plan that should be taken into account as the 2027 plan is developed?
2. Please provide additional insights, perspectives, or examples you wish to share.

Use of Information: Information collected from this RFI will be used by DOER to inform the 2027 Maine Energy Plan. This is an RFI only; DOER will not pay for information provided under this RFI and no project will be supported as a result of this RFI. This RFI is not soliciting applications for financial assistance or financial incentives. DOER will publish responses to this RFI on its website. All responses may be subject to disclosure under the State of Maine Freedom of Access Act, thus sensitive or confidential business information should not be provided.

From: [Kay Kerina](#)
To: [DOER](#)
Subject: Energy Plan RFI
Date: Monday, April 27, 2026 10:36:12 PM

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.

Good evening, Department of Energy Resources,

In Response to the RFI for the 2027 Maine Energy Plan, MCA sends the following response to Objective B: Ensure Maine's Energy Systems are Reliable and Resilient in the Face of Growing Challenges Question 5.

A secure energy and internet connectivity system is foundational to Maine's economy, safety, and quality of life. Maine relies on an interconnected network of physical infrastructure, power, transportation, and communications systems that must be resilient, well-maintained, and protected against growing risks from climate impacts, cyber threats, and single points of failure. Robust telecommunications infrastructure is a critical component of this system. As the state agency expanding connectivity and digital opportunity, the Maine Connectivity Authority (MCA) is well positioned to partner with DOER and advise on the relationship between energy and telecommunications infrastructure.

Background & Context

Middle mile, last mile, wireless, satellite, and cellular connectivity all play substantial roles in creating a more resilient Maine, especially as artificial intelligence and the "internet of things" become more integrated into all facets of infrastructure. Strong telecommunications infrastructure ensures rapid and effective communication during disasters, improving coordination among responders and the public. Enhanced infrastructure with a digital equity orientation will ensure all Maine people can participate in and benefit from resiliency efforts including alerts and the collection of real-time data input from remote or low-infrastructure areas, especially when a disaster has impacted communication systems or limited access to parts of the state.

Improved connectivity creates a more complete picture of the state's resilience needs and capacities, and helps deliver on solutions to address both challenges and opportunities. Smart grid technologies and microgrids, are dependent upon reliable, redundant, and robust telecommunications for the monitoring and management of energy distribution, load

management, and outage mitigation. helping to reduce outages. During disaster events and outages, digital platforms enhance communication strategies to provide real-time information to affected populations about resources, emergency services, and recovery plans, helping to mitigate the impact on vulnerable communities.

MCA's digital equity work is critical to the state's resilience work as well, as it ensures that all community members can access resources and information for maintaining and protecting vital infrastructure, resiliency, preparedness, alerts, and recovery efforts. Digital equity work improves reach for resiliency engagement, and increases the likelihood that outcomes are equitable, broadly supported, and meet local needs, especially for our most vulnerable populations. Connected communities who have familiarity and comfort using data will endure an extreme weather event with less damage and a faster recovery.

MCA's Work related to Energy Security

One of the most related spaces that MCA and DOER work is utility poles, still the most common point for both energy and telecommunications infrastructure. Because of the rocky terrain in Maine, wired networks are almost always less expensive and quicker to install aurally on existing utility poles, rather than underground. MCA-funded projects require access to tens of thousands of utility poles across the State. In partnership with the Governor's Office of Policy Innovation and the Future, the Maine Department of Transportation, the Office of Information Technology, the Public Utilities Commission, MCA leads the Interagency Broadband Working Group, a codified subcommittee of the Governor's Infrastructure Implementation Committee. This Group was a critical contributor to the Utility Pole Attachment Study for Broadband, and final report submitted to the Maine Legislature. Pursuant to Resolves 2023, ch. 81, Resolve, to Study the Effect of Current Laws and Rules on the Expansion of Broadband, MCA was charged with creating and facilitating the Utility Pole Data & Performance Working Group (UPDPWG) and conducting a report to investigate the current pole attachment process and explore ways to improve it to support broadband deployment. [The final report can be found here](#). The UPDPWG is composed of utility pole owners and attachers, and continues to meet quarterly to facilitate information sharing and identify shared priorities for policy and practice. This group could be a critical contributor to DOER's planning and strategies.

Similarly, wireless networks cannot remain secure without a hardened power grid and clear emergency communications. By strengthening physical infrastructure and preparing communities, Maine can ensure that advanced communications systems remain functional during emergencies and amid increasing climate challenges, supporting the state's

statutory goal of secure, affordable, reliable, and forward-looking connectivity for all. The ongoing expansion of MOOSE Net will deploy open-access fiber “highways” that create a resilient, redundant backbone network. This infrastructure eliminates single points of failure, supports competitive pricing for community anchor institutions such as schools, libraries, and hospitals, and provides the secure capacity Maine businesses need to grow and innovate. MCA can be beneficial in updating the 2012 Maine Energy Security Plan. Telecommunications infrastructure, and the adoption and use of the internet, has changed drastically since 2012.

Lastly, secure connectivity requires more than infrastructure alone. Workforce development, digital literacy, cybersecurity preparedness, and emerging artificial intelligence safeguards are essential to ensure these networks remain reliable, trusted, and sustainable. MCA advances these priorities through the Digital Opportunity Fund, to raise private and philanthropic support to provide Maine’s most vulnerable residents with devices, digital skills, and online safety training. Investments in people ensure that infrastructure investments deliver lasting value. By investing simultaneously in infrastructure and people, this alignment is building a secure and integrated connectivity ecosystem for Maine that can serve the current needs of our communities and those to come.

MCA welcomes the opportunity to provide greater data or information related to our work in service of the Maine Energy Plan.

Best,
-Kay

Kay Kerina ([she/they](#))
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April 27, 2026

On behalf of the undersigned groups, thank you for the opportunity to provide comments to inform the development of the 2027 Maine Energy Plan.

As the Department of Energy Resources considers the 2027 Maine Energy Plan, offshore wind must remain a priority in state energy planning. Energy bills are rising as Mainers face increased energy demand and a volatile global fuel market, all while climate change threatens our way of life in a coastal state. We need local, reliable energy solutions that lower costs, reduce emissions, and create good jobs for Maine people.

Building an offshore wind industry in Maine would be a game-changer for working families and strengthen communities throughout our state. For Searsport, the investment and job creation that comes from building the proposed offshore wind port would breathe new life into a town left behind by deindustrialization. [A study](#) found that if an offshore wind port is constructed and used to build the 3 gigawatts (GW) of floating offshore wind called for in state law, we could create over 2,000 manufacturing, operations, and maintenance jobs in the first year alone.¹ In total, achieving that 3GW goal would generate over 6,000 construction jobs and 17,000 operations jobs over a ten-year operational period.

The Gulf of Maine has the capacity to produce the energy needed to meet rising energy demand. The University of Maine has developed floating offshore wind technology that is compatible with our Gulf waters and, with a port built in Searsport, can be manufactured and deployed right here in Maine. This additional resource, not subject to high and variable fuel costs, could protect ratepayers from higher energy costs, especially during winter cold snaps when our grid is most expensive, most polluting, and most vulnerable and at risk of blackouts.

A [recent study](#) found that offshore wind could help protect New England's grid during extreme winter conditions, calculating that if Massachusetts had 3.5 gigawatts of offshore wind in operation last winter, energy prices could have been lowered by 11% – saving ratepayers millions of dollars.² This protection against cost increases and blackouts is what Mainers need and what offshore wind can deliver.

Neighboring states like Massachusetts, Rhode Island, and Connecticut have proven how offshore wind can make an impact for working people with the recent completion of Vineyard Wind and the first power being delivered from Revolution Wind. These projects have been a source for thousands of good union jobs, and are now powering hundreds of thousands of homes across New England. Both projects are coming online at a time when working families are struggling with expensive and rising energy bills, made worse by recent global fuel price

¹ Searsport Offshore Wind Port Economic Impact Analysis. Prepared by: Karp Strategies for The Natural Resources Council of Maine and environmental and labor partners. January 2025

² Value of Wind in Winter 2024/25. Prepared by: Daymark Energy Advisors for Renew Northeast. September 2025.

volatility. In New York, South Fork Wind generated electricity on 99% of days and 90% of all hours across 2025, with a capacity factor on par with the most efficient gas plants.³

We must bring new sources of energy to our state – and do so while protecting Mainers and creating family-sustaining union jobs in the process. We have an abundant power source with the Gulf of Maine, we have the cutting-edge floating offshore wind technology developed by the University of Maine, and we have the well-trained workforce to build and maintain it. Offshore wind is a big part of the answer and it's right in our backyard.

COMMENTS

Part 1: Engaging in Maine's Energy Plan

A. What recommendations do you have regarding the best ways to engage and solicit feedback from the public throughout the energy planning process in calendar year 2026?

B. Are there any regional or geographic considerations DOER should consider when planning outreach and engagement?

We recommend that DOER engage meaningfully with each of the four federally recognized tribes in five communities in Maine, as well as the Wabanaki Sustainable Energy Team (through the Mitchell Center at UMaine Orono), for the energy planning process in 2026. “Meaningful” engagement means engagement on multiple occasions, located in the tribal communities, at varied times of day, and with compensation for tribal citizen leaders if desired.

Learning from the traditional ecological knowledge these sovereign nations hold is important to create a holistic Energy Plan. Including these communities is also important because they see some of the highest energy burdens in the state, are potentially located near future energy infrastructure buildout, and often have the least resources or recourse to harms caused by the externalities created by energy infrastructure.

Part 2: Maine's Energy Landscape

A. Which market, policy, or economic shifts that have occurred in 2025/2026 do you consider to be the most consequential for energy planning in Maine, and why?

Related to offshore wind, since 2025, there is an increasing amount of data on the real-world operational characteristics of offshore wind in the Northeast. Data from South Fork project in

³ SPOTLIGHT ON ENERGY: South Fork Wind, the Promise of What Could Be, Regional Plan Association News, by Kyle Mason, Robert Freudenberg, Will Cao & Ravena Pernanand, April 22, 2026

New York and Vineyard Wind in Massachusetts corroborate that offshore wind complements solar power in a diverse and clean energy supply⁴, as well as providing reliable power during winter cold snaps.⁵

Further, despite the hostility of the Trump Administration to offshore wind, more than 9GW of offshore wind was installed around the world in 2025, suggesting that the industry will continue to mature and develop.⁶ This is especially likely in the wake of the disruption in global energy markets due to the war in Iran. Nearby in Nova Scotia, the provincial government has initiated a process to procure as much as 5 GW of offshore wind power.⁷ All of these developments should bolster Maine's long-term commitment to offshore wind as a major component of our future clean energy supply and economic development.

C. How are these changes influencing financial decisions related to energy at the household and private sector levels?

The lack of forward movement in the offshore wind and other renewable energy sectors continues to allow the volatile and rising cost of fossil fuels to spike utility bills. This directly applies to home heating oil, but even homes that have been electrified are seeing rate increases due to ISO-NE's reliance on fossil fuels for a large share of electricity production.

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

Objective C: Responsibly Advance Clean Energy

2. Under law and through the Maine Offshore Wind Initiative, offshore wind remains an important part of the state and regional long-term energy future. What offshore wind data, research, information, or other considerations should be considered in the development of the energy plan?

Other considerations in the development of the energy plan with regards to OSW:

- Increased meaningful engagement with each of the four federally recognized tribes in five communities in Maine and the Wabanaki Sustainable Energy Team around OSW hub port siting, data collection and fishery and marine wildlife monitoring
- Development of partnerships for the study of and monitoring of the Gulf of Maine with whichever tribal communities (or all) wish to engage
- Provision of financial resources to facilitate engagement capacity.
- Future workforce needs as compared to current availability

⁴ Orsted. One year of South Fork Wind. September 2025.

⁵ Acadia Center. Grid Action Report: Winter Coldsnap. February 2026.

⁶ Global Wind Energy Council. Global Wind Report 2026. April 2026.

⁷ Government of Canada; Government of Nova Scotia. Offshore Wind Strategic Direction Letter. September 2025.

Objective E: Expand Clean Energy Career Opportunities for Maine People and Advance Innovation

Question 2. Please comment on how the energy plan should consider job quality or other considerations as it relates to growing Maine's economy and supporting family-sustaining careers.

Regarding OSW, the 2027 Energy Plan should acknowledge the strong labor standards in the Maine Wind Energy Act, and seek to create procurement structures for offshore wind that support enforceable labor and workforce standards throughout offshore wind project development and associated supply chains. By supporting our local economy and providing appealing career opportunities in the clean energy sector, Maine can encourage its young adults to remain in-state.

The 2027 Energy Plan should outline near-term steps to lay the groundwork for the development of an offshore wind port in Searsport. While there is currently no active port proposal, and it is unlikely federal funding to support the development of the project would be available before 2029, there are important activities that can be undertaken in the near-term to ensure any port project that is developed has benefits to, and support from, surrounding communities. For example, in addition to the above-mentioned economic impact assessment, the state could pursue activities to engage the community around the changes that a port facility could bring, mapping assets and community needs, identifying community priorities, building capacity around economic development opportunities that would flow from port construction investments, workforce pathways for local community members, etc. These economic development and community engagement best practices are best conducted now, and will be important regardless of the final site of the port facility.

Question 7. Please comment on necessary trainings, education, or other information that should be considered for future Clean Energy Partnership programming.

Under the 2025 Energy Plan, the former agency responsible for the Energy Plan, GEO, through the CEP, convened an Advisory Group on pathways to clean energy careers. The Advisory Group was made up of members representing State government, industry, training and educational institutions, and labor organizations. We think that DOER should continue to convene that Advisory Group in the future to develop and certify apprentice and workforce readiness programs that will produce equitable benefits, worker protections, family-sustaining wages, and anticipate future needs and opportunities in building a clean energy workforce. We also suggest that the advisory group be expanded to include community-based and environmental organizations.

Amy Eshoo, Director, Maine Climate Action Now

Jackson Chadwick, Advocacy Director, Maine Youth for Climate Justice

Jack Shapiro, Climate and Clean Energy Director, Natural Resources Council of Maine

Scott Cuddy, Director of Policy, Maine Labor Climate Council

Draft Comments on 2027 [Maine Energy Plan RFI](#)

I. Introduction

Maine Labor Climate Council (“MLCC”) appreciates the opportunity to submit comments in response to the Department of Energy Resources’ (“DOER” or “The Department”) Request for Information regarding the 2027 Maine Energy Plan.¹ MLCC is a coalition of labor organizations that represent workers across Maine’s building trades, utility sector and related industries. Our coalition’s members build, maintain and operate the energy infrastructure that powers Maine’s homes, businesses and communities. We welcome the opportunity to contribute to the development of the 2027 Plan.

MLCC is supportive of the direction established in the 2025 Maine Energy Plan and commends DOER for its continued commitment to affordability, reliability and clean energy deployment. Our comments here address four substantive areas where we believe the 2027 Plan can be strengthened:

1. First, we recommend that DOER use the 2027 Plan to **establish a foundation for the development of a Maine Integrated System Plan** to link resource forecasting, procurement, infrastructure investment and workforce planning with an action plan.
2. Second, we recommend **DOER be authorized to serve as a central procurement administrator, directly contracting for clean energy attributes with comprehensive labor standards** embedded as an enforceable contract condition (as modeled by NYSEERDA and pending legislation proposed by Massachusetts’ DOER).
3. Third, we recommend DOER, along with the Maine legislature and the Maine Public Utilities Commission (“MPUC”), **evaluate how Maine’s electric utilities should be authorized to own clean energy generation and storage**, including distributed energy resources.
4. Fourth, we propose a suite of affordability-focused recommendations to **invest in clean energy resources and utilize public financing mechanisms** to reduce costs for Maine ratepayers.

These recommendations are framed principally as requests that DOER study, evaluate, and, where appropriate, make recommendations to the Legislature and other relevant state authorities. Recognizing the affordability pressures facing Maine ratepayers, MLCC urges DOER to ground its evaluations and analysis in Maine-specific bill impact modeling, including under scenarios that account for reduced federal support. We also urge DOER to consider these recommendations as a mutually reinforcing part of a complementary package of important policies for the 2027 Maine Energy Plan.

¹Maine Department of Energy Resources. “2027 Maine Energy Plan: Request for Information.” State of Maine, 25 Mar. 2026, www.maine.gov/energy/sites/maine.gov.energy/files/inline-files/DOER%202027%20Maine%20Energy%20Plan%20Request%20for%20Information.pdf.

II. Integrated System Planning

Relevant RFI Questions Part 3: Questions A² and B³; Part 4: Objective C Questions 1⁴ and 7⁵; Objective E Question 1⁶

A. Linking Different Processes

Maine’s energy planning is currently spread across multiple entities and processes occurring in parallel, which include: DOER’s biennial Energy Plan process, DOER’s solicitations under 35-A M.R.S.A. §10313, MPUC-directed utility grid plans to address distribution-level investment priorities, Efficiency Maine Trust’s triennial plan, and ISO-NE/NESCOE planning processes. In addition to each of these formal processes, the legislature periodically directs additional planning exercises, rulemakings or solicitations for either the MPUC or DOER to administer. We strongly believe that each of these serve an important purpose, and that each has produced valuable action and analysis to help inform our state’s energy infrastructure buildout. In particular, the DOER’s 2025 Energy Plan and Pathways to 2040⁷ report showcases significant advancements in Maine’s energy planning capacity – with demand modeling out to 2050, multiple decarbonization scenarios, and identification of resource needs across generation, storage, transmission, and distribution. In addition, the DOER’s five objectives of affordability, reliability, clean energy, efficiency and clean energy careers properly frame the state’s challenges.

But rather than continuing these processes and objectives functioning as parallel tracks, we urge the DOER to make recommendations to adopt a more integrated framework. We recommend combining these tracks, establishing a procurement schedule for specific megawatt targets by resource, and formally linking resource planning to transmission and distribution investment timelines, while incorporating a systematic labor analysis.

Ultimately, we urge the DOER to recommend that the legislature authorize the establishment of an Integrated System Planning (“ISP”) framework. E3 describes ISP as going beyond a high-level policy roadmap to establish a detailed, scenario-based investment roadmap that directly guides procurement, and that can be adjusted over time without requiring new legislation.⁸ As states across the country are beginning to adopt variations of the ISP framework,

²RFI Part 3, Question A: “Are the objectives from the 2025 Energy Plan still relevant? If not, what updates or changes would you suggest?”

³RFI Part 3, Question B: “What data, underlying assumptions, or analyses from the 2025 Energy Plan should be revised or prioritized in the 2027 plan?”

⁴RFI Objective C, Question 1: “Under law, DOER is required to identify approximate total project award targets for the next 3 competitive solicitations to be conducted by the department pursuant to 35-A M.R.S.A. §10313. Please comment on this requirement including priorities and considerations for the next three competitive solicitations and implementation of §10313.”

⁵RFI Objective C, Question 7: “Please comment on transmission and distribution capacity and infrastructure needs to facilitate deployment of new energy resources.”

⁶RFI Objective E, Question 1: “Please comment on workforce trends, needs, and priorities for Maine’s energy workforce, including new opportunities for Maine to lead.”

⁷ The Brattle Group and Evolved Energy Research. Maine Pathways to 2040: Analysis and Insights. Prepared for the Maine Governor’s Energy Office, Jan. 2025, www.maine.gov/energy/sites/maine.gov.energy/files/2025-01/Maine%20Pathways%20to%202040%20Analysis%20and%20Insights.pdf.

⁸E3. “Integrated System Planning: Holistic Planning for the Energy Transition.” Oct. 2024. Defines ISP as integrating generation, transmission, distribution, and customer/DER planning through a 3-step process: forecast system needs, perform system analysis, develop preferred plan and action plan. <https://www.ethree.com/isp-whitepaper/>

we believe that Maine can do so as well. The Maine ISP should be built around the following structural elements:

1. **Governance:** an ISP Joint Committee should be established to be led by DOER, with participation from other state agencies including MPUC, Office of the Public Advocate, the Department of Environmental Protection and the Department of Labor. It should be supported by an Advisory Committee composed of critical stakeholders, including representatives from labor, experts from utilities and clean energy development, and other impacted groups including tribes, environmental, consumer and community organizations. The Advisory Committee should have structured opportunities to provide recommendations on modeling scenarios, integrated system analysis and the development of the preferred portfolio and action plan.
2. **Three-Step Planning Process:** the ISP should be built around a three-step process, as described in ISP literature. In the first step, the Joint Committee would develop multiple scenarios forecasting future electricity system needs, including load growth, electrification of buildings and transportation, distributed energy resource (DER) adoption, infrastructure constraints and other drivers over 5-, 10-, 15- and 20-year horizons. In the second step, the Joint Committee would conduct an integrated system analysis across those scenarios, evaluating resource portfolios on the basis of cost, reliability, emissions, workforce and labor impacts, and consistency with Maine's statutory climate, energy and other policy objectives. Importantly, this analysis would evaluate generation, storage, transmission, distribution and distributed energy resource investments *together* as an integrated infrastructure portfolio rather than as separate, sequential decisions. In the third step, the Joint Committee would select a preferred portfolio and develop an action plan identifying near-term and mid-term actions necessary to implement the plan, including by identifying resource-specific procurement targets, procurement schedules, transmission and distribution investment plans, distributed energy resource strategies and labor and workforce recommendations.
3. **Mandatory Labor and Workforce (and Just and Equitable Transition) Analysis:** the ISP should include a rigorous labor analysis as a required component of the integrated system analysis. This analysis should include a sector-by-sector jobs analysis across construction, operations and maintenance, as well as manufacturing and decommissioning work, skill gap assessments, estimates of net job creations and displacement, by trade and geography, and evaluation of training capacity including registered apprenticeship programs. The analysis should specifically assess impacts on Maine's existing energy workforce – including workers represented by existing bargaining units in transmission, distribution, utility operations, substation and outside line construction, as well as generation and related trades – so that the ISP accounts for incumbent jobs alongside projected growth in additional clean energy occupations. Through this analysis, the DOER should identify policy actions necessary to protect the incumbent workforce, as well as deliver any new planned resources through a high-quality union workforce. In addition, this analysis should include a Just and Equitable Transition Analysis as described in Section II.B below.
4. **Direct Link to Procurement:** the ISP's preferred portfolio should directly drive DOER's competitive solicitations under § 10313, ensuring procurement is aligned with planning

rather than conducted ad hoc. In addition, these procurements should be conducted under a centralized procurement framework as discussed in Section III, below.

5. **Coordination with ISO-NE and Regional Partners:** The ISP should be developed in consultation with ISO-NE, electric distribution companies (“EDCs”), and local governments using standardized data inputs to ensure that the Maine state-level planning is compatible with regional transmission planning and with the planning efforts of neighboring New England states. Where the ISP identifies resources or transmission needs that can only be met through regional coordination, the action plan should include recommendations for engaging ISO-NE or NESCOE processes.

B. Just and Equitable Transition: The integrated approach we recommend, along with more specific planning, can provide a structured opportunity for Maine to plan for a just and equitable transition for the workers and communities who will be affected by the state’s evolving energy mix. In the past, state energy policy has been driven in part by ad hoc attempts to shutter energy sources perceived as having a negative climate impact, or to procure resources seen as beneficial, without being part of a holistic plan that actually projects in detail how Maine will power itself moving forward. A core function of the ISP should be to anticipate and plan for workforce transitions before they occur rather than responding after workers have been displaced. As the ISP Join Committee evaluates resource portfolios and identifies the pipeline of planned work, it must also examine which workforce segments may see reduced person-hours over time and develop concrete strategies (including retraining pathways, registered apprenticeship expansion, prevailing wage, transition employment, placement guarantees, bridge funding, and coordination with labor organizations - to transition affected workers to comparable work without losing their quality of life. These strategies should apply to both workers in the generation and fuel sectors, as well as incumbent workers in transmission, distribution, utility operations, substation, and outside line construction whose work profiles may shift as the resource mix changes. This planning function should be a required component of the ISP’s mandatory workforce and labor analysis.

In addition, by creating visibility into the pipeline of planned work, the ISP can support and benefit from the establishment of multi-year PLAs, sustained apprenticeship programs, and by directing a proactive workforce investment looking down the road, rather than responding after projects are trying to get built. As a recent DOER report highlighted, Maine’s clean energy workforce is growing at a fast pace, and there will be a need to ensure that our long-term planning efforts support and direct that growing workforce to be equipped with the right skills, and for the right technologies.⁹ In addition, embedding labor representation in the governance structure ensures workforce impacts are considered at the planning stage, not as an afterthought. Through this process, the preferred portfolio as adopted by DOER should explicitly be evaluated on whether it supports the creation of high-quality, well-paying union careers, including through registered apprenticeship programs and the application of labor standards such as prevailing wage, project labor agreements, and labor peace agreements.

⁹ BW Research Partnership. 2025 Maine Clean Energy Industry Report. Prepared for the Maine Department of Energy Resources, Mar. 2026, www.maine.gov/energy/sites/maine.gov.energy/files/inline-files/2025%20Maine%20Clean%20Energy%20Industry%20Report_Final.pdf. Finding that Maine had 16,171 clean energy workers at the end of 2024, with clean energy jobs growing three times faster than the state's overall workforce and outpacing national clean energy employment growth.

C. Recommendation

MLCC recommends that the 2027 Energy Plan analyze the benefits of, and recommend whether the Legislature should establish a Maine Integrated System Plan consistent with the analytical framework described in Section II.

III. Centralized Procurement with Labor Standards

Relevant RFI sections: Objective C Questions 1¹⁰ and 6¹¹; Objective E Questions 1¹² and 2¹³

A. Maine’s Progress on Centralized Procurement

MLCC commends the legislature and the Mills Administration for enacting P.L. 2025, ch. 476, elevating the Governor’s Energy Office to a cabinet-level Department of Energy Resources, and granting DOER new authority to conduct competitive solicitations for clean energy resources. This was a significant and necessary step to improve on the previous system of conducting clean energy procurement ad hoc, as directed by specific legislation.¹⁴ In addition, we are encouraged by DOER’s publication of an anticipated competitive solicitations schedule for 2026.¹⁵ MLCC supports the Department’s commitment to regular, scheduled solicitations informed by the Energy Plan and related analyses. As discussed in Section II above, however, we do recommend these solicitations be formally aligned through the adoption of an ISP framework.

In addition to recommending an ISP framework for planning, we recommend improving the current centralized procurement framework utilized by the DOER. Specifically, we urge the DOER to adopt a centralized procurement framework with direct contracting for unbundled clean energy attributes. By contracting for the clean energy attributes directly, the DOER will be able to flexibly target specific resources necessary to meet its clean energy targets in a timely and cost-effective manner, and better ensure state investments into energy infrastructure create good union jobs as an enforceable contractual requirement.

B. Direct State Contracting for Environmental/Clean Energy Attributes

Under the existing structure, DOER conducts solicitations for clean energy resources and selects projects, but the resulting contracts are ultimately executed between EDCs and developers. The utilities negotiate the contracts, administer compliance, purchase the energy and attributes, and then recover costs through PUC-approved tariffs.¹⁶ In many ways, this structure mirrors the model that Massachusetts has used since its Green Communities Act of 2008. The problem is that this model, while a significant improvement over previous ad hoc procurements, still

¹⁰RFI Objective C, Question 1: “Under law, DOER is required to identify approximate total project award targets for the next 3 competitive solicitations to be conducted by the department pursuant to 35-A M.R.S.A. §10313. Please comment on this requirement including priorities and considerations for the next three competitive solicitations and implementation of §10313.”

¹¹RFI Objective C, Question 6: “Please comment on how to address financial barriers to clean energy deployment. What financial tools would aid in greater deployment of small or large-scale energy generation resources?”

¹²RFI Objective E, Question 1: “Please comment on workforce trends, needs, and priorities for Maine’s energy workforce, including new opportunities for Maine to lead.”

¹³RFI Objective E, Question 2: “Please comment on how the energy plan should consider job quality or other considerations as it relates to growing Maine’s economy and supporting family-sustaining careers.”

¹⁴ P.L. 2025, ch. 476. An Act to Establish the Maine Department of Energy Resources. Signed 2 Jul. 2025.

¹⁵ Maine Department of Energy Resources. “Competitive Solicitations.” State of Maine, 19 Dec. 2025, www.maine.gov/energy/divisions/planning-policy/solicitations.

¹⁶ 35-A M.R.S.A. §3210-A.

constrains the state from functioning as a direct counterparty to clean energy developers. This in turn limits: 1) the state's ability to drive the clean energy investment necessary to meet clean energy targets; 2) the state's flexibility in adjusting to changing market conditions to ensure the investments save costs for ratepayers; and 3) the state's authority to enforce strong labor conditions as part of a binding contract. Although in its current role the state can influence bid evaluation criteria and set some threshold requirements, once a project is selected the state is constrained from enforcing its important policy priorities because it is not a counterparty in the agreement. It should be pointed out that the EDC-developer model only limits the state's ability to impact the market because the state is not a market participant in the current model, it does not impact pricing of energy in the way that state mandates do or a reliance on out-of-state fuels do. MLCC supported the changes made to the NEB program for this reason.

There are similar models, though, that might be more effective. One that is currently being used in New York, and another that is being proposed in Massachusetts. The New York model is the one used by the New York State Energy Research and Development Authority ("NYSERDA"). In New York NYSERDA serves as a central procurement administrator, issuing competitive solicitations and directly entering into contracts with generators for the purchase of Renewable Energy Certificates ("RECs"). Critically, NYSERDA contracts only for these unbundled environmental attributes – not for bundled energy and RECs. Generators then sell their energy independently into the wholesale market, while the REC contract with NYSERDA provides supplemental revenue needed to make projects financeable. There are then cost recovery mechanisms that essentially zero out the cost to NYSERDA. MLCC is not suggesting that the Maine Energy Plan seek to adopt the NYSERDA model, but that instead we study what NYSERDA is doing regarding RECs to see if Maine could do something similar, that is rigorously studied in the Maine context for its effects on ratepayers.

Massachusetts has reached similar conclusions about the limitations of its own contracting model. In its June 2025 Solicitation and Procurement Effectiveness Report, the Massachusetts DOER conducted a thorough independent review into the operational performance of other states' procurement models over the preceding several years. The Massachusetts DOER's analysis found that the single-state, technology-specific procurement model is insufficient to meet the Commonwealth's clean energy needs and recommended legislation to create a centralized framework in which the DOER would develop resource solicitation plans, issue RFPs, select projects, oversee contract negotiation and directly contract for environmental attributes, drawing explicitly on the NYSERDA model.¹⁷ The Massachusetts report represents a thorough analysis of procurement effectiveness in New England, and its conclusions are directly applicable to Maine.

MLCC recommends that the 2027 Maine Energy Plan evaluate and recommend whether the Legislature should authorize DOER to contract directly for the purchase of RECs and other clean energy attributes from a competitive solicitation process, while utilizing an indexed pricing mechanism to stabilize financing costs for ratepayers. Consistent with the framing in Section I,

¹⁷ Supra note 16.

this analysis should be grounded in Maine-specific modeling (taking into account Maine’s distinct market, ratepayer, and geographic conditions), while accounting for the full operational record of comparable frameworks in other states.

C. Labor Standards in Centralized Procurement

Relevant RFI Sections Objective C, Questions 1 and 6; Objective E, Questions 1 and 2.

Relatedly, MLCC urges DOER to require strong labor standards in all of its competitive solicitations under § 10313, and believes it can do so much more effectively as a direct contracting counterparty, as described above. Such labor standards should include: 1) the Maine Emerging Industries Compensation Threshold, 2) apprenticeship utilization requirements, 3) project labor agreement requirements, 4) labor harmony agreement requirements, 5) domestic content requirements, 6) contractor eligibility and accountability provisions and 7) robust bid evaluation criteria for workforce development. Such labor standards would ensure that the state’s clean energy investments create good local union jobs.

These standards should not be framed as optional preferences, but should instead be embedded as enforceable contract conditions, with monitoring and compliance mechanisms. Where legislative authority is needed to require specific standards, the Energy Plan should recommend such legislation. In addition, as New England states increasingly coordinate clean energy procurements across state lines, the 2027 Energy Plan should recommend that any multi-state procurement in which Maine participates include baseline labor standards applicable to all projects regardless of siting location. At a minimum, Maine should ensure that its own procurement standards apply to any project delivering energy to Maine ratepayers.

D. Recommendation

MLCC recommends that the 2027 Energy Plan analyze and recommend authorizing the DOER to serve as a central procurement administrator, directly contracting for clean energy attributes with comprehensive labor standards.

IV. Utility Ownership of Clean Energy Generation, Storage and DERs

Relevant RFI sections: Objective C Question 7¹⁸; Objective D Questions 2¹⁹ and 3²⁰; Objective B Questions 1²¹ and 2²²

Maine’s electric utilities and the workforce they employ are essential partners in delivering reliable, affordable, and clean energy to Maine ratepayers. The policy questions MLCC raises below are framed in that spirit: as an inquiry into how the institutional capacity and skilled workforce of Maine’s utilities can be more fully leveraged through DOER actions to drive the

¹⁸RFI Objective C, Question 7: “Please comment on transmission and distribution capacity and infrastructure needs to facilitate deployment of new energy resources.”

¹⁹RFI Objective D, Question 2: “Comment on opportunities to increase the efficient utilization of the electric grid.”

²⁰RFI Objective D, Question 3: “Comment on opportunities to increase load flexibility resources, particularly through voluntary consumer-enabled mechanisms.”

²¹RFI Objective B, Question 1: “Please comment on how grid resilience, reliability, and security should be considered in Maine energy planning and how the state should be tracking/considering reliability and resilience in this Plan?”

²²RFI Objective B, Question 2: “Are there new technologies or innovative solutions to advance reliability and resilience?”

pace and scale of investment that the state's climate, reliability, and affordability objectives require.

A. Reconsidering Maine's Restructuring: Utility Ownership of Generation and Storage

We urge the 2027 Maine Energy Plan to grapple directly with whether Maine's current restructured electric industry framework adequately positions the state to meet its clean energy and reliability objectives. While we are not proposing a wholesale reversal, private merchant developers alone have thus far been unable to adequately meet the pace and scale of investment necessary to meet the state's policy objectives, and the DOER should evaluate whether allowing utilities to *also* invest in clean energy generation, storage and DER projects can provide value.

On this issue, we raise three important considerations. First, distributed energy resources (DERs) are increasingly central to a clean grid (including solar, battery storage, demand response, electric vehicle charging infrastructure, etc.) and operate at the distribution level, where the case for utility involvement is strongest because of their experience and knowledge of where best to deploy such technologies. The 2025 Energy Plan and Pathways to 2040 report both emphasize the importance of distributed resources for managing distribution system peaks, enhancing resilience and reducing infrastructure costs.²³ Second, today the vast majority of DER constructions and operations work in Maine is performed by non-union contractors at small scale across many individual sites. This pattern risks creating a large, unregulated segment of the energy workforce that lacks wage protections, proper training standards, and safety requirements – all of which are critical to ensuring something as important as our electric infrastructure is properly built to actually achieve reliability without creating a race to the bottom in terms of working conditions. Third, allowing utilities to bid into clean energy generation (including thermal energy networks, "TENS"), storage and distributed energy procurements would expand the pool of bidders DOER could consider without in any way precluding merchant developers from participating as they historically have done and will continue to do.

Importantly, utilities participating in state-led procurements for clean energy generation, storage and DERs must require that construction, operations and maintenance work be performed under strong, enforceable labor standards, including collective bargaining agreements (as can be required under the centralized procurement framework described in Section III). This is critical to ensuring that the expanded authority translates into high-quality union work for Mainers, rather than being performed through separate corporate structures or workforces that would fall outside the utility's labor standards framework. If utilities are able to compete with other bidders for some set of projects that would help save costs for Mainers, DOER should give that serious consideration.

B. Green Mountain Power: estimated a positive net present value for each system: \$2,749

Already a Proven Model for Utility-Led DER Deployment

One nearby example of how utility ownership of distributed energy resources (including storage) can deliver significant savings to ratepayers while building system reliability is Vermont's Green Mountain Power ("GMP"). Since 2017, GMP has operated home battery programs that have

²³ See *supra* note 7.

grown into the largest dispatchable energy resource in Vermont.²⁴ Under its Energy Storage System lease program, customers lease utility-owned batteries for \$55 dollars a month (or for a one-time payment of \$5,500 over a ten-year lease).²⁵ These batteries provide customers with whole-home backup power during outages, while GMP retains operation control to dispatch them during peak events. By 2023, more than 2,500 customers had enrolled in the lease program, contributing 22 MW of storage, with a waitlist exceeding 1,000 customers. In GMP's August 2023 filing, they estimated a positive net present value for each system of \$2,749. Assuming 600 ESS program systems are installed annually, GMP expects a lifetime net-present value of \$4.9 million for the systems installed over the next three years.²⁶

This model demonstrated several principles directly relevant to Maine. First, utility ownership of distributed assets enables coordinated dispatch to create benefits and savings to ratepayers across the system. Second, the utility is able to channel the deployment, integration and operation of the distributed resources at scale. Third, the program has been popular with customers because it provides them with meaningful resilience benefits (backup power during outages) while sharing the broader grid value with the utility's full ratepayer base. Given the fact that Maine's electric distribution system is among the most storm-impacted in the United States (due to its severe weather exposure and an extensively forested terrain),²⁷ a GMP-modeled battery program could prove to be similarly popular here.

²⁴ Green Mountain Power. "GMP Requests Removal of Cap on Powerwall and BYOD Home Battery Programs to Expand Customer Access to Cost-Effective Backup Power." 26 Apr. 2023, greenmountainpower.com/news/gmp-requests-removal-of-cap-on-powerwall-and-byod-home-battery-programs/.

See also Vermont Public Utility Commission Order, Case No. 23-1408-PET, 17 Aug. 2023 (lifting program caps).

²⁵ Solar Power World. "Green Mountain Power Customers Can Now Lease Enphase Batteries for \$55/month." 13 Nov. 2025, www.solarpowerworldonline.com/2025/11/green-mountain-power-customers-can-now-lease-enphase-batteries-for-5-5-month/.

²⁶ See Tariff Filing of Green Mountain Power Corporation for Revisions to Energy Storage System Service and Bring Your Own Device Program Tariffs, Case No. 23-1335-TF, Final Order Approving Tariff Revisions (Vt. Pub. Util. Comm'n Aug. 17, 2023), epuc.vermont.gov/. Approving removal of the 5 MW annual capacity caps on Green Mountain Power's ESS and BYOD residential battery storage programs based on the Commission's adoption of findings that each ESS installation yields a projected positive lifetime net present value of \$2,749 per customer and an aggregate program net present value of approximately \$4.9 million over three years at 600 installations per year, with the BYOD program yielding an additional \$389 per system and \$1.1 million aggregate NPV over the same period.

²⁷ In 2024, the average Maine customer experienced 3.636 separate power interruptions totaling 1,748.6 minutes (over 29 hours) without electricity. By comparison, the U.S. national average that year was 1.531 interruptions and 662.6 minutes per customer, meaning Maine customers experienced more than twice the frequency and more than two-and-a-half times the total duration of outages of the average American electricity customer. This pattern is not anomalous: across the past decade, Maine has repeatedly ranked at or near the top of the nation in both metrics, reflecting the state's vulnerability to severe storms on a distribution system that runs largely overhead through extensively forested terrain. (See U.S. Energy Information Administration, Electric Power Annual 2024, Table 11.4 (SAIDI Values of U.S. Distribution System by State) and Table 11.5 (SAIFI Values of U.S. Distribution System by State), Oct. 2025, www.eia.gov/electricity/annual/. Figures reported are inclusive of Major Event Days under the IEEE 1366 standard. Maine's underlying reliability data is reported by Central Maine Power, Versant Power, and other Maine utilities to EIA on Form EIA-861, Annual Electric Power Industry Report, www.eia.gov/electricity/data/eia861/. See also U.S. Energy Information Administration, "Hurricanes in 2024 Led to the Most Hours Without Power in the United States in 10 Years," Today in Energy, 1 Dec. 2025, www.eia.gov/todayinenergy/detail.php?id=66744.)

Maine can and should take similar action here to allow utilities to help drive clean energy deployment, albeit under strict regulatory oversight and with safeguards.

C. Recommendation

MLCC recommends that the 2027 Energy Plan analyze whether and how Maine’s electric utilities should be authorized to own and operate clean energy generation, storage and DER resources (including TENs), and make recommendations to the Legislature based on a Maine-specific analysis consistent with the framework described in Section IV. In addition, any such authorization for utilities to own generation, storage and DERs should require that the resulting construction, operations, and maintenance work be performed under bargaining agreements, consistent with the procurement-based labor standards framework described in Section III.

V. How to Improve Affordability

Maine households and businesses have experienced significant increases in costs in recent years, driven by rising wholesale market prices, a growing reliance on volatile natural gas for winter generation, and global commodity price volatility. MLCC shares concerns about energy affordability in Maine and we believe the 2027 Energy Plan should treat affordability not as a constraint on clean energy deployment, but as an objective that thoughtful clean energy investments can directly advance. To that end, we identify two categories of action: (1) public financing mechanisms that can lower the cost of capital for energy infrastructure, and (2) targeted investments in clean energy resources that provide both emissions reductions and price stability for ratepayers.

A. Public Financing for Energy Infrastructure

Potentially relevant RFI sections: Objective C Questions 6²⁸ and 7²⁹

The cost of capital is one of the largest determinants of the lifetime cost of energy infrastructure. Public financing mechanisms can reduce the cost of capital for large infrastructure projects and pass these savings through to ratepayers through a variety of potential financial instruments. Emerging analyses demonstrate that the magnitude of these savings could be substantial. A 2024 analysis commissioned by Net-Zero California and the Clean Air Task Force, examining California's \$46-63 billion transmission buildout under the California Independent System Operator's 20-Year Outlook, found that a public-private partnership financing model could reduce ratepayer costs by up to 57 percent compared to the traditional investor-owned utility financing model (equal to approximately \$3 billion in annual savings, or \$123 billion over a 40-year asset lifetime).³⁰

²⁸RFI Objective C, Question 6 (same as fn 10).

²⁹RFI Objective C, Question 7 (same as fn 5).

³⁰ Clean Air Task Force and Net-Zero California. *Wired for Savings: Evaluating the Impact of Alternative Transmission Financing and Development Models on California Ratepayers*. Oct. 2024, cdn.catf.us/wp-content/uploads/2024/10/31145139/wired-for-savings.pdf. The underlying financial analysis was prepared by DHInfrastructure and EE-Analysis. The 57 percent figure represents savings under a public-private partnership lease model (in which a publicly-owned entity finances the asset while a private company builds and operates it) relative to a traditional investor-owned utility financing and development scenario applied to the California Independent System Operator's 2024 20-Year Transmission Outlook portfolio. Key drivers of cost savings include use of low-cost public debt to replace equity in the capital structure, competitive solicitation of developers, tax-exempt public ownership, and efficient private operations.

Closer to home, a forthcoming analysis from the Acadia Center and partner organizations indicates that transmission costs in New England could be cut by more than 40 percent through public financing mechanisms, with the same principles potentially extendable to distribution utility investments.³¹ While the precise magnitude of potential savings for Maine would require further study calibrated to Maine's specific transmission and distribution investment pipeline, these analyses suggest that the affordability benefits of public financing are quantifiable, regionally relevant, and potentially significant relative to the scale of investment Maine will need to make in the coming decade. This approach may be applicable across a wide range of investments, including not just transmission, but also generation, storage, and TENs. Where public financing is provided, the state should ensure that labor standards are conditions of the provision of such financing to ensure workforce protections are built into the foundation of energy infrastructure investment.

MLCC recommends that the 2027 Energy Plan include specific recommendations on public financing mechanisms appropriate to Maine's needs, including an evaluation of whether already-existing state authorities can be expanded or what new legislative authority is needed. We look forward to engaging with the DOER and other stakeholders on the specific design of such mechanisms.

B. Invest in Clean Energy Resources that Support Affordability

Relevant RFI sections: Objective C Questions 2³², 3³³, and 4(c)³⁴; Objective A Question 5³⁵

Offshore Wind Energy

Offshore Wind ("OSW") is one of the best-positioned clean energy resources to help reduce Maine and New England's exposure to winter natural gas price volatility and thus promote affordability, and we urge the 2027 Energy Plan to recommend the continued development of this industry here in Maine.

Unlike most renewable resources, offshore wind produces its highest output in winter, precisely when regional demand peaks and when gas supply is most constrained as evidenced by the performance of Vineyard Wind during Winter Storm Fern in January 2026. During this storm, Vineyard Wind achieved a 75 percent capacity factor, matching or exceeding the performance of New England's most efficient natural gas plants.³⁶ In addition, a February 2026 analysis by the Union of Concerned Scientists quantified the reliability benefits of offshore wind for New

³¹ Dickerson, Jamie. "Climate and Affordability Do Go Hand in Hand. So Must Courage." Acadia Center Blog, 31 Mar. 2026, acadiacenter.org/climate-and-affordability-do-go-hand-in-hand-so-must-courage/ ("Forthcoming analysis in New England (from Acadia Center and partners) suggests transmission costs could be cut by an enormous 40+%, and there's no reason why a similar model couldn't be applied to distribution utility investments too."). Full underlying analysis forthcoming.

³²RFI Objective C, Question 2: "What offshore wind data, research, information, or other considerations should be considered in the development of the energy plan?"

³³RFI Objective C, Question 3: "Please comment on the feasibility and/or costs of developing advanced nuclear technologies in Maine."

³⁴RFI Objective C, Question 4(c): "Considerations for developing district geothermal systems on brownfield sites."

³⁵RFI Objective A, Question 5: "Are there other approaches that Maine should consider to reduce energy costs and price volatility?"

³⁶Gallucci, Maria. "Offshore Wind Showed Up Big During the East Coast's Brutal Cold." Canary Media, 12 Feb. 2026. Vineyard Wind 75% capacity factor during Winter Storm Fern.

England’s winter grid. This analysis found that if Vineyard Wind and Revolution Wind (with their combined capacity of approximately 1,500 megawatts) had been fully operational during winter 2024-2025, the number of days on which regional energy demand exceeded the shortfall threshold would have fallen from 53 to 24 (out of 90 winter days).³⁷ The Oceanic Network estimated that offshore wind could have saved ratepayers over \$800 per megawatt-hour during the worst of the January 2026 winter storm due to stable offshore wind pricing of approximately \$80 to \$90 per megawatt-hour.³⁸ ISO New England has itself acknowledged that these projects are “particularly important to system reliability in the winter, when offshore wind output is highest and other forms of fuel supply are constrained.”³⁹

Natural gas will have to remain an important component of New England’s electricity supply for the foreseeable future, and it plays a legitimate role as a complement to variable renewable energy resources. However, we believe that Offshore Wind will also play an important role for New England’s electricity supply in the foreseeable future, and recommend that the 2027 Energy Plan treat the continued development of offshore wind, including floating wind in the Gulf of Maine, as a central pillar of the state’s affordability strategy.

Nuclear Energy

MLCC supports the inclusion of nuclear generation in Maine’s Class III clean resource category⁴⁰, and recommends that the 2027 Energy Plan evaluate whether and how nuclear energy can provide a stable and affordable source for clean firm energy.

Thermal Energy Networks

MLCC recommends the 2027 Energy Plan advance two specific policy proposals regarding TENs. First, the Plan should recommend that utility-owned TENs be an eligible category of utility investment under whatever framework the legislature ultimately establishes for TENs in Maine.⁴¹ Second, the Plan should recommend that utility-owned TENs count toward RPS and CES compliance through a methodology that credits the electricity savings from displaced fossil fuel heating, whether through thermal renewable energy certificates or through deemed electricity savings calculations. The specific methodology for TENs contributions to RPS/CES compliance is certainly a technical question that would benefit from further stakeholder engagement, and MLCC is eager to participate in that discussion.

Weatherization and Energy Efficiency

Reducing energy waste is the most direct and cost-effective path to lowering household energy costs. Studies have shown time and time again that every dollar invested into weatherization and energy efficiency can deliver multiple dollars in lifetime bill savings, while also reducing peak demand, deferring otherwise expensive infrastructure investments, and cutting greenhouse gas emissions. Efficiency Maine Trust’s Triennial Plan VI established targets including the

³⁷Muller, Susan. UCS, Feb. 2026. Vineyard Wind + Revolution Wind could have reduced winter shortfall days from 53 to 24 out of 90.

³⁸Oceanic Network, cited in NHPR, 30 Mar. 2026. OSW: \$80–90/MWh vs. prices exceeding \$800/MWh.

³⁹ISO-NE, Dec. 2025: “These projects are particularly important to system reliability in the winter when offshore wind output is highest and other forms of fuel supply are constrained.”

⁴⁰P.L. 2025, ch. 386 (LD 1868). Class III “clean resource” includes nuclear and large-scale hydro.

⁴¹See Resolves 2025, ch. 67 (LD 1619). DOER TENs RFI, Sep. 2025. Asks about ownership, rate design, labor needs including apprenticeship.

weatherization of approximately 9,900 homes and full heat pump conversion for approximately 38,000 homes over the three-year period that the plan covers. MLCC supports these targets and encourages DOER to consider how the 2027 Energy Plan can reinforce and expand on the work of Efficiency Maine Trust.

In addition, we recommend that the Plan recommend the following labor standards for this type of work: 1) certified contractor requirements for any work funded by ratepayer dollars (ensuring that installations are performed by trained, qualified workers), 2) the adoption of the emerging industry wage threshold to ensure that this efficiency work pays family-sustaining wages, and 3) bundled procurement to ensure that contractors can properly invest in workforce development by aggregating projects to provide predictable multi-year work pipelines.

VI. Conclusion

The Maine Energy Plan has the opportunity to help deliver a cleaner energy system, with a more reliable grid, at a lower cost for ratepayers while creating good union jobs to sustain Maine families. MLCC's four recommendations are mutually reinforcing to this end, and we urge DOER to consider them as a complementary package:

1. **Integrated System Planning** can establish the framework to link resource forecasting, procurement, infrastructure investment, and workforce planning into a coordinated process with specific procurement targets, and, ultimately, an action plan.
2. **Centralized procurement** with the DOER as a direct contracting counterparty can provide the mechanism to execute on that action plan, with embedded labor standards.
3. Allowing for **utility ownership of clean energy generation**, storage and DERs can channel deployment through institutions with the technical expertise needed, and an already-trained and skilled workforce.
4. And **targeted affordability investments into clean energy technologies**, including through public financing mechanisms, for offshore wind, thermal energy networks, nuclear and energy efficiency/weatherization programs can help reduce cost pressures on Maine ratepayers while advancing the state's climate goals.

MLCC looks forward to continued engagement with DOER throughout the planning process.

Respectfully submitted,

MLCC

From: [Chelsea Moody](#)
To: [DOER](#)
Subject: Energy Plan RFI
Date: Friday, April 24, 2026 2:56:39 PM

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.

Hello,

My name is Chelsea Moody and I am a recent graduate of Bowdoin College and current graduate student studying Climate Science and Policy at UC San Diego's Scripps Institution of Oceanography. As a lifelong New Englander and someone planning on returning to Maine after graduation, I care deeply about the energy challenges facing Maine. My graduate work focuses on the ways in which Maine can utilize distributed energy resources (DERs) as well as virtual power plants (VPPs) to address challenges with electricity affordability, grid resilience, and emissions reduction. Below are my responses to several of the questions on DOER's current RFI.

Objective A - Questions 2 and 3

The Energy Plan should continue prioritizing expansion of clean distributed energy. DER expansion is a key strategy to provide Mainers with affordable energy that also improves reliability and creates a more flexible energy system. DERs reduce strain on the current centralized grid, which improves reliability, while also reducing reliance on capital-intensive expansions of the current distribution system. Expanding clean DERs and coordinating them via VPP programs also reduces reliance on costly peaker plants. Prioritizing storage expansion will also be key in improving reliability and affordability. Improving storage capacity allows Maine to maximize current renewable capacity and move towards greater utilization of renewables in the future. Expanding storage will also likely reduce reliance on peaker plants, especially as Maine seeks to increase electrification.

Electrification through DER adoption with technologies such as heat pumps, smart thermostats, and EVs can provide significant savings for households and communities with high energy burdens. Recent global events are hitting those utilizing home heating oil and natural gas particularly hard via price volatility. Moving away from reliance on fossil-fuel based home heating is a powerful strategy for reducing energy burdens, and the state is making strong progress. However, those who could benefit most face significant barriers to adoption, primarily due to high upfront costs. Efficiency Maine and the state more broadly are making great strides towards lowering upfront costs for low- and middle-income households, and this work should be a key feature of the 2027 Energy Plan. Improving efficiency is also a powerful tool for high-burdened households, especially with the state's aging building stock. Greater efficiency makes beneficial electrification a much more attractive option for consumers. The Energy Plan should consider ways in which the state can support the many community-based "energy coaching" initiatives that are starting across Maine as well as how to structure greater incentives for improving home and business efficiency.

Objective B - Questions 2 and 5

The Energy Plan should work towards a strategy for VPP adoption in Maine. VPPs provide a pathway to advance both reliability and resilience. Maine has strong clean, electric DER

adoption. This means there is a lot of potential clean capacity spread throughout the state – capacity that the state could tap into by coordinating DERs via VPP programs. VPPs advance reliability by allowing for real-time demand response/management, reducing stress on the grid, and helping facilitate a two-way flow of electricity. VPPs advance reliance by reducing the need to install new, capital-intensive infrastructure. Maine’s current distribution system is vulnerable to natural hazards such as tree fall and flooding, and these hazards will likely intensify as the effects of climate change worsen. Utilizing VPPs allows the state to lessen reliance on the distribution system as demand grows. This also allows communities to take a front seat in their energy future. Instead of constant reliance on distant power plants, they can utilize the already or soon-to-be-installed DERs within their community to generate, distribute their own power, and extract real monetary value from their DERs while avoiding the permitting and cost challenges associated with larger, utility-scale projects.

There are many pathways towards VPP adoption in Maine, including a state mandate that utilities develop a program, an expansion of Efficiency Maine’s demand response programs, or a market-based strategy that relies mainly on private aggregators. This plan should sketch out a strategy for exploring those pathways and consider the ways in which VPPs can advance reliability and resilience while lowering electricity costs.

Weather will likely become more volatile in coming years as the effects of climate change worsen. Greater load flexibility will be essential in the face of this volatility. VPPs and encouraging more widespread adoption of DERs will help move Maine towards this necessary flexibility and improve coordination.

Objective D - Questions 2,3, and 4

VPPs maximize the use of existing grid infrastructure by coordinating already-installed DERs. This Energy Plan should sketch out options for VPP adoption in Maine in order to create a more efficient, reliable, and resilient grid.

EVs are essentially batteries on wheels, and thus offer an opportunity for vehicle-to-grid power through bidirectional chargers. Bidirectional charging broadens Maine’s options for VPP adoption. Creating strategies to increase availability of bidirectional charging also provides more options for consumers to extract value from their DERs (in this case, light-duty EVs) and can also provide commercial and industrial stakeholders options to extract more value from their DERs if using electric medium- and heavy-duty vehicles. DOER should continue expanding on its strategies in the 2025 Energy Plan to identify ways to facilitate integration of vehicle-to-grid technologies. This energy plan should also consider methods to make EVs more affordable for renters, such as split incentives for tenants and landlords for installing charging infrastructure. EV adoption will not be successful unless the technologies are accessible for all Mainers.

Thank you for your time. Please feel free to reach out with any questions.

Cheers,
Chelsea Moody

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Chelsea Moody
she/her
Scripps Institution of Oceanography

MAS, Climate Science and Policy





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

Submitted via electronic mail to doer@maine.gov

April 27, 2026

**Re: MREA Response to 2027 Maine Energy Plan Request for Information, Issued
March 25, 2026**

To Whom It May Concern:

On behalf of the Maine Renewable Energy Association (“MREA”), thank you for the opportunity to respond to the Department of Energy Resources (“DOER” or “Department”) Request for Information (“RFI”), issued March 25, 2026, regarding the development of the 2027 Maine Energy Plan (“2027 Plan”). MREA’s members, including wind, solar, biomass, and hydropower developers and generators, battery energy storage system developers and operators, and suppliers of good and services to the renewable energy industry, strongly support Maine’s goal to achieve 100 percent clean energy by 2040 as a leading strategy to create jobs, stabilize or reduce energy costs, and to otherwise improve Maine’s economy.

Expanding renewable energy generation capacity, maintaining existing generation capacity, and causing renewable energy resources to be accessible to more Maine people is part and parcel of an affordable 2027 Plan. Short-term relief from burdensome energy costs at the household and small business level can be realized through increased accessibility for behind-the-meter distributed generation resources, including solar and storage, as well as elimination of Maine’s “two bill” community solar paradigm, which renders much of Maine’s existing solar capacity inaccessible to low-income residents. At the same time, the 2027 Plan must maximize the Department’s new solicitation authority, regularly procuring both new and existing in-state, grid-scale generation that will stabilize costs and demonstrate that Maine is a welcome place to invest with predictable, reasonable regulation and low soft development costs like permitting and interconnection.

The Department will publish the 2027 Plan just as Maine welcomes a new administration. MREA strongly urges the Department to include specific recommendations for legislative and administrative action so as to avoid any lag in the Department’s momentum. A clear, action-oriented 2027 Plan will support the predictability that investors demand, as well as assuage Maine people that are clamoring for a path out of the current energy affordability crisis.

MREA offers the following comments in direct response to “Questions of Interest” or prompts in the RFI.

The RFI acknowledges, though perhaps understates, that Maine’s energy landscape has evolved since the release of the 2025 Maine Energy Plan (“2025 Plan”) and asks respondents to identify **“market, policy, or economic shifts that have occurred in 2025/2026”** that they deem most consequential for energy planning in Maine and the impacts of the changes and how they should be addressed in the 2027 Plan.¹ MREA offers the following market, policy, or economic shifts for the Department’s consideration:

- **Federal policy action regarding offshore wind deployment in the Gulf of Maine.** Included in the Trump Administration’s myriad efforts to stop or stymy offshore wind energy development in federal waters - many successful, others not² - is the elimination of wind energy areas in the Gulf of Maine.³ A key action in the 2025 Maine Energy Plan is to “responsibly procure 3,000 MW of offshore wind energy in the Gulf of Maine by 2040”.⁴ Though MREA strongly supports Maine’s procurement of offshore wind energy and the overall development of the offshore wind industry in the state, it is abundantly clear that this action will not be achieved on the timeline envisioned in the 2025 Plan. We encourage the Department, as part of the 2027 Plan, to look to in-state, onshore renewable energy resources to fill the offshore wind “gap.” To a lesser extent, the Department could also pursue multi-state procurement of offshore wind resources outside of the Gulf of Maine, but in-state renewable energy development should be prioritized.
- **ISO-NE’s continued pursuit of increased transmission capacity.** Increasing north-south transmission capacity in New England is a key component of Maine’s and the region’s clean energy transition and is critical to the development and maintenance of renewable resources in Maine. ISO New England (ISO-NE) is in the midst of selecting proposals submitted for its longer-term transmission planning (LTTP) procurement, which is specifically designed to support 1,200 megawatts of new onshore wind in northern Maine and reduce transmission constraints. Currently, energy produced in Maine is subject to a transmission bottleneck that has significant cost implications - including congestion issues that plague current biomass, hydropower, and onshore wind facilities. The importance of a successful procurement and the completion of the selected project or “solution” can not be understated. The 2027 Plan must prioritize

¹ See 2027 Maine Energy Plan Request for Information, Issued March 25, 2026, pages 6-7.

² Kelsey Tamborrino, *Judge Blocks Trump Admin’s Actions Targeting Wind and Solar*, E&E News (Apr. 21, 2026, 1:19 PM), <https://www.eenews.net/articles/judge-blocks-trump-admins-actions-targeting-wind-and-solar/>

³ See Peter McGuire, *Federal Regulators Eliminate Gulf of Maine Wind Power Zone*, Maine Public (July 31, 2025, 5:05 PM), <https://www.mainepublic.org/climate/2025-07-31/federal-regulators-eliminate-gulf-of-maine-wind-power-zone>

⁴ See Me. Dep’t of Energy Res., *Maine Energy Plan 37* (Jan. 2025), <https://www.maine.gov/energy/sites/maine.gov.energy/files/2025-01/Maine%20Energy%20Plan%20January%202025.pdf>

increasing transmission capacity as a fundamental element of Maine’s clean energy transition.

- **The creation of the Department and its regular procurement authority.** In addition to creating the Department of Energy Resources, Public Law 2025, Chapter 476 made the Department responsible for initiating and conducting competitive solicitations for renewable and clean energy resources every two years.⁵ Regular procurement authority sends a strong signal to the renewable energy industry that Maine is a reliable place to do business. This not only supports the renewable energy development community, but provides stability to general contractors, electrical and environmental engineering firms, and other “support” firms that provide thousands of Maine jobs in the planning, designing, construction, and operation of renewable energy projects. Regular procurements also support lower project costs. With a clear view of nearer term opportunities to bid-in projects and less time between procurements, renewable energy developers’ carrying costs (costs to hold land leases, maintain operation-ready projects, etc.) are decreased, allowing for lower bid prices, which are passed along to ratepayers. Reasoned, transparent exercise of this authority must be a part of the 2027 Plan, including aligning procurements with ISO-NE timelines.⁶
- **Retroactive changes to existing community solar projects and the end of the majority of the net energy billing program.** Public Law 2025, Chapter 430 ended Maine’s front-of-the-meter net energy billing program and imposed significant, retroactive fees on existing solar and hydropower facilities. Imposing retroactive fees on projects with often inflexible financial obligations puts those projects at risk and has dampened investor confidence in Maine across technologies and scales. Furthermore, by putting projects at risk, project customers that rely on “community solar” to reduce their electricity bills are also at risk at a time when energy costs are uncommonly high. The 2027 Plan must prioritize developing and implementing a new, durable distributed generation and storage program that will attract investment back into the state. The program may have multiple elements, though MREA members have identified a particularly strong need and opportunity for a behind-the-meter program for commercial and industrial customers, who are particularly sensitive to fluctuations in energy costs. Onsite generation and storage leverages existing infrastructure and minimizes grid upgrade costs, providing durable savings directly to participants.

The RFI also prompts respondents to comment on **existing resources and feasibility and opportunities for expansion of existing resources.**⁷ MREA members include the owners and operators of the majority of existing renewable energy resources in the state, including biomass, hydropower, and wind resources. Existing renewable energy resources are a reliable,

⁵ See 35-A Me. Rev. Stat. § 10313 (2025).

⁶ Regarding the Department’s next three competitive solicitations, MREA recommends that they (1) include awards for existing resources; (2) not commingle project sizes and types (i.e., grid vs. distributed generation, existing vs. new generation); and (3) indicate qualitative preferences with as much specificity and notice as possible.

⁷ See 2027 Maine Energy Plan Request for Information, Issued March 25, 2026, page 8.

cost-effective component of Maine's clean energy portfolio. The 2027 Plan must prioritize maintaining these resources, which MREA members resoundingly agree should be done by maintaining Maine's Renewable Portfolio Standard⁸, including regular and predictable procurement of existing resources. Existing resource support should also include reasonable state standards and decision-making regarding relicensing (particularly for hydropower and biomass facilities) that does not deter continued investment and ownership, as well as increased north-south transmission capacity to relieve current (and increasing) congestion. Notably, no MREA members that own or operate existing hydropower resources are focused on expanding those resources - instead, their focus is on retention of baseline output and maintenance.

Existing *grid* resources should also be accounted for in the 2027 Plan. Efficient utilization of existing grid infrastructure, including adopting flexible interconnection practices, encourages new resource development without unnecessary grid upgrade costs. MREA encourages the Department to read MREA comments submitted in Maine Public Utilities Commission (Commission) Docket Number 2025-00303, in which we offer specific recommendations for incremental steps toward enabling more distributed energy resource interconnection, beginning with only minor regulatory change and little or no capital investment, and to incorporate those recommendations into the 2027 Plan.⁹ Prior comments from MREA in the same docket advocate for changing utility interconnection study practices for battery energy storage systems, which currently are not consistent with how the systems actually operate and may incur costs that deter project investment.¹⁰ MREA recommends that the Commission adopt rules that call for studying storage systems on operational schedules.¹¹ This recommendation, along with recommendations regarding flexible interconnection, are critical to a cost-effective clean energy transition and should be incorporated into the 2027 Plan.

Similar to the RFI's prompt regarding existing resources, the RFI asks for comment on **"emerging technologies that could safely and effectively improve or expand existing hydroelectric power generation capacity in the state"**.¹² Again, MREA members include the owners and operators of the majority of hydropower resources in the state. Those members are not focused on emerging technologies to expand hydroelectric power generation capacity in the state. Instead, those members are focused on retention of baseline output and maintenance. Occasionally, those members may look at new technologies to create efficiencies, including regarding fish passage. However, that analysis and decision-making is facility specific and limited to those incremental opportunities.

⁸ See 35-A Me. Rev. Stat. § 3210 (2025).

⁹ See Maine Renewable Energy Association *MREA PO Response 2025-000303*, Docket No. 2025-00303 (Me. Pub. Utils. Comm'n March 30, 2026).

¹⁰ See Maine Renewable Energy Association *MREA Comments Docket No. 2025-00303*, Docket No. 2025-00303 (Me. Pub. Utils. Comm'n November 17, 2025).

¹¹ *Id.*

¹² See 2027 Maine Energy Plan Request for Information, Issued March 25, 2026, page 11.

The RFI asks, “**What financial tools would aid in greater deployment of small or large-scale energy generation resources?**”¹³ MREA offers the following for the Department’s consideration:

- **Increase state permitting capacity and make targeted permitting reforms.** Even taking into account U.S. federal tax subsidies, grid-scale solar and onshore wind are the least cost new energy resources.¹⁴ As such, the 2027 Plan must include strategies that reduce “soft costs” associated with developing those projects, such as permitting reform. Permitting reform should include increased staff capacity (including increased staff retention) at the Maine Department of Environmental Protection, as well as (1) transparent, enforced permit review timelines; (2) elimination of redundant permitting standards; and (3) reduction of required mitigation payments and requirements, all of which will serve to reduce project costs for new renewable energy development.
- **Study battery energy storage systems consistent with how they operate.** As previously commented, Maine utilities currently study battery energy storage systems as if they are charging during peak load hours and discharging during low load hours. This is not how the systems operate in practice and trigger exorbitant grid upgrades, which either increase project costs or deter project development all together. MREA has recommended that the Commission adopt rules that call for studying storage systems on operational schedules¹⁵ and recommends that the 2027 Plan include the same.
- **Increase transparency and predictability of interconnection costs.** As described in MREA filings in Commission Docket Numbers 2026-00055 and 2025-00303, distributed generation developers have been pummeled with interconnection cost overruns in the millions of dollars. This, coupled with unsubstantiated “pooled costs” (also in the millions of dollars), is stifling new project development and/or resulting in unnecessarily inflated energy costs. MREA has recommended that the Commission open a full investigation and implement policy changes to prevent these issues going forward. The 2027 Plan must do the same.
- **Cause municipal taxation of grid- and distribution-scale generation to be consistent and predictable.** The 2027 Plan should recommend such policy changes as a strategy to clearly convey the value that renewable energy development can and does bring to Maine municipalities and create predictability for developers looking to make substantial investments in Maine. MREA applauds the Department’s current work pursuant to Resolves 2025, Chapter 116, “Resolve, to Require the Governor’s Energy Office to Study Taxation of Renewable Energy Infrastructure” to examine and evaluate

¹³ *Id.* at 12.

¹⁴ See Lazard, *Lazard’s Levelized Cost of Energy*+ 9 (Version 18.0, June 2025), <https://www.lazard.com/media/5tlbhyla/lazards-lcoeplus-june-2025-vf.pdf>.

¹⁵ See Maine Renewable Energy Association *MREA PO Response 2025-000303*, Docket No. 2025-00303 (Me. Pub. Utils. Comm’n March 30, 2026).

system of taxation of renewable energy infrastructure and recommends that its findings serve as the basis for that portion of the 2027 Plan.

- **Allow for the use of meter socket adapters and other power control systems.**

MREA recommends that the 2027 Plan direct the Commission to initiate rulemaking to allow the use of meter socket adapters (MSAs) by Maine utilities and to otherwise remove regulatory barriers to their installation. MSAs cost-effectively simplify connecting residential solar, EV chargers, battery energy storage systems, and other new electric loads to existing home electric service. Many utilities in New England and across the country have updated their standards to allow MSA installations. However, Maine utilities either prohibit or severely restrict their use.

Thank you for your consideration of our comments. MREA plans to remain actively engaged in the development of the 2027 Plan and welcomes follow-on questions from the Department.

Sincerely,

A handwritten signature in cursive script that reads "Eliza Donoghue".

Eliza Donoghue
Executive Director
Maine Renewable Energy Association

Submitted via email to Maine Department of Energy Resources: doer@maine.gov

April 27, 2026

Maine Department of Energy Resources

62 State House Station

Augusta, Maine 04333

To the Maine Department of Energy Resources,

National Grid Ventures (NGV) appreciates the opportunity to respond to the 2027 Maine Energy Plan Request for Information, issued March 25, 2026.

NGV is the competitive arm of National Grid PLC's core businesses in the US and UK, where it develops, operates, and invests in infrastructure projects and businesses that connect customers across the Northeast with reliable, affordable energy. NGV operates thirteen generation stations across Long Island, New York, to provide reliable power that becomes vital during periods of high demand, as well as an LNG facility in Providence, Rhode Island which maintains a reserve of gas to meet peak heating demand on the coldest days. NGV partnered with RWE to develop offshore wind in the area off New York/New Jersey in a project called Community Offshore Wind. The joint venture has paused development on the project as a result of market conditions, but they remain committed to working closely with federal and state administrations to expand and maintain the energy system at an affordable cost. NGV is also part owner of NY Transco which develops, constructs and operates transmission lines as part of NYISO's competitive transmission processes. In addition to NGV, National Grid also owns and operates regulated utilities in the Northeast US.

In Europe, NGV has developed and operates the world's largest fleet of submarine interconnectors, comprised of 7.8 GW between the United Kingdom and Belgium, France, The Netherlands, and Norway. Two of its lines, Viking Link and North Sea Link, are respectively the longest land and submarine HVDC cables in the world. Currently NGV is innovating through LionLink, a new type of hybrid offshore asset that will allow clusters of offshore wind farms to connect to multiple countries at once.

NGV believes that a well developed Energy Plan is the foundation for an energy system that can serve Mainers reliably, affordably, and sustainably, and we share these comments in support of that effort.

Respectfully submitted,



Julia Collins

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National Grid Ventures

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Part 1: Engaging in Maine's Energy Plan

A key part of this effort is seeking public input into the planning process and reflecting that input in the final Energy Plan. DOER plans to host a series of public meetings, stakeholder interviews, and public comment opportunities with the goal of engaging Maine people and interested parties in the development of the Plan. DOER welcomes input on how to most effectively engage stakeholders across Maine in this work.

- A. What recommendations do you have regarding the best ways to engage and solicit feedback from the public throughout the energy planning process in calendar year 2026?

Public meetings and open comment periods are standard and useful means of soliciting feedback and could be useful for this process. However, feedback can sometimes be limited only to those vested in or passionate about an issue, which can leave gaps. The state could additionally consider use of technology and social platforms to expand reach to people who may not otherwise engage in the public policy process. In addition, depending on resourcing, the state could consider convening councils, subcommittees, or working groups, and could conduct polling for more targeted feedback and data.

- B. Are there any regional or geographic considerations DOER should consider when planning outreach and engagement?

N/A

- C. Are you or your organization interested in participating in stakeholder meetings (virtual or in-person), small group discussions, or having DOER present to your organization or community about the planning process? If so, what format works best for you?

NGV is happy to participate in both virtual and in-person forums. We do not have a preference.

- D. Are there specific topics that you would most like to see covered in public meetings or workshops?

Public meetings and workshops should have an educational component to help make tangible the local and statewide benefits of these projects to Mainers. One way to do this is to tie the link between Maine's clean energy and reliability goals and the need for routing and permitting cooperation to build the infrastructure to support those goals. Another useful component would be a discussion of cost allocation for regional, interregional, and interstate transmission. This can help combat any misinformation about costs Mainers pay subsidizing benefits received elsewhere. A third topic that could help drive home the importance of these projects is case

studies on how the growing energy industry in Maine has supported economic development for local communities.

- E. What are the best ways to connect with and include socially vulnerable counties and communities in the energy planning process? “Socially vulnerable counties and communities” are defined in law as “those counties and communities in the State containing populations that are disproportionately burdened by existing social inequities or lack the capacity to withstand new or worsening burdens.”
- a. The [Maine Social Vulnerability Index \(MSVI\)](#) is based on 19 socioeconomic and demographic indicators taken from US Census data. The MSVI is a customized version of the US Centers for Disease Control’s social vulnerability index. Please comment on whether and to what extent DOER should utilize the MSVI to inform engagement with socially vulnerable counties and communities.

N/A

Part 2: Maine’s Energy Landscape

Since the 2025 Energy Plan was released, Maine’s energy landscape has continued to evolve, shaped by market shifts and broader economic conditions, such as changes to state and federal policies, fuel prices, technology adoption, and investment trends. We recognize these changes, and others, have had varying impacts and DOER welcomes input on how these changes should be reflected in the next Energy Plan.

- A. Which market, policy, or economic shifts that have occurred in 2025/2026 do you consider to be the most consequential for energy planning in Maine, and why?

There have been several market, policy, and economic shifts in 2025/2026 – occurring at the global, national, and regional levels – that are consequential for energy planning in Maine.

Globally, trade and traditional wars have introduced uncertainty and volatility into energy markets and supply chains. Nationally, federal energy policy changed course with the new presidential administration, flipping from a pro-renewables paradigm concerned with mitigating the effects of the US energy system on climate change and its resilience thereto, to an administration focused on maximizing the reliability benefits of fossil fuels for baseload generation. At the same time, the new administration has been particularly hostile to offshore wind, for which it has become impossible to secure federal permits. This about face in policy

included a shortening of the qualifying window for developers and investors to capture tax credits for building and producing renewable energy under federal law, removing a powerful incentive underlying renewable portfolio standards. Even with state support, this pivot may discourage or delay renewable supply development in Maine, which is an otherwise attractive location for such growth. Maine will have to consider various scenarios in its energy planning and ways in which it can continue to support such growth in the absence of or delay in federal support. In addition, global and national market trends regarding large loads, particularly AI data centers, have upended load forecasting and prompted regional and local policy shifts to account for increased expected future demand.

The volatility roiling global oil markets has the effect of making it more difficult to make assumptions about the inputs to Maine’s energy planning, not only for fuel prices, but also for solar panels, wind turbines, gas turbines, and transformers, as a result of effects on supply chains. Those disruptions, as well as increased uncertainty in federal policy, raise the cost of capital in addition to the cost of goods. The added challenge of a surge in expected demand growth has prompted ISO-NE to consider fundamental changes to how capacity markets are operated in New England.¹ The Maine legislature responded to this challenge by approving a moratorium on data centers larger than 20 MW, the first statewide ban of its kind in the country,² in order to offer Maine a chance to “absorb and understand the impact of data centers.”³ Though law was vetoed by Governor Mills,⁴ it is clear there is public apprehension about the prospect of these large loads coming to Maine.

To address this apprehension, Maine should develop a sensible, middle-of-the-road path to capture some of the economic benefits of large load growth while offsetting or mitigating rising energy prices across the state’s broader customer base by ensuring these customers pay their fair share of costs. More maximalist policies in either direction, like unfettered access or outright bans, may not offer the most comprehensive benefits to Mainers this moment provides.

¹ ISO New England. *Capacity Auction Reforms Key Project*, www.iso-ne.com/committees/key-projects/capacity-auction-reforms-key-project. Accessed 27 Apr. 2026.

² Budion, Kaitlyn. “Landmark Data Center Moratorium Passes Maine Legislature.” *Maine Morning Star*, 9 Apr. 2026, mainemorningstar.com/2026/04/09/landmark-data-center-moratorium-passes-maine-legislature/.

³ Ibid, Sen. Mark Lawrence.

⁴ Mak, Aaron, and John Hewitt Jones. “Maine Gov. Mills Vetoes Data Center Moratorium Bill.” *Politico*, 24 Apr. 2026, www.politico.com/news/2026/04/24/maine-gov-mills-vetoes-data-center-bill-00891762.

- B. As it relates to Maine, what are the most important near-term impacts of these changes (over the next 1-3 years) that should be addressed through this Energy Plan or planning process?

As it relates to Maine, the most important near-term impacts of these changes are those changes to the load forecast and corresponding transmission and generation needs. The generation mix throughout New England will not be what was anticipated as recently as a year ago, and achieving Maine's clean energy goals will be a challenge, particularly where they rest on high penetration of offshore wind. In adapting to these challenges, Maine should look to strengthen its intra- and interregional ties, both within New England through Longer-Term Transmission Planning and to regions such as Canada, where Maine could tap into the Nova Scotia West Wind offshore wind resource, for example.⁵ Maine's onshore wind resource is increasingly valuable to not only Maine but also to its neighbors in the absence of offshore wind and Maine should consider this intraregional role in its planning.

- C. How are these changes influencing financial decisions related to energy at the household and private sector levels?

These changes have direct impacts on financial decisions related to energy at the household and private sector levels. At the household level, communities have raised concerns about the financial impact of large loads on consumers.⁶ 2024 census data showed that a quarter of Mainers were not able to pay at least one utility bill that year, and a third of households reported cutting back on other necessities, such as food or medicine, to afford their energy bills.⁷ Short-term moratoria can temporarily address these issues, but a better longer-term strategy is to ensure that large loads pay for the costs of the energy infrastructure that they need.

In the private sector, the elimination of tax credits and erratic tariff policies are spooking investors and developers who might otherwise have been willing to take on risk to fund and build infrastructure projects that generally take decades to pay off. The inability to secure federal permits for offshore wind projects for the next several years means that developers and investors are less likely to consider such projects in that time frame.

⁵ Government of Nova Scotia. *Wind West: Canada's First Offshore Wind Development*, novascotia.ca/wind-west/. Accessed 27 Apr. 2026.

⁶ Rupertus, Annie. "Bangor Rushes to Ban Data Centers, Citing Sudden Industry Pressure." *Bangor Daily News*, 6 Apr. 2026, www.bangordailynews.com/2026/04/06/bangor/bangor-government/bangor-data-center-moratorium/.

⁷ Hsie, Francesca, et al. "What's Driving High Electricity Prices in Maine?" *Third Way*, 22 Jan. 2026, www.thirdway.org/blog/whats-driving-high-electricity-prices-in-maine.

- D. How do these changes specifically affect socially vulnerable communities, and what can Maine do to make sure the Energy Plan is designed to benefit everyone?

The combination of forecasted demand growth with constrained supply is creating an affordability challenge in the energy markets broadly. Because demand for household electricity is relatively inelastic, this challenge falls especially hard on socially vulnerable communities who have little recourse in the face of higher energy bills.

At the same time, the White House's budget, released April 3rd, proposes eliminating federal funding for the Low Income Home Energy Assistance Program (LIHEAP),⁸ which would create an additional burden for the most vulnerable communities in Maine. While Congress has historically rejected efforts to cut the program, budgetary constraints do exist and Maine should be prepared to backfill some of that funding through Maine Housing's Home Energy Assistance Program if needed.⁹ Maine's new Plug-in Solar law, LD 1730,¹⁰ can make energy costs more affordable, but this equipment can cost thousands of dollars to purchase and install, and Maine's most vulnerable communities may need assistance to do so.

Last, relevant public engagement is extremely important to ensure Maine's energy plan is designed to benefit everyone. Maine should hold accessible meetings – that is, at times and in places when/where the people you are trying to reach can attend them – in vulnerable communities to hear directly from those communities their concerns and how the Energy Plan can benefit them.

Part 3: Updating the Objectives of the Maine Energy Plan

The 2025 Energy Plan laid out objectives, strategies and actions identified in the prior planning process to responsibly advance Maine's energy system and meet the state's climate and clean energy requirements (see "The 2025 Maine Energy Plan" above).

- A. Are the objectives from the 2025 Energy Plan still relevant? If not, what updates or changes would you suggest?

⁸ Frazin, Rachel. "Trump's New Budget Targets LIHEAP For Elimination." *The Hill*, 3 Apr. 2026, thehill.com/policy/energy-environment/5815067-trump-budget-liheap-energy-prices/.

⁹ "Home Energy Assistance Program." *MaineHousing*, www.mainehousing.org/programs-services/energy/energydetails/liheap. Accessed 27 Apr. 2026.

¹⁰ "An Act Regarding the Beneficial Electrification Policy of the State." *State of Maine Legislature*, www.mainelegislature.org/LawMakerWeb/dockets.asp?ID=280098657. Accessed 27 Apr. 2026.

The objectives from the 2025 Energy Plan are certainly still relevant, and it would be worthwhile to maintain those objectives in the coming Plan to the benefit of all Mainers. Given the challenges that have arisen since the Plan was published, however, new strategies may be needed to achieve them.

- B. What data, underlying assumptions, or analyses from the 2025 Energy Plan should be revised or prioritized in the 2027 plan?

Anything Maine can do to assess multiple pathways towards its goals will be helpful. As the last few years have shown, trends can shift dramatically in a short time, and planners should be prepared for their assumptions to be mistaken. Assessing multiple pathways can allow planners to be more flexible in the way they respond to changing circumstances while remaining firm about their end goals.

Large loads and data centers do not feature in the 2025 Maine Energy Plan, but these are the main drivers of expected load growth and will have effects on Maine's energy system whether they are built in Maine or not. As such, large loads and data centers should be prioritized in the 2027 Plan.

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

Objective A: Deliver Affordable Energy for Maine People and Businesses

Energy costs affect both daily life and the broader economy in Maine. They show up directly in household utility bills; delivered fuels like heating oil, kerosene and propane; transportation fuels; and indirectly in the prices of goods and services that rely on energy for production or delivery. Energy costs also influence the competitiveness of Maine's businesses and industries. In the 2025 Energy Plan, the residential sector was examined using an "energy wallet" analysis, which broke down typical household energy costs and projected future scenarios. Affordability can also be assessed through measures like energy burden—the share of household income spent on energy—or by conducting alternative analyses that explore the specific impacts of varying cost trajectories on Maine's economy.

Objective A includes the following strategies:

- *Reduce Maine's dependence on imported fossil fuels for heating and electricity generation*
- *Reduce energy burden for low- and moderate-income households*
- *Review existing approaches to identify additional electricity cost control opportunities*

Objective A Questions

1. How should the energy plan define energy affordability?

N/A

2. How should the energy plan prioritize energy affordability while also ensuring modern and reliable energy infrastructure and meeting other goals?

Maine can look to large loads as an opportunity to drive the development of modern and reliable energy infrastructure. Those large loads should be required to pay their fair share of costs, with the result that the growth of energy infrastructure will allow for costs to be spread over a larger base, reducing energy costs for Mainers generally.

Maine should also look to select solutions that can solve multiple needs at once, limiting the overall amount of energy infrastructure that needs to be developed. This is congruent with the regional framing described above, in that regional solutions can allow Maine to tap into resources elsewhere in New England, in New York, or in Canada in times of need, as well as to share resources with those regions as Maine expands its own generation supply.

3. What strategies would help ensure energy affordability for households and communities with the highest energy burdens?

N/A

4. What metrics should Maine use to track progress toward delivering affordable energy?

N/A

5. Are there other approaches that Maine should consider to reduce energy costs and price volatility?

N/A

6. Comment on available information, data, or provide feedback on energy supply resources or potential resources in Maine (potential resources include, but are not limited to, onshore wind, solar, biomass, biofuels, delivered fuels, waste-to-energy, energy storage, offshore wind, nuclear, natural gas, hydropower, geothermal, tidal energy, and other innovative technologies). Topics of interest include, but are not limited to:

a) Current/existing resources and operations

- b) Feasibility and opportunities for development of new or expansion of existing resources
- c) Land-use and siting considerations
- d) Technologies and other relevant characteristics that may influence deployment

Diversification of resources is helpful for the reliability and affordability of Maine and the New England region. Maine is fortunate to have the opportunity to site and develop many resource types and it should promote such development not only for its benefit but for that of the region. Maine is also well positioned to diversify via connections to its neighbors. For example, as Nova Scotia or other Canadian provinces explore offshore wind development, Maine could seek further connection to access those resources.

7. Please comment on expected trends for energy demand in Maine.

Though Maine's first priority should be to provide Mainers with a reliable, affordable, and sustainable energy system, the State should also consider its ability to serve energy demand beyond its borders, as demand growth will likely be far greater outside the state than inside. Maine is blessed with abundant natural resources, particularly wind, the unlocking of which would provide tremendous opportunities for economic development through investment into the state, job creation, and a larger tax base. While strengthening its own economic future, Maine can help provide stability to the energy grid throughout the New England region.

Objective B: Ensure Maine's Energy Systems are Reliable and Resilient in the Face of Growing Challenges

Maine's aging electric grid infrastructure continues to face significant pressure from severe storms. As a heavily forested, rural state, Maine's electric transmission and distribution lines have a higher probability of damage from falling trees during wind or ice storms and as a result, Maine experiences more frequent and longer duration power outages than most US states. In 2024, Maine ranked third in the country for the number of total outages as well as the average time customers were without power. In 2023 and 2024, Maine experienced major winter storms that devastated communities across the state, including inflicting significant damage to the electric grid and imposing significant new recovery costs for customers. Maine's reliance on imported fossil fuels for heating and transportation also expose consumers in the state to risks inherent to the supply chain for these energy sources.

Objective B includes the following strategies:

- *Establish ambitious, data-driven targets for energy resilience*
- *Increase coordination and information sharing across energy-related emergency management and resilience entities*
- *Deploy targeted resources to advance innovative and modern resilience solutions including microgrids*
- *Leverage innovative technologies including energy storage to increase resilience and reduce greenhouse gas emissions*
- *Strengthen planning and engagement by utilities to identify and address climate and resilience threats cost-effectively*
- *Advance partnerships and coordination to enhance Maine's energy security and maximize relevant federal and other funding opportunities*

Objective B Questions

1. Please comment on how grid resilience, reliability, and security should be considered in Maine energy planning and how the state should be tracking/considering reliability and resilience in this Plan?

N/A

2. Are there new technologies or innovative solutions to advance reliability and resilience?

Resilience, reliability, and security should be a major consideration in Maine energy planning. Grid-disruptions negatively impact Maine households, businesses, and industry and can be costly. Investment in transmission and distribution is worthwhile for reducing such disruptions and ensuring that other benefits (renewable supply, electrification of heating and transportation) are fully received.

Grid Enhancing Technologies (GETs) such as dynamic line ratings or advanced power flow control can help improve grid resilience, reliability, and security by allowing Maine to get more out of the grid it already has.

As Maine looks to strengthen and expand connections both interstate and interregionally, Maine should consider technology like HVDC, including underground or submarine. HVDC technology can provide a variety of benefits beyond transmission capacity: controllable, bidirectional power flow, supporting blackstart capability, and providing dynamic reactive power support. Dynamic reactive power in particular can support more renewable penetration onto the grid.

3. Please comment on delivered fuel resilience, reliability and security.

N/A

4. Please comment on whether any statutory, regulatory, or policy changes are needed to support access to information about critical energy reliability and resilience topics across and or all energy sectors in Maine.

N/A

5. What emerging risks or resilience challenges should the state consider when planning for energy security, and what general approaches, resources, tools, or technologies may help address challenges and improve information sharing and coordination?

As discussed above, geopolitical uncertainty, challenging federal energy policy, volatile fuel prices, and snarled supply chains all pose risks to Maine's energy security. Interstate and interregional ties can help promote reliability and security, allowing Maine to draw power from other states and regions in times of need. Other states and regions all face those same challenges, however, so Maine should look at efficiency upgrades and building more generation comprised of more diverse resources as well.

Objective C: Responsibly Advance Clean Energy

Maine has a long history of producing energy from clean resources including hydropower, biomass, and wind, and is working to advance those and other clean energy sources to most affordably meet energy needs as well as climate goals and economic development targets. In recent years, hundreds of millions in capital expenditures from the clean energy sector have been invested across the state in the form of new projects and efficiency upgrades, generating significant economic activity in the state and creating new job opportunities. As Maine continues to electrify the heating and transportation sectors and demand for energy grows, it is critical that the state's electricity is increasingly generated by affordable, reliable, homegrown clean energy resources.

Objective C includes the following strategies:

- *Establish a new Clean Energy Standard (CES) to ensure all Maine people have access to cost-effective, reliable, 100 percent clean energy by 2040*
- *Establish a regular schedule of competitive energy purchases*
- *Advance responsible development of offshore wind energy*

- *Advance efficient, necessary infrastructure to modernize Maine's energy systems*
- *Coordinate and collaborate regionally to maximize benefits and achieve shared goals*

Objective C Questions

1. Under law, DOER is required to identify approximate total project award targets for the next 3 competitive solicitations to be conducted by the department pursuant to 35-A M.R.S.A. §10313. Please comment on this requirement including priorities and considerations for the next three competitive solicitations and implementation of §10313.

N/A

2. Under law and through the Maine Offshore Wind Initiative, offshore wind remains an important part of the state and regional long-term energy future. What offshore wind data, research, information, or other considerations should be considered in the development of the energy plan?

N/A

3. Please comment on the feasibility and/or costs of developing advanced nuclear technologies in Maine.

We are supportive of competitive solicitations resulting in long-term contracts for generation resources. Such constructs reduce the risk and ultimately the cost to consumers to procure clean energy. Given the headwinds described above, Maine should consider a flexible approach to resource type and timing. This includes the consideration of developing advanced nuclear technologies for its ability to provide firm, reliable, carbon free baseload power, as well as its potential to drive economic development, tax revenues, jobs, and external investment into the state.

However, Maine will likely face the same headwinds to developing nuclear generation that developers face anywhere: NIMBYism, cost overruns, an inexperienced workforce, and so on. To achieve the development in nuclear in Maine would require a tremendous campaign to educate the public on the safety of nuclear technology and its ability to solve many of Maine's energy challenges. Maine can consider working with other regions undergoing similar initiatives – Ontario, New York – to learn best practices for garnering community support and developing an experienced workforce.

4. Relevant to the energy plan and pursuant to [Resolves 2025, ch. 39](#), DOER is conducting a study, in consultation with other state agencies, evaluating the role of hydroelectric power

generation, pumped hydro storage, and geothermal systems in meeting Maine's energy and climate goals. Please comment on:

- a) Emerging technologies that could safely and effectively improve or expand existing hydroelectric power generation capacity in the state;
- b) Characteristics of locations in the state that might be suitable for pumped storage hydropower system development;
- c) Considerations for developing district geothermal systems on brownfield sites in the state.
- d) Any other initial comments related to the Legislatively directed hydropower and geothermal studies.

N/A

- 5. DOER is required to complete a [2027 Renewable Portfolio Standard \(RPS\) Assessment](#), which is now under development. Are there any specific priorities or considerations that are relevant to the Energy Plan development as it relates to Maine's existing RPS study or resources eligible under Maine's existing RPS and complementary Clean Energy Standard (CES)?

N/A

- 6. Please comment on how to address financial barriers to clean energy deployment. What financial tools would aid in greater deployment of small or large-scale energy generation resources?

As mentioned above, state-run procurements that result in long-term contracts are a supportive financial tool to aid large-scale generation. The certainty that a long-term contract provides reduces risk and enables developers to secure better project financing, both of which ultimately reduce the cost of such generation to consumers. The Northern Maine RFP is a good example of a procurement that the state is undertaking and could repeat. This RFP importantly considers the necessary transmission to support the large-scale generation. Interconnection costs, especially for remotely located resources, can be prohibitive for generation developers. By similarly procuring transmission with a contract or via ISO-NE planning processes, generation can be more certain of its pathway to market.

Further support for programs such as the Efficiency Maine Green Bank, which is designed to pull private capital into market gaps for energy efficiency and clean energy equipment and services, could also be helpful in this regard. By the same logic supporting the Green Bank's

current initiatives, expanding its remit to include small or large-scale energy generation resources could aid in drawing in private capital to support those initiatives as well.

Above all, regulatory certainty – especially in the form of fair, consistent, and efficient permitting – is key to drawing investment to deploy clean energy.

7. Please comment on transmission and distribution capacity and infrastructure needs to facilitate deployment of new energy resources.

The Maine – New Hampshire Longer-Term Transmission project solicited by ISO-NE and the Northern Maine transmission project solicited by the PUC as part of the Northern Maine Renewable Energy Development Program are key infrastructure needs to facilitate the development of new energy resources. As described above, interconnection costs and the ability to supply load can be a deterrent to new energy resource development. The proactive or simultaneous build out of transmission to support new energy resources is key to preparing the grid.

Objective D: Deploy Efficient Technologies to Reduce Energy Costs

Energy efficiency – using less energy to achieve the same result – helps lower energy costs across Maine’s economy. Energy efficiency can be realized through a range of technologies and other practices. Increasing electrification substantially increases efficiency – in fact, by 2050 widespread electrification could enable Maine to reduce the overall amount of energy needed while growing its economy. Expanding electrification with modern technologies also increases the availability of load flexibility resources. Because the electricity grid is built to accommodate the times of greatest demand, there is potential for significant cost savings for all electricity customers when peaks can be moderated and lower-cost, abundant energy sources can be maximized.

Objective D includes the following strategies:

- *Advance beneficial electrification and weatherization to reduce energy costs and increase overall grid efficiency*
- *Leverage electrified technologies to unlock grid benefits for consumers*
- *Expand Maine’s electric vehicle (EV) charging network*

Objective D Questions

1. Please comment on any opportunities for increased energy efficiency in any sector in Maine, including opportunities to advance specific technologies (ie: weatherization, wood heat, combined heat and power, heat pumps, etc.) or associated policies. N/A

2. Comment on opportunities to increase the efficient utilization of the electric grid.

Grid enhancing technologies, such as dynamic line ratings or advanced power flow control, can help Maine make the most of the grid it already has. Reconductoring can increase capacity on the grid while limiting the amount of new infrastructure that needs to be built. As described in Objective D, the grid is built to meet peak demand: any opportunities to reduce peak demand and spread load to other hours increase the efficient utilization of the electric grid. Energy efficiency programs as well as further utilization of time-of-use rates can promote this load shift.

3. Comment on opportunities to expand load flexibility resources, particularly through voluntary consumer-enabled mechanisms.

See above

4. Comment on opportunities to cost-effectively expand Maine's EV charging network as well as other clean or more efficient transportation technologies.

Maine should continue prioritizing weatherization paired with heat pump deployment, especially in oil-heated homes and mobile homes, rather than treating them as separate programs; a centered approach as opposed to individual programs. Efficiency Maine's latest triennial (April 2025) plan shows this pairing delivers system-wide savings, including lower wholesale energy costs for all ratepayers.

As ISO New England projects winter peak demand to overtake summer peaks due to heating electrification, prioritizing smart controls, load management (DSM), and time-varying rates for heat pumps and water heaters can aid in controlling future capacity and transmission costs. Most EV charging happens at home or work; unmanaged charging potentially creates or contributes to new coincident peaks. Given ISO-NE expects transportation electrification to be a major long-term load driver, expanding managed EV charging, especially fleet charging, can capture transportation electrification benefits while avoiding new peak demands, aligning customer savings with regional grid efficiency.

Objective E: Expand Clean Energy Career Opportunities for Maine People and Advance Innovation

In 2024, there were approximately 27,500 workers in Maine's energy industry, including approximately 16,200 clean energy workers and 11,400 traditional energy workers. Today, Maine's clean energy sector alone contributes \$3 billion to the state's economy annually. As Maine's energy sectors continue to grow and change, investing in job training and innovation will be critical to sustaining this momentum. Expanding workforce development helps ensure that Maine people can access good-paying jobs while meeting rising demand in the industry. At the same time, supporting innovation and entrepreneurship can further strengthen economic growth, encourage locally driven solutions, and leverage Maine's natural and economic resources. Together, these efforts position the state to capture long-term economic, environmental, and community benefits from the clean energy transition.

Objective E includes the following strategies:

- Raise awareness of clean energy careers and connect employers to the local workforce*
- Advance clean energy curricula development, technical training, and experiential learning*
- Coordinate with educational institutions, technical and vocational training centers, labor unions, and employers to expand and promote clean energy career pathways*
- Expand pilot programs, technical assistance, and funding for clean energy innovation and foster partnerships with research, education, and innovation institutions and the private sector to advance clean energy innovation*

Objective E Questions

1. Please comment on workforce trends, needs, and priorities for Maine's energy workforce, including new opportunities for Maine to lead.

Nationwide, there is a shortage of electrical workers which will only be exacerbated by the forecasted increase in load.¹¹ This creates an opportunity for Maine to invest in its clean energy workforce through trade schools, jobs programs, and upskilling curricula. An example can be found in New York, where Governor Hochul recently announced the expansion of the state's clean energy workforce commitment with \$50 million in new funding as part of its Clean Energy Career

¹¹https://static.googleusercontent.com/media/publicpolicy.google/en//resources/powering_new_era_of_american_innovation.pdf

Pathways Training and Technical Skills Training and Upskilling programs.¹² With Maine's natural resources it is well positioned to continue building a clean energy workforce to develop resources to serve not only Maine but the New England region. Maine stands to benefit economically in its role as an energy exporter.

2. Please comment on how the energy plan should consider job quality or other considerations as it relates to growing Maine's economy and supporting family-sustaining careers.

N/A

3. Please comment on the role of energy in advancing economic development goals for the state and communities.

Energy is a baseline requirement for thriving communities and economic development. Blackouts, system unreliability, and unaffordability have disparately negative impacts on socially vulnerable people, families, and communities, for whom energy makes up a proportionally larger portion of their budgets and have fewer alternatives or opportunities to change their circumstances by moving or investing in energy efficiency, be it buy insulating their homes, buying an EV, or installing heat pumps. Thus, Maine energy policy should be focused on meeting Mainers where they are, literally, to allow them to thrive and raise families in their homes and communities.

4. Please comment on programs, tools, or resources that would support investment in the clean energy economy in Maine.

N/A

5. Please comment on programs, tools, or resources that would support workers in the traditional energy sectors, including fuel delivery.

¹² <https://www.nyserda.ny.gov/About/Newsroom/2026-Announcements/2026-04-02-Governor-Hochul-Expands-Clean-Energy-Workforce-Commitment-With-50-Million-New-Funding>

Besides training, a major barrier for many workers is childcare. A program to offer stipends or stand up affordable and reliable childcare would go a long way in supporting workers across Maine's economy, including those in traditional energy sectors.

6. Please comment on climate and clean energy innovation and the needs of the state.

Maine needs a flexible electric grid to support innovation and the future demand of the state. Bidirectional electric transmissibility, storage at scale for onshore wind, increased transmission reliability and capacity are all needed to shield Maine from the worst effects of climate change and catalyze economic development in the state.

7. Please comment on programs, tools, or resources that would support research, development, and demonstration of innovative energy technologies and projects.

Maine should seek to partner with institutions already engaged in research, development, and demonstration of innovative energy technologies and projects. Greentown Labs, for example, is a local New England leader in climate-tech innovation and would be an excellent partner for the State in developing and deploying innovative energy technologies and projects. At the same time, this sort of partner could help incubate local Maine startups to develop these technologies right at home and strengthen local economies.

8. Please comment on necessary trainings, education, or other information that should be considered for future Clean Energy Partnership programming.

N/A

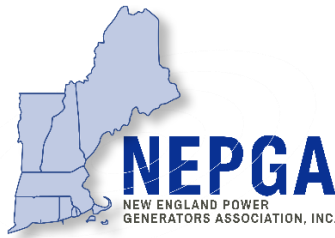
Part 5: Additional Considerations

1. Are there any other considerations related to the statutory requirements of the Maine Energy Plan that should be taken into account as the 2027 plan is developed?

N/A

2. Please provide additional insights, perspectives, or examples you wish to share.

N/A



Maine Department of Energy Resources
Re: 2027 Maine Energy Plan
April 17, 2026

The New England Power Generators Association (NEPGA)¹ appreciates the opportunity to provide written comments to the Department of Energy Resource's (DOER) regarding its 2027 Maine Energy Plan. The 2027 Maine Energy Plan comes at a time of both ever-increasing sensitivity to cost and reliability and increasing difficulty in constructing new generating facilities. And yet, the Maine and New England power generation fleet has demonstrated tremendous resilience in delivering reliable services this past year in some of the most challenging operating conditions in decades.

New England's electric grid remains reliable, but increasingly under strain. In the last year alone, the region has weathered two extreme events that underscored the necessity of every single generating facility on the grid.

In the summer of 2025, New England saw the highest demand for electricity since 2013 and the highest temperature in June across the Northeast in history. It was also the first time the region exceeded ISO New England's extreme conditions forecast in more than 20 years, and the grid operator reached deeply into reserves to maintain reliability. More recently, the winter of 2025/2026 was the coldest New England has experienced in 20 years, resulting in the highest electricity demand in 11 years. Unlike during the summer's heatwave, the ISO managed not to dip into emergency reserves, but timely replenishment of LNG and fuel oil was essential to maintaining reliable operations. The reliable operation of the grid through the cold snap and blizzard was a result of unprecedented coordination and communication across generators, utilities, and federal and state officials.²

Past performance, however, is not a guarantee for the future. With slowly growing electricity demand and stagnant development of new generation, New England cannot afford to allow any more generating capacity to retire. NEPGA therefore urges DOER to prioritize policies that support the continued, efficient operation of competitive power markets and avoid policies that would hasten the premature retirement of resources. Competitive generators stand ready to continue to make the investment to support consumers' electricity needs, but that requires stable and sustainable wholesale electricity markets and state policies.

As New England's trade association representing the region's competitive electricity generating companies, NEPGA brings a unique perspective and expertise on energy matters. Across New England, NEPGA's member companies own or operate approximately 27,000 MW of generating capacity, well over 90% of the region's installed generating capacity. In Maine, NEPGA members own and operate more than 3,600 MW of generation, about 30% of them low-carbon.

¹ The comments expressed herein represent those of NEPGA as an organization, but not necessarily those of any particular member.

² Sources: <https://www.cbsnews.com/boston/news/boston-heat-wave-warning-weather-temperatures/> and <https://isonewswire.com/2025/07/02/grid-remains-reliable-as-june-heat-wave-brings-highest-peak-in-over-a-decade>

In many respects, NEPGA's member companies are the state's largest manufacturers, reliably producing a vital commodity from a broad mix of resources and technologies, including natural gas, oil, hydro, wind, and solar. Our members are an economic powerhouse in Maine, providing: Approximately 450 full-time jobs with an average compensation of \$89,000 annually; about \$412 million in direct economic activity to the state's economy; and roughly \$142 million annually in state, local, and federal taxes.

The vast majority of this economic activity depends on the wholesale regional electricity markets operated by ISO New England.

For more than 25 years, Maine has relied on the ISO's competitive wholesale electricity markets to produce a reliable supply of electricity at least cost. Market forces drive innovation and efficiencies, providing considerable value to the state's consumers and supporting a thriving economy.³

Since utility divestment, plant efficiencies have increased by more than 20%, reducing the need for more facilities and consistently driving down the cost to generate each megawatt of electricity that is necessary for reliability. The result: Overall trendlines for the cost of generating electricity have consistently declined.

The competitive markets have also ensured more than enough electricity supplies to meet *future* demand needs, with roughly 10,000 MW of additional generation built at historically low prices, almost entirely financed through the competitive market.⁴

The goal of restructuring was to end the cycle of cost over-runs and inefficient operations that plagued utility ownership of power plants, and NEPGA urges the state to continue to reject misguided suggestions to allow utilities to get back into the business of owning and operating generating facilities, including energy storage. Doing so will not lower costs or speed up construction timelines; instead, it will move the risks of cost overruns and construction delays from private investors to captive consumers. Maine should keep the financing, building, operating and maintaining of generation and storage with the businesses experienced with developing such resources in the competitive market.

Competition has also yielded tremendous environmental benefits, helping cut GHG emissions in Maine and the region. Since 1990, power plants in New England have reduced emissions by 50% — the most of any sector of the economy over the same period, according to the U.S. Energy Information Agency.⁵

As DOER works on the 2027 Maine Energy Plan, NEPGA encourages the state to consider slowing its pace on policies that are well-intentioned but ultimately harm the efficacy of the wholesale markets that the power generators needed for reliability depend on.

When the 2025 Energy Plan was written, state policies, not only in Maine but across New England, were prioritizing out-of-market contracts for preferred policy resources, leaving all the other generating facilities — including existing renewable and nuclear resources — to recover their costs in the wholesale markets. Because of changes in federal administration and

³ Recent analysis by Energy Tariff Experts found that, adjusting for inflation, supply was not a driver of electric bill changes in Maine. See Energy Tariff Experts Roundtable Presentation at slide 5 ([Microsoft PowerPoint - ETE Roundtable Slides_03182026.pptx](#)).

⁴ <https://www.iso-ne.com/about/key-stats/markets#fcaresults>

⁵ <https://www.eia.gov/environment/emissions/state/>

economy-wide challenges, federal support for such projects has lessened, permitting challenges have increased, and various economic headwinds have remained strong.

It is clear that the big bets the New England states made on clean energy are not showing up today at the scale that was expected, and there's no easy solution – political or economic. This overall gridlock hits at an inopportune moment, when electricity demand has begun to tick up after 25 years of seeing declines. But even if demand weren't increasing, New England's electric grid is increasingly tight at times of [severe weather](#), which is making energy prices ever-more volatile and drawing the attention of the public and policymakers.

Across the country, NEPGA's members have [been investing billions](#) in energy infrastructure, from Maryland and Pennsylvania to South Dakota and Hawaii. But here in New England, they have been caught between sometimes conflicting state and federal policies at the same time they have seen years of record-low prices in the wholesale markets.

The 2027 Maine Energy Plan should approach new generation (and storage) as a complement to existing resources, not as a replacement for them. At this time of rising demand, New England simply cannot allow more of its existing facilities to retire without undermining reliability and affordability. It will be necessary to support reinvestment in the facilities that have kept the lights on through this coldest winter in a decade and last summer's heat waves. Those plants will be needed for years. In fact, most of them will likely be needed for decades to come.

NEPGA encourages DOER to find ways reduce uncertainty — and therefore risk — for those who might invest in the state. That includes not only investment in new resources, but in those already here, *i.e.*, the approximately 3,600 MW of generating capacity installed in the state. NEPGA urges DOER to review the state's role in the permitting and licensing renewal of existing facilities. That review should identify pathways to better align Maine's energy objectives and enable decisions impacting the continued operations of Maine-based resources. Are there ways to de-risk the state-run processes such resources would undergo if looking to expand at an existing facility, or to make even better use of the existing footprint? Could DOER find ways for the state to reduce the cost, complexity, and timeline of permitting decisions?

Clean energy investments will surely continue across New England, but achieving policy objectives will require flexibility in permitting and ongoing operations to balance this industry's favorite metaphor – the three-legged stool of affordability, reliability, and clean.

Again, NEPGA appreciates this opportunity to provide input as DOER works on the 2027 Maine Energy Plan.

Sincerely,

Molly Connors
Policy Analyst-Manager



April 27, 2026

Submitted via email: doer@maine.gov

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

Re: Natural Resources Council of Maine response to 2027 Maine Energy Plan Request for Information (RFI)

Thank you for the opportunity to provide input into the development of the 2027 Maine Energy Plan (energy plan).

This planning process is coming at a pivotal time. All at once we are experiencing the dual forces of rapid clean energy technology development and deployment, and high energy prices and instability due to our reliance on the old fossil-fuel based system. Maine's ambitious actions in support of building more locally produced clean energy, which have the multiple benefits of reducing pollution, reducing exposure to volatile fossil fuel prices, and supporting new jobs and economic development seem more prescient than ever.

Due to the breadth and number of the questions asked in the RFI, this comment will not address all of the questions comprehensively, but will note the questions we are specifically responding to.

We look forward to engaging with the Department of Energy Resources (DOER) throughout this important process.

Responses to RFI questions

Part 1: Engaging in Maine's Energy Plan

A. What recommendations do you have regarding the best ways to engage and solicit feedback from the public throughout the energy planning process in calendar year 2026?

We suggest reaching out through the MaineCAN network – a network of members of local and municipal energy and sustainability committees – to gather feedback.

D. Are there specific topics that you would most like to see covered in public meetings or workshops?

We suggest a session on how Maine can reach its goal of achieving 100% clean energy by 2040 given the change in the federal policy landscape, including through state policy options and regional collaboration. Additionally we suggest a session on the opportunity for how coordinated behind the meter (BTM) technologies like EVs, heat pumps, plug-in solar, and distributed batteries can reduce costs for individuals and families while contributing to greater grid utilization and reliability.

E. What are the best ways to connect with and include socially vulnerable counties and communities in the energy planning process?

We suggest direct, and where possible in-person conversations with tribal governments and tribal members from each of the four federally recognized tribes in five communities in Maine, as well as the Wabanaki Sustainable Energy Team (through the Mitchell Center at UMaine Orono), on topics including tribal energy sovereignty, tribal participation and ownership in clean energy projects, and shared goals of addressing climate change and ensuring energy affordability.

Part 2: Maine's Energy Landscape

A. Which market, policy, or economic shifts that have occurred in 2025/2026 do you consider to be the most consequential for energy planning in Maine, and why?

There have been many significant shift that should inform the energy plan, including the global energy crisis precipitated by the war in Iran and the closing of the strait of Hormuz, the Trump Administration's attacks on offshore wind, changes to Maine's Net Energy Billing program, and continued cost reductions in key clean energy technologies.

The 2026 war in Iran, has resulted in the weeks long closure of the straight of Hormuz, a shipping lane through which travels a significant portion of the world's oil and liquified natural gas (LNG) supplies, as well as other commodities. While this geopolitical event is still unfolding, it has had a major impact on global fossil fuel markets, directly impacting Mainers. Prices for gasoline, diesel have jumped up, and while warmer weather has lessened the impact for now, prices for heating oil has risen as well. Brown University researchers have calculated that as of Friday April 24, 2026, Mainers have spent an additional \$58M on gasoline alone due to global oil market spikes.¹ This event has reinforced the economic imperative of reducing our dependence on imported fuels, and speeding the deployment of clean energy technologies.

Related to offshore wind, since 2025, there is an increasing amount of data available on the real-world operational characteristics of offshore wind in the Northeast. Data from South Fork project in New York and Vineyard Wind in Massachusetts corroborate that offshore wind complements solar power in a diverse and clean energy supply,² as well as providing reliable power during winter cold snaps.³

Further, despite the hostility of the Trump Administration to offshore wind, more than 9 gigawatts (GW) of offshore wind was installed around the world in 2025, suggesting that the industry will continue to mature and develop.⁴ This is especially likely in the wake of the disruption in global energy markets due to the war in Iran. Nearby in Nova Scotia, the provincial government has initiated a process to procure as much as 5 GW of offshore wind power.⁵ All of these developments should bolster Maine's long-term commitment to offshore wind as a major component of our future clean energy supply and economic development.

¹ Brown University. *Iran War Energy Cost Tracker*. <https://iranwarcost.watson.brown.edu/>. Accessed 4/24/26.

² Orsted. *One year of South Fork Wind*. <https://us.orsted.com/renewable-energy-solutions/offshore-wind/south-fork-wind-report>. September 2025.

³ Acadia Center. *Grid Action Report: Winter Coldsnap*. <https://acadiacenter.org/resource/grid-action-report-winter-coldsnap/>. February 2026.

⁴ Global Wind Energy Council. *Global Wind Report 2026*. <https://www.gwec.net/reports/globalwindreport>. April 2026.

⁵ Government of Canada; Government of Nova Scotia. *Offshore Wind Strategic Direction Letter*. <https://cdn.cnsoer.ca/sites/default/files/2025-09/Offshore%20Wind%20Strategic%20Direction%20Letter%20-%20Sept%2018%202025.pdf>. September 2025.

LD 1777 made significant retroactive changes to Maine's Net Energy Billing program, leading to lawsuits, and damaging investor confidence in Maine as a safe state for clean energy investments. The energy plan should address ways in which Maine can send signals to rebuild the conditions necessary to bring needed clean energy investments and the associated emissions reductions and economic and jobs opportunities to Maine.

Finally, clean energy technologies and demand management policies continue to be the fastest and cheapest new energy resources to bring onto the grid, with continued progress being made as we speak. As just one example, globally in 2025, battery pack prices for stationary storage applications – critical for operating a 100% clean energy system – fell to a record low of \$70/kWh in 2025, a 45% drop from 2024.⁶

B. As it relates to Maine, what are the most important near-term impacts of these changes (over the next 1-3 years) that should be addressed through this Energy Plan or planning process?

Based on the clear and present threat to Maine's economy from fossil fuel dependence (in addition to the threat of increased climate damages), and the proven opportunity for clean energy to contribute to energy and economic security and economic growth, the energy plan should include robust modeling to update existing scenarios and provide new ways for Maine to achieve its emissions reduction and clean energy goals.

C. How are these changes influencing financial decisions related to energy at the household and private sector levels?

At the household level, high energy costs caused by fossil fuel dependence, whether due to volatile gasoline prices for example as mentioned above, or high electricity prices driven by New England's overreliance on natural gas generation,⁷ are exacerbating the challenge of shifting to cost-saving clean energy technologies.

⁶ Ember. *Global Electricity Review 2026*. <https://ember-energy.org/latest-insights/global-electricity-review-2026/>. April 2026.

⁷ Brattle. *Factors Driving Electricity Prices in Maine*. <https://www.maine.gov/energy/sites/maine.gov.energy/files/2026-02/Factors%20Driving%20Electricity%20Prices%20in%20Maine%20Feb%202026%20Brattle%20for%20DOER.pdf>. February 2026.

Clean energy technologies can save families and businesses significant amounts of money. It costs less to heat with a heat pump than with oil or propane.⁸ Driving an electric vehicle could save drivers more than \$1,500 annually in lower fuel and maintenance costs.⁹ Rooftop solar saves families on their electric bills, and reduces strain on grid infrastructure and expensive peak electricity supply.

But all of these technologies require spending money up front, more challenging when existing energy costs are high, and inflation is being driven by high fossil fuel prices driven in turn by global market instability. Time-of-use rate design and other demand management pricing can save households money by encouraging consumers to use electricity at less expensive times of the day and may only require minimal efforts or expenditures to change energy use and consumer behavior. Given high prices, there may be growing interest and willingness to adopt alternative rates as a way to save money.

D. How do these changes specifically affect socially vulnerable communities, and what can Maine do to make sure the Energy Plan is designed to benefit everyone?

High prices for energy are cumulative with other cost of living challenges, including transportation burdens, inflation, and high housing costs. The energy plan can specifically include strategies underneath the plans' objectives prioritizing the inclusion and consideration of low- and moderate-income households.

Part 3: Updating the Objectives of the Maine Energy Plan

A. Are the objectives from the 2025 Energy Plan still relevant? If not, what updates or changes would you suggest?

All of the objectives are still relevant. While, as mentioned above, there have been significant developments in the energy landscape in the past few years, the fundamentals are the same. First, climate change remains an urgent near-term and long-term threat to Maine's people, communities, economy, and environment. Second, energy is fundamental to Maine's economy, Mainers' household budgets. Third, dependence on importing billions of dollars of fossil fuels with prices driven by volatile global markets every year is a burden on Maine's economy. And fourth,

⁸ Efficiency Maine Trust. *Residential Heating System Cost Calculator*. <https://www.energymaine.com/at-home/heating-cost-comparison/>. Accessed 4/24/26.

⁹ Coltura. *EV Cost Savings Index*. <https://data.coltura.org/ev-savings-index>. Accessed 4/24/26.

the growing clean energy sector is a major opportunity to create jobs and economic opportunity. Building more clean energy resources in Maine is an opportunity to address all of the above.

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

Objective A: Deliver Affordable Energy for Maine People and Businesses

2. How should the energy plan prioritize energy affordability while also ensuring modern and reliable energy infrastructure and meeting other goals?

The plan should consider opportunities for lowering costs through public financing – for example through revenue bonding – and/or ownership of energy assets, including transmission, distribution, generation, and storage. The fundamental advantage of clean energy over fossil fuels is that there are no daily, weekly, or monthly fuel costs associated with power production. But the flip side of the low-operating cost advantage is that most costs come up front, making lower-cost financing extremely important. Public financing or ownership could reduce financing costs and risks for project development, with significant potential benefits for affordability.

The plan should consider recommendations related to aligning Maine’s investor-owned utilities’ rates of return on equity (ROE) with levels no higher than necessary to attract investment. Currently, 14.2% of the average CMP customers’ utility bill goes to shareholder profits, or \$24 of the average \$168 household monthly bill.¹⁰ There is a growing body of evidence that utility ROEs are higher than they need to be to attract investment capital,¹¹ and lead to biases towards capital spending and collecting excess profits from consumers.¹² In a related recent case, the Federal Energy Regulatory Commission (FERC) ruled that New England transmission companies have been benefiting from inflated ROEs for more than a decade and

¹⁰ Energy and Policy Institute. Utility Profit Tracker. <https://energyandpolicy.org/utilityprofittracker/?utility=central-maine-power&bill=162>. Accessed April 26, 2026.

¹¹ American Economic Liberties Project. *Rate of Return Equals Cost of Capital: A Simple, Fair Formula to Stop Investor-Owned Utilities From Overcharging the Public*. <https://www.economicliberties.us/wp-content/uploads/2025/01/20250102-aelp-ror-v5.pdf>. January 2025.

¹² Werner and Jarvis. *Rate of Return Regulation Revisited*. <https://haas.berkeley.edu/wp-content/uploads/archive/WP329.pdf>. March 2025.

must refund up to \$1.5 billion to their customers.¹³ A recent analysis in New York found that reducing utility ROE by just one percentage point would save utility customers between \$142-162 over four years.¹⁴

While it could be seen as somewhat outside the scope of the energy plan, investing in transportation options that don't require the use of personal vehicles is an essential energy affordability strategy. Owning and operating a personal vehicle in Maine costs more than \$12,000 a year – mostly in fuel costs -- which is around 17% of the median income in Maine.¹⁵ Reducing the need to drive and pay for fuel by investing in viable alternatives would help alleviate Maine's high energy burdens, particularly for low-income Mainers.

3. What strategies would help ensure energy affordability for households and communities with the highest energy burdens?

While there are many, one important strategy the plan should include is how to support tribal energy sovereignty, including equity investment in and ownership of clean energy projects by tribal nations in Maine. A detailed set of recommendations in this area could have the inherent benefit of bolstering tribal sovereignty and economic development, as well as potentially bringing additional federal resources to Maine.

6. Comment on available information, data, or provide feedback on energy supply resources or potential resources in Maine (potential resources include, but are not limited to, onshore wind, solar, biomass, biofuels, delivered fuels, waste-to-energy, energy storage, offshore wind, nuclear, natural gas, hydropower, geothermal, tidal energy, and other innovative technologies). Topics of interest include, but are not limited to:

a. Current/existing resources and operations

¹³ Maine Office of the Public Advocate. *Maine Office of the Public Advocate Applauds FERC Decision Lowering Transmission Costs for New England Ratepayers*. <https://www.maine.gov/meopa/about/news/maine-office-public-advocate-applauds-ferc-decision-lowering-transmission-costs-new>. March 2026.

¹⁴ Synapse Energy Economics. *Making Energy More Affordable in New York*. <https://www.synapse-energy.com/sites/default/files/Making%20Energy%20More%20Affordable%20in%20New%20York%2025-099.pdf>. March 2026.

¹⁵ American Automobile Association (AAA). *The Price of New Car Ownership Continues to Climb*. <https://newsroom.aaa.com/2024/09/aaa-your-driving-costs-the-price-of-new-car-ownership-continues-to-climb/>. September 2024.

- b. Feasibility and opportunities for development of new or expansion of existing resources*
- c. Land-use and siting considerations*
- d. Technologies and other relevant characteristics that may influence deployment*

Onshore wind resources in Northern Maine hold the greatest medium-term potential for adding large-scale renewable resources to Maine’s energy supply. The current procurement effort, if successful, will bring as much as 1,200 MW of capacity to the New England grid.¹⁶ As noted below, this could result in significant economic benefits. In addition, these projects could result in annual regional emissions reductions of more than 1.6M tons of carbon emissions, and savings to Maine electricity customers of \$35M per year.¹⁷ The related LTTP procurement being conducted by ISO-NE is also essential for the Northern Maine projects to be successful, as well as opening up opportunities for additional renewable energy to be developed in Maine. For these projects to be successful, significant public support and outreach will be necessary. The plan should consider recommendations for how DOER can play a leadership role in building relationships with communities, stakeholders, and tribal nations with interests in these projects.

Several energy resources mentioned have significant drawbacks that should be considered in the plan. While biomass power generation can provide a market for low-grade wood from the logging industry, if scaled it could result in increased timber harvests, increasing emissions. Further, direct emissions from burning wood for electricity are in some cases higher than coal, with forest regeneration periods decades in the future, outside the scope of Maine’s climate goals. Waste-to-energy is also not a renewable resource, assuming as it does that our society will continue to generate high levels of combustible waste into the future, contrary to our state’s waste-reduction goals.

Objective B: Ensure Maine’s Energy Systems are Reliable and Resilient in the Face of Growing Challenges

¹⁶ Maine Public Utilities Commission. Request for Proposals for Renewable Energy Generation and Transmission Projects Pursuant to the Northern Maine Renewable Energy Development Program. <https://www.maine.gov/mpuc/regulated-utilities/electricity/rfp-awarded-contracts/2025-00361>. Accessed April 26, 2026.

¹⁷ Daymark Energy Advisors. Market and Environmental Benefits of New England Renewable Generation. https://cleanpower.org/wp-content/uploads/gateway/2022/12/ACP_Daymark_MarketEnv_Benefits_Final_Public.pdf. December 2022.

5. What emerging risks or resilience challenges should the state consider when planning for energy security, and what general approaches, resources, tools, or technologies may help address challenges and improve information sharing and coordination?

The plan should include significant consideration of the risks inherent in fossil fuel price volatility across the energy system, including home heating, transportation, and power generation.

Objective C: Responsibly Advance Clean Energy

2. Under law and through the Maine Offshore Wind Initiative, offshore wind remains an important part of the state and regional long-term energy future. What offshore wind data, research, information, or other considerations should be considered in the development of the energy plan?

As noted above, offshore wind is growing around the world, and remains Maine's largest and most abundant clean energy resource. Including through the Maine Offshore Wind Research Consortium, additional data and research on the real-world operation of floating offshore wind turbines in the Gulf of Maine should be gathered – for example, through the operation of the University of Maine's prototype turbine in Castine. This research can narrow uncertainties and reveal mitigation actions for potential impacts in benthic and pelagic environments, for bird and bat species, marine mammals, and other surrounding issues like secondary entanglement or impacts from power transmission cables. Continued public education would also be helpful in reducing the impact of misinformation, for example, by increasing public awareness that any commercial offshore wind project in the Gulf of Maine will be located outside the footprint of Maine's lobster industry (LMA1).

As noted below in this comment, offshore wind holds tremendous economic development opportunities for Maine in addition to its climate and energy benefits. To this end, the 2027 Energy Plan should outline near-term steps to lay the groundwork for the development of an offshore wind port in Searsport. While there is currently no active port proposal, and it is unlikely federal funding to support the development of the project would be available before 2029, there are important activities that can be undertaken in the near-term to ensure any port project that is

developed has benefits to, and support from, surrounding communities. For example, in addition to the above-mentioned economic impact assessment, the state could pursue activities to engage the community around the changes that a port facility could bring, mapping assets and community needs, identifying community priorities, building capacity around economic development opportunities that would flow from port construction investments, workforce pathways for local community members, etc. These economic development and community engagement best practices are best conducted now, and will be important regardless of the final site of the port facility.

3. Please comment on the feasibility and/or costs of developing advanced nuclear technologies in Maine.

New nuclear technologies should be approached with caution given the high cost, feasibility in Maine, and issues around waste management and public acceptance. Many economic considerations are referenced in NRCM's testimony on legislation related to nuclear power that was introduced in the 132nd legislature.¹⁸

Consideration of new nuclear facilities in Maine should be done in comparison to alternatives, especially on cost. Challenges around public acceptance and siting, Maine's referendum requirement, waste disposal options, and security and proliferation risks should also be considered when compared to other alternatives.

6. Please comment on how to address financial barriers to clean energy deployment. What financial tools would aid in greater deployment of small or large-scale energy generation resources?

The plan should include recommendations for the creation of a front-of-meter (FTM) distributed generation (DG) successor program, that pursues and prioritizes low- and moderate-income customer and tribal participation and benefits. The plan should also include recommendations for how the Efficiency Maine Green Bank can provide financing for income-eligible renewable energy programs.

7. Please comment on transmission and distribution capacity and infrastructure needs to facilitate deployment of new energy resources.

¹⁸ Natural Resources Council of Maine. Combined testimony on LDs 342, 343, and 601. <https://www.nrcm.org/wp-content/uploads/2025/03/LDs-342-343-601-nuclear.pdf>. March 2025.

Many critical barriers holding back clean energy resources are regulatory. Maine needs transparency and consensus around the existing capabilities and functionality of the transmission and distribution systems, utility modeling and planning standards and assumptions, and the operational, managerial, and legal upgrades required to enable the deployment of new energy resources and increasing the flexibility of new and existing resources. The plan should focus significantly on recommendations to overcome information asymmetry and misaligned incentives.

The plan should also consider recommendations related to how Maine can undertake, or participate in long-term state, regional, and interregional transmission planning to facilitate increasing renewable energy development, lowering costs, and reducing emissions.

Objective D: Deploy Efficient Technologies to Reduce Energy Costs

We offer two overarching comments regarding this objective that apply more broadly than any of the questions below. Generally, we recommend adding a strategy focused on establishing an enabling utility regulatory environment. More specifically, a major and common underlying barrier for progress on the below questions are issues related to the New England Independent System Operator (ISO-NE) and utilities' metering, billing, and settlement systems. An effective state strategy focused on these issues is critical to unlocking the benefits of demand-side resources to create and distribute value related to capacity, load shifting, aggregation, and the economic signals and incentives required to scale these opportunities.

1. Please comment on any opportunities for increased energy efficiency in any sector in Maine, including opportunities to advance specific technologies (ie: weatherization, wood heat, combined heat and power, heat pumps, etc.) or associated policies.

The energy plan should consider innovative program designs to lower barriers to adopting clean energy technologies, which could include community-based bulk equipment purchases, targeted energy efficiency or electrification investments based on grid location, capacity, or opportunity for avoided costs, or scaling up bundled programs for low- and moderate-income customers.

2. Comment on opportunities to increase the efficient utilization of the electric grid.

The plan should consider establishing a grid utilization standard as part of a package of performance measures or requirements for Maine's utilities. Currently, the utility regulatory structure incentivizes capital investments, largely to meet moments of peak demand, resulting in expensive grid infrastructure being unused for significant percentages of time. Correcting those incentives would get more out of the grid we have, rather than incurring additional costs that drive rates higher.

Increasing uptake of time-of-use (TOU) rates is also a massive opportunity. Simply providing economic incentives to shift demand can lower peak loads. This can save customers money, while also creating large potential savings in transmission, distribution, and energy supply costs.¹⁹ The energy plan should consider opt-out TOU rates, high enrollment targets, and allowing competitive energy suppliers to offer TOU rates, potentially through pilot programs.

We strongly encourage the plan to focus substantially on opportunities here, including expanding managed charging programs and incentives, flexible interconnections for both scheduled and dynamic flexibility, transparent utility planning standards, strong utility performance incentives, and locational targeting of programs and incentives for both front-of-meter and behind-the-meter.

3. Comment on opportunities to expand load flexibility resources, particularly through voluntary consumer-enabled mechanisms.

Expanding flexible demand, as mentioned above, is a large opportunity to reduce transmission, distribution, and supply costs for ratepayers. One opportunity to expand flexible demand is by unlocking bidirectional charging. A previous bidirectional charging pilot was unsuccessful, however as technology in this area is changing quickly, the opportunity to increase the value of customer-owned storage as a grid asset is worth exploring in the context of the energy plan. As a broader point, given the size of electric vehicle batteries and their potential to serve as grid assets in aggregate, the plan should consider additional ways to incentivize electric vehicle adoption.

¹⁹ Natural Resources Council of Maine. *Maine Needs Time-of-Use Rates to Drive Down Energy Costs*. <https://www.nrcm.org/blog/maine-needs-time-of-use-rates/>. October 2025

Additionally, the plan should focus on ways to accelerate Efficiency Maine Trust's BTM storage program, for example, including more near term booster incentives that layer additional compensation for third-party providers in the program for customer adoption of supporting technologies or rates, as well as possibly offering extended contracts for third party providers in the program.

4. Comment on opportunities to cost-effectively expand Maine's EV charging network as well as other clean or more efficient transportation technologies.

One significant area of potential growth in efficient electric transportation is in the medium and heavy duty (MHD) segment. Especially with high diesel prices, certain use cases – like delivery vehicles on predictable local routes – have strong electrification potential.²⁰ The plan should explore partnerships and pilots which can get more electric MHD vehicles on the road, increasing consumer comfort and public awareness and acceptance. An example could be pilots with transit providers using electric vans or buses for on-demand or flexed route service.

Objective E: Expand Clean Energy Career Opportunities for Maine People and Advance Innovation

2. Please comment on the role of energy in advancing economic development goals for the state and communities.

As noted above, clean energy is a major economic opportunity for Maine. Beyond creating jobs, deploying clean energy technologies also reduces costly fuel price volatility, lowers health costs, and keeps more economic activity circulating locally, among other benefits.

Large projects often come with larger potential economic benefits. The Northern Maine wind and transmission projects for example could generate hundreds of millions of dollars in economic activity, thousands of construction jobs, tens of

²⁰ MaineDOT; Maine Governor's Energy Office; Maine Governor's Office of Policy Innovation and the Future. *Clean Transportation Roadmap for Medium- and Heavy-Duty Vehicles*. <https://www.maine.gov/energy/sites/maine.gov.energy/files/inline-files/Maine%20Clean%20Transportation%20Roadmap%20for%20MHDV%20Full%20Roadmap%20with%20Appendices%20Nov2024.pdf>. November 2024.

millions of dollars in sales and property taxes paid to the state and local communities, and dozens of ongoing operations and maintenance jobs.²¹

Perhaps the largest economic impact would come from constructing a port to build floating offshore wind turbines and platforms in Searsport. A 2025 analysis found that if an offshore wind port is constructed and used to build 3 GW of floating offshore wind, it will support more than 6,000 jobs during construction, an average of nearly 1,000 jobs annually through 2050, and deliver total economic benefits of \$6.6 billion. Port facility construction alone will result in \$1.1 billion in economic activity in the region, including business activity, wages, and tax revenues for local communities. Importantly, these benefits would be realized if this scale of offshore wind development were constructed in the port at any point through 2050. Essentially, despite the Trump Administration's efforts to block the development of offshore wind, this port project remains one of Maine's largest economic development opportunities.²²

Thank you for the opportunity to comment on these important topics.

Respectfully,



Jack Shapiro
Climate & Clean Energy Program Director
Natural Resources Council of Maine

²¹ American Clean Power. *Testimony on LD 1710*.
<https://mainelegislature.org/legis/bills/getTestimonyDoc.asp?id=165179>. May 2021.

²² Karp Strategies. *Searsport Offshore Wind Port Economic Impact Analysis*. <https://www.nrcm.org/wp-content/uploads/2025/05/Searsport-Offshore-Wind-Port-Economic-Impact-Analysis.pdf>. January 2025.



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Heather Sanborn
PUBLIC ADVOCATE

April 27, 2026

Maine Department of Energy Resources
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RE: DOER Request for Information on potential updates to the Maine Energy Plan

On March 25, 2026, The Maine Department of Energy Resources (DOER) issued a Request for Information (RFI) seeking public comment on potential updates to the Maine Energy Plan. The Office of the Public Advocate (OPA) appreciates the opportunity to provide feedback.

The OPA's primary responsibility is to represent the interests of Maine utility consumers. Energy affordability is a key issue for utility customers and is gaining in urgency as prices continue to rise for many nondiscretionary commodities. Therefore the OPA is providing comments on Objective A of the Maine Energy Plan, which is: Deliver Affordable Energy for Maine People and Businesses. Below are the questions from the RFI and the OPA's responses.

1. How should the energy plan define energy affordability?

What is "affordable" for Maine families significantly depends on household income. Energy burden, defined as energy expenditures divided by income, is the percentage of household income devoted to energy expenditures. This should be included as a fundamental part of the affordability definition. The OPA first undertook a home energy burden study in 2019 to assess the impact of energy costs on Maine families, particularly low-income households. See [Maine Low Income Energy Burden Study June 2019.pdf](#).¹ In December 2024 the Maine Electric Ratepayer Advisory Council updated the affordability study through a report by VEIC & Beech Hill Research. See [VEIC](#).² The 2024 study found that

¹ Allison, Avi et al. *Maine Low-Income Home Energy Burden Study Final Report*, prepared for Maine Office of the Public Advocate (June 3, 2019)

²VEIC & Beech Hill Research, *Quantifying Maine's Household Energy Burden and Affordability Gap*, A report to the Maine Electric Ratepayer Advisory Council (December 1, 2024).

low-income households in Maine are facing total energy burdens of 30% of household income. This burden includes spending on electricity, household fuels, and transportation energy, and is triple the total energy burden faced by all Maine households.

For spending on household energy alone, excluding transportation, it is common for energy assistance programs to use a 6% energy burden threshold for affordability. Home energy burden, excluding transportation, is 14% for Maine's low-income households. Over 200,000 households are facing unaffordable home energy burdens. While there is no single number that can capture "affordability," recognizing the impact of energy burden on different income levels is vital to ensuring all Maine families are represented in the Energy Plan.

For example, in Maine there is substantial variation in energy expenditures by county. The 2019 study found that the two counties with the highest average energy expenditure levels were Hancock and Somerset counties, both located in Central Maine. Meanwhile, Aroostook County, covering the northernmost section of the state, had the lowest average energy expenditures. This may be counter intuitive and indicates that cold winters and associated differences in heating requirements are not driving regional differences in home energy expenditures among low-income Mainers. Other factors that could be driving geographic differences include heating fuel type prevalence, home ownership, and home size. In the 2024 study, energy burdens among low-income households varied from 19 percent in Washington County to 10 percent in Cumberland County. These differences must all be considered in defining affordability.

As expected, the study data showed that on average, lower-income households spend a higher portion of their income on home energy than higher-income households. It is generally well understood that higher income households spend more on energy in total, but that those expenditures represent a smaller fraction of their income. Those with incomes below the Federal Poverty Guidelines (FPG) have an average home energy burden of 24 percent, while those with incomes between 100 and 150 percent of the FPG face an average home energy burden of 14 percent.

The economic burdens of many families continue to increase. Assessing affordability must take into account the energy and other economic burdens of all income levels to ensure the costs of energy policies are equitably distributed.

2. How should the energy plan prioritize energy affordability while also ensuring modern and reliable energy infrastructure and meeting other goals?

Energy affordability can be prioritized by carefully validating the need for certain investments and managing the pace at which they occur. Investments to

modernize and increase reliability should follow data-based identification of cost-effective solutions. For example, in the utility context, there are many potential ways to improve reliability. Utilities could provide updated equipment standards to gradually make the grid more resilient to storms. They could better align winter equipment temperature ratings with the temperatures that occur during peak winter loads. They could adopt policies to defer capital investment, like enhanced transformer cooling. Such policies would cost-effectively facilitate the transition to a clean and reliable grid by avoiding or deferring the need to build costly transmission and distribution lines. Targeted, cost-effective energy investments can prepare the system for climate change while maintaining affordability.

Ensuring that electricity rates remain affordable is not only an end in itself, it is also essential to meeting clean energy and climate goals. Carbon emissions from electricity represent a small portion of statewide emissions, just 9% according to Maine's Department of Environmental Protection. Transportation and home heating, by contrast, account for a combined 68% of the State's emissions. Accordingly, the most important priority is to keep electric rates as low as possible to promote the electrification of the home heating and transportation sectors. If consumers see a financial benefit to switch to heat pumps or electric vehicles, they will do so. But if electricity rates continue to rise, Mainers will be reluctant to increase their electricity use, defeating the very goals these investments are meant to facilitate.

3. What strategies would help ensure energy affordability for households and communities with the highest energy burdens?

Funding public policy initiatives through energy rates places an undue burden of these costs on low- and moderate-income consumers. Wherever possible, funding initiatives in ways that allocate costs proportionately based on income, such as through General Fund funding, will protect lower income families and communities.

Additionally, Maine should fully fund the low-income assistance program for electricity based on household energy burden targets. Recently, the Legislature committed on-going General Fund funding for about 18% of the current cost of the program, with the remainder being funded by ratepayers. As costs continue to rise and more households enroll in the program through enhanced inter-agency data matching, it will be critical that this General Fund funding increases to ensure the program can be fully funded without an outsized burden on ratepayers. Maine must also continue to strongly advocate for robust federal support for low-income heating assistance.

4. What metrics should Maine use to track progress toward delivering affordable energy?

There are 4 metrics that can be part of an affordability measurement:

- 1) **Household energy burden** (energy costs as a percentage of household income);
- 2) **Energy inflation metric** (energy cost growth rate compared to Consumer Price Index (CPI) growth rate);
- 2) **Energy cost impact metric** (energy cost growth rate compared to wage growth rate); and
- 4) **Comparison metric** (energy cost growth rate in Maine compared to other US states and particularly New England states).

These are each discussed in more detail below. Collecting this data provides a comprehensive picture of how energy costs are affecting Maine consumers.

- 1) **Household energy burden** (energy costs as a percentage of household income)—this is a metric that is primarily concerned with affordability for the lowest income Mainers. This burden can be reduced through funding for well-designed energy assistance programs, including LIAP and HEAP. This metric can also give insights into whether funding and eligibility thresholds for these programs are adequate to meet the need. Typical baseline affordability targets are no more than 4% of household income for household electricity, 6% when heating is included in the energy usage calculation, and 10% when transportation is also included.
- 2) **Energy inflation metric** (energy cost growth rate compared to CPI growth rate)—this is a metric that takes a broader view of affordability by asking whether energy prices are growing faster than other costs in the economy. This metric can be useful in helping evaluate what is a reasonable pace of growth in rates for regulated utilities.
- 3) **Energy cost impact metric** (energy cost growth rate compared to wage growth rate)—this metric captures the financial impact of energy cost growth on Maine consumers in real dollars, by comparing energy price growth to the growth in wages.
- 4) **Comparison metric** (energy cost growth rate in Maine compared to other U.S. states and New England states)—this metric is helpful in determining whether Maine costs are rising faster than neighboring states or national averages. When and if they are, Maine can assess why and

determine what policy actions can be taken to reverse this trend.

When applying these metrics, it is important to consider both overall energy affordability as well as disaggregating the component parts. As Maine continues the shift toward using electricity for a greater share of overall household energy consumption, electricity will become a larger component of the overall energy burden. For example, under both the second and third metric, it is important to disaggregate electric supply, distribution, and transmission cost growth rates because the causes of growth in each of these components is different and requires different policy solutions. Increases in gasoline, propane, oil, or natural gas costs should also be disaggregated from electricity costs.

It is also important to backcast the affordability metrics, to the extent feasible, rather than starting from a 2027 baseline. It cannot be assumed that energy costs are affordable today—clearly, they are not. Backcasting the affordability metrics will allow for quantitative analysis of prior periods to see how these various metrics would have performed in prior periods when affordability was not at the forefront of consideration as it is today.

5. Are there other approaches that Maine should consider to reduce energy costs and price volatility?

Maine could consider a complete rethinking of the way the state procures the standard offer supply and pays for compliance with renewable portfolio standards. A more comprehensive approach to procuring supply could bring less volatility, reduce the risk premium paid to third-party energy marketers, and better integrate long-term renewable contracts with the standard offer supply to ensure maximized value.

6. Comment on available information, data, or provide feedback on energy supply resources or potential resources in Maine (potential resources include, but are not limited to, onshore wind, solar, biomass, biofuels, delivered fuels, waste-to-energy, energy storage, offshore wind, nuclear, natural gas, hydropower, geothermal, tidal energy, and other innovative technologies). Topics of interest include but are not limited to: a. Current/existing resources and operations b. Feasibility and opportunities for development of new or expansion of existing resources c. Land-use and siting considerations d. Technologies and other relevant characteristics that may influence deployment.

The OPA seeks to match resources to the identified need in the most cost-effective manner. One of the driving factors behind deregulation of the electric generation industry was to harness the competitive marketplace to discipline investment and reduce costs for consumers. State action can support a technology neutral marketplace to ensure a variety of resources will flourish. But state intervention, in the form of long-term contracts, should occur only when the marketplace has failed to provide a needed service. Such intervention should be

the least financial amount necessary to overcome market failures and last only until such market gaps are filled.

Rather than focusing only on state-driven procurements, state efforts can also target removing regulatory barriers that impede the development of competitive markets in energy supply. These barriers include lengthy interconnection queues, outdated utility system impact study practices, permitting hurdles, and regional market rules that are designed to favor the incumbent generators. Maine's continued focus on resolving regulatory barriers will promote steady progress on Maine's energy goals while protecting Maine consumers from costs associated with energy supply subsidies.

Thank you for the opportunity for the OPA to provide feedback on the Maine Energy Plan.

Respectfully submitted,

/s/ Heather Sanborn

Heather Sanborn
Maine Public Advocate

/s/ Susan Chamberlin

Susan Chamberlin
Senior Counsel
Office of the Public Advocate



April 27, 2026,

Via Electronic Mail

RE: PowerOptions' Comments on Maine's 2027 Energy Plan RFI

Maine Department of Energy Resources:

I am writing on behalf of PowerOptions, a nonprofit energy-buying consortium and trusted advisor to more than 800 nonprofit and public-sector Members across Maine and New England. We are mission-driven with a primary focus on reducing the cost, carbon, and complexity of energy for our Members through programming such as competitive energy procurements, clean transportation, building decarbonization, solar and storage, and energy sustainability and analytics.

Our work in Maine includes, but is not limited to:

- Transitioning the Maine PowerOptions (MPO) program and its 320+ public entity and nonprofit Members from the Maine Municipal Bond Bank (MMBB) and Maine Health and Higher Educational Facilities Authority (MHHEFA) to PowerOptions, providing MPO Members with expanded access to energy solutions while maintaining local presence and program continuity.
- Continuation of the MPO annual fuel bid, supporting around 50 Members with procurement of over 1 million gallons of affordable delivered fuel (No. 2 oil, propane, diesel, and gasoline) supported by roughly ten unique suppliers.
Supporting fourteen rural communities with on-site energy audits, technical assistance on energy benchmarking, and development of conservation roadmaps, funded through the Governor's Office of Policy Innovation and the Future (GOPIF).

PowerOptions' mission aligns closely with Maine's 2025 Energy Plan objectives of delivering affordable, reliable, and increasingly cleaner energy to Maine people and businesses. We hope to bring that shared interest into the upcoming 2027 Energy Plan.

Our comments below respond to the questions most relevant to PowerOptions' Membership and program experience. We focus on three themes that cut across our responses: (1) affordability for mission-driven nonprofit and public-sector organizations; (2) preserving and scaling the clean energy investments that our Members are making in solar, storage, efficiency, and electrified transportation; and (3) cost causation, transparency, and rate design principles that protect ratepayers through periods of policy and market volatility.

Part 2: Maine's Energy Landscape



Question A. Which market, policy, or economic shifts that have occurred in 2025/2026 do you consider to be the most consequential for energy planning in Maine, and why?

PowerOptions sees four shifts that have materially changed the energy landscape for our Members since the 2025 Plan was published and that should shape the 2027 Plan.

First, the forthcoming loss of the federal Investment Tax Credit for solar has substantially reduced the near-term economics of customer-sited and distribution-level solar projects that Maine nonprofits, municipalities, affordable housing providers, and public schools have been pursuing.

Second, the rescission of federal funding for renewable energy (e.g., Solar for All), clean heating and cooling technologies (including heat pumps), and clean transportation has removed a layer of support that had been expected to accelerate electrification and efficiency deployment in Maine.

Third, escalated and sustained conflict in the Middle East, including the war in Iran, is reinforcing the global fossil-fuel price volatility that the 2025 Plan identified as a core affordability risk.

Fourth, and specific to Maine policy, the repeal of the Net Energy Billing (NEB) program has removed an effective tool that Maine Members have used to develop distribution-level solar that leverages existing grid infrastructure, minimizes grid-upgrade costs, and delivers durable energy savings to participants.

Question B. What are the most important near-term impacts (over the next 1–3 years) that should be addressed through this Energy Plan or planning process?

PowerOptions believes the most immediate near-term risk is that the repeal of both federal tax credits and state programming for clean energy will put the state at risk for meeting its own clean energy and affordability goals. In our experience, Members are reliant on program stability and consistency for confidence to invest in clean energy and resiliency projects.

Within that stability, we encourage the Plan to prioritize three practical near-term levers: (1) programming development to incentivize distribution-level projects on the built environment, where siting and community opposition are lowest; (2) greater use of non-wires alternatives (NWAs), grid-enhancing technologies, and co-located storage to extract more value from existing grid infrastructure before committing to new poles and wires; and (3) expanded on-bill financing and power purchase agreement pathways for distributed energy resources (DERs).

Question D. How do these changes specifically affect socially vulnerable communities, and what can Maine do to make sure the Energy Plan is designed to benefit everyone?

In our observation, the current federal shifts raise the barriers to entry for resource-constrained Mainers, including low- and moderate-income households, affordable housing providers, small nonprofits, and rural municipalities to participate in clean energy ownership. Those barriers are not only financial; they include time and administrative capacity.

Maine can respond by building the 2027 Plan around three design principles for equitable access:

- First, program development that prioritizes technologies to reduce long-term energy costs (e.g., solar, storage, electrification), particularly for organizations that are resource constrained.
- Second, on-bill financing and power purchase agreements for DERs and energy efficiency improvements remove the upfront capital barrier while also providing long-term savings and stability.
- Third, preserve policy stability so that Members can continue to reliably participate in Maine's clean energy programming.

Part 3: Updating the Objectives of the Maine Energy Plan

Question A. Are the objectives from the 2025 Energy Plan still relevant? If not, what updates or changes would you suggest?

The five objectives outlined in the 2025 Plan remain applicable. In our view, two years is not a sufficient interval for transformative change in objectives of this scope, and PowerOptions supports continuity in the overarching frame.

PowerOptions recommends one addition: an objective, or cross-cutting strategy within the existing objectives, dedicated to education, marketing, and communication of the benefits of local, renewable, and efficient energy to Maine residents and businesses. In our observation, public discourse around renewable energy in the region has grown increasingly polarized, and the absence of clear, accessible communication from trusted state sources leaves room for misinformation to shape perception. Transparent communication of both the costs and the benefits of clean energy investments is essential to sustaining public trust in DOER's decisions and to the political durability of the Plan through implementation.

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

A.1. How should the energy plan define energy affordability?

PowerOptions recommends that the Plan define affordability in terms of a customer's total delivered energy burden across all commodities: electricity, natural gas, delivered fuels (heating oil, propane, kerosene), and transportation fuels, rather than measuring affordability on a single-commodity basis. Any attempt to combat price volatility for a single commodity (e.g., bill smoothing for fossil fuels) should consider the downstream bill impacts on the other commodities and holistic solutions that reduce the overall cost of energy instead of shifting costs around. For mission-driven nonprofits and public entities, affordability should also prioritize predictability and manageability of energy costs relative to budgets that are fixed annually. Cost volatility that forces an organization to trade off energy against program delivery is an affordability issue, not just for individual residents and families.

A.2. How should the energy plan prioritize energy affordability while also ensuring modern and reliable energy infrastructure and meeting other goals?

Affordability and modern, reliable infrastructure are complementary rather than competing priorities when infrastructure investment is sequenced to extract maximum value from existing assets before adding new ones. The 2027 Plan should prioritize energy efficiency, flexible interconnection, non-wires alternatives, grid-enhancing technologies, and co-located storage as the first tier of reliability investment, because each of these categories tends to reduce total cost per delivered kilowatt-hour. New capital infrastructure should be pursued where it is the least-cost path to meeting reliability and clean energy goals, evaluated against the full portfolio of alternatives.

Coordinated planning across DOER, the Maine Public Utilities Commission's integrated grid planning, the Efficiency Maine Trust's triennial plan, and the transmission and distribution utilities is essential to avoid duplicate cost recovery and to ensure that customers see affordability benefits rather than stacked surcharges.

A.3. What strategies would help ensure energy affordability for households and communities with the highest energy burdens?

PowerOptions recommends three strategies drawn from our Members' direct experience:

- First, expand on-bill financing and power purchase agreement pathways so that households and community-serving organizations can access clean energy and efficiency without upfront capital
- Second, provide targeted technical assistance and project management support to resource-constrained municipalities and nonprofits, which often face administrative barriers rather than economic ones.

- Third, structure any successor to the net energy billing program to prioritize access for low- and moderate-income households and community-serving facilities.

B.2. Are there new technologies or innovative solutions to advance reliability and resilience?

PowerOptions supports an all-of-the-above approach to innovative solutions focused on reducing energy burden for our Members. We have witnessed interest from our Membership across New England in aggregation of DERs and development of Virtual Power Plants, bi-directional charging of EVSE, individual and networked geothermal loops, and inquiries into the feasibility of small modular nuclear reactors. While we consistently support our Members with more traditional energy efficiency, weatherization, and electrification efforts, we are encouraged by DOER's approach to study innovative technologies. We'd also echo our previous remarks on leveraging technologies that enable the existing grid to provide the most value, including grid-enhancing technologies, non-wires alternatives, and flexible interconnection.

C.1. Please comment on the requirements, priorities, and considerations for the next three competitive solicitations under 35-A M.R.S.A. §10313.

PowerOptions recommends that DOER consider distribution-level procurements of solar and storage aggregations to further incentivize projects that can benefit both the local businesses that house these projects and the state towards its clean energy goals.

C.3. Please comment on the feasibility and/or costs of developing advanced nuclear technologies in Maine.

PowerOptions believes any investment in advanced nuclear should be evaluated on a consistent, least-cost, least-risk basis against the portfolio of other innovative energy solutions, including distributed solar and storage, efficiency, flexible interconnection, non-wires alternatives, and demand-side management. If advanced nuclear is pursued, total costs, risks, and ratepayer impact should be disclosed transparently so that the costs and benefits are visible to the customers who will ultimately bear them.

Notably, some of our Members in other states are exploring the feasibility of small-modular nuclear reactors as a long-term decarbonization option. Of note, these are traditionally larger facilities with existing fossil fuel plants that face substantial cost and feasibility barriers to electrification due to the local utility capacity.

D.2. Comment on opportunities to increase the efficient utilization of the electric grid.

Efficient utilization of existing grid infrastructure is, in our view, among the most cost-effective energy strategies available to Maine, and the 2027 Plan should elevate it accordingly. The concept of "existing resources" should be read to include not only generation assets but also transmission and distribution infrastructure; the primary strategy for reducing costs is to extract more use from what is already in place before committing to new capital.

Specific tools Maine should prioritize include advanced transmission technologies, grid-enhancing technologies, non-wires alternatives, flexible interconnection, and co-located storage. Utilities should be required to evaluate these tools with the same rigor applied to conventional capacity additions and should be directed to use battery energy storage systems in ways that defer or avoid traditional infrastructure spend. Load flexibility unlocked through time-of-use rate designs, controllable heat pumps and heat pump water heaters, managed EV charging, and behind-the-meter batteries extends this principle to the demand side and can provide cost-effective reliability while reducing peak loads and new infrastructure needs.

D.4. Comment on opportunities to cost-effectively expand Maine's EV charging network as well as other clean or more efficient transportation technologies.

PowerOptions recommends that EV charging expansion be anchored around community-serving organizations, including municipalities, public schools, hospitals, affordable housing providers, nonprofits, and houses of worship that operate facilities visited routinely by residents and workers across Maine. These organizations are trusted hosts for public-facing Level 2 charging and placing stations on these sites delivers access in the places people already go. They also tend to be capacity-constrained in money, technical knowledge, and staff bandwidth, so program design should include turnkey technical assistance and financing.

Part 5: Additional Considerations

Question 2. Please provide additional insights, perspectives, or examples you wish to share.

PowerOptions offers three additional considerations. First, we reiterate the recommendation in Part 3 that education, marketing, and transparent communication of the benefits and trade-offs of clean energy be established as a dedicated strategy under one or more of the existing objectives. In our view, sustained public trust is crucial to successful Plan implementation, and the state should invest in it explicitly.

Second, the Plan should explicitly recognize mission-driven nonprofit and public-sector customers as a distinct segment with affordability and capacity constraints that differ from both residential customers and conventional large commercial and industrial customers. The 2025 Plan's energy burden and affordability framing focuses appropriately on households; in our view, the 2027 Plan would be strengthened by a parallel framing for the organizations that deliver the public services households depend on, and whose cost trade-offs translate directly into reduced program delivery, deferred maintenance, or staffing cuts.

Third, considering federal policy volatility, the Plan should affirm Maine's commitment to its own clean energy and affordability goals and articulate how state-level policy stability will be maintained across administrations. Investor and developer confidence in Maine's market is, in our view, itself a ratepayer benefit.



Thank you for your consideration of our comments, for your leadership, and for your commitment to the reliability, affordability, and cleanness of Maine's energy future. Please reach out to us with any comments or questions to Sophia Gosselin-Smoske (sgosselinsmoske@poweroptions.org).

A handwritten signature in black ink, appearing to read "Sophia Gosselin-Smoske".

Sophia Gosselin-Smoske
Regulatory and Policy Analyst
PowerOptions



April 27, 2026

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

Acting Commissioner Cunningham:

ReVision Energy Inc. (ReVision) offers these comments in response to the Department of Energy Resources' (DOER) request for information regarding the 2027 Maine Energy Plan (2027 Plan), issued on March 25, 2026, regarding recommendations for updates to the 2025 Maine Energy Plan, recent changes in the state's energy landscape, and information regarding how the 2027 Maine Energy Plan can best serve Maine people and businesses.

Founded in Maine more than twenty years ago, ReVision is an employee owned, certified B Corporation clean energy construction company. ReVision has grown to over 400 co-owners, including over 200 at its branches in South Portland and Montville, Maine. Guided by a mission to make life better by building our just and equitable electric future, ReVision has designed and constructed thousands of distributed energy resources (DERs) serving Maine households, municipalities, schools, and businesses. These installations span solar systems, battery energy storage, heat pumps, heat pump water heaters, and electric vehicle chargers. Together, these products enable our customers to take strides toward whole-home and whole-business electrification, supplied with renewable generation.

I. Comments Regarding 2025 Maine Energy Plan

ReVision supports the objectives in the 2025 Energy Plan as important steps to building Maine's electric future in a manner that benefits all energy consumers. The 2025 Plan offers a useful summary of the harm that results from Maine's continued overreliance upon imported fossil fuels, including the exposure of Maine energy prices to volatile global markets. ReVision agrees wholeheartedly that a shift to local low-cost, renewable sources of electricity generation is essential to delivering the energy affordability and resilience needed to support continued economic growth and reduce household energy burden. The electrification of heating and transportation required to achieve Maine's emission reduction targets only adds to the urgency of investing in clean, affordable sources of generation to meet the projected load growth associated with beneficial electrification.

While ReVision was supportive of the 2025 Plan and believes the five objectives are still relevant, we believe there should have been express clarification that distributed energy resources, specifically solar and energy storage, can be ready deployed to support the timely and cost-effective achievement of Maine's energy targets. The 2025 Plan appeared



to focus on the critical importance of large-scale, low-cost clean energy resources, such as utility scale solar and offshore wind, without clear acknowledgement that these resources are generally not deployed at current date and face significant headwinds in future deployment, due to financial, siting, and interconnection barriers. The active obstruction of new and existing offshore wind projects by the federal government puts those risks in stark relief. For that reason, it is critical to further evaluate, in both quantitative and qualitative analysis, the role that distributed generation resources, especially solar and storage, can play to meet the state's clean energy goals today. While large scale renewable resources play an important role in the elimination of fossil fuels due to their ability to provide generation at the lowest levelized cost of energy, distributed generation resources, especially load-serving and/or behind the meter generation, often deliver greater overall value because they can leverage existing infrastructure and defer or minimize costly grid upgrades, while providing durable energy savings for all ratepayers. It is essential that any plan is both realistic and transparent about the barriers to energy deployment in place in our state and what types of generation are deployable today and can fulfill the state's energy goals, especially in the near-term.

This point is directly tied to the conversation around affordability. The 2025 Plan focuses on delivering affordable energy to the people of Maine, which clearly remains a top priority today. In the past, distributed generation resources were overlooked in certain analyses in favor of a focus on utility-scale clean resources because of the levelized cost of energy. To that end, it is essential to remember that the cost of distributed generation can be inflated by soft costs that are ultimately borne from policy decisions. Reducing such soft costs can enable distributed generation to better compete with larger resources that may face bigger barriers in terms of actual deployment. This includes streamlining and standardizing permitting and taxation, especially at the municipal level, and bettering utility interconnection processes. Examples of opportunities to make specific changes here include the adoption of [SolarAPP+](#) at the state level, streamlining municipal inspection scheduling, providing guidelines and [sample model zoning ordinances](#) for municipalities regarding siting, standardizing municipal taxation practices and/or allowing negotiated payments in lieu of taxes, and increasing transparency, modernizing screening rules, and embracing innovation regarding interconnection (including enabling flexible interconnection, power control systems, and meter socket adaptors).

While the political debate on energy affordability can often encourage the dissection of rate design, we highly recommend the 2027 Plan focuses on the bigger picture and what major levers could be pulled—and the tangible action steps to do so—to increase energy affordability, such as grid utilization or the reduction of supply costs. Leveraging existing resources means not only optimizing current generation but optimizing existing transmission and distribution grid infrastructure as using such a resource more efficiently is a prime way to achieve affordability.

Finally, we believe the 2025 Plan was thoughtfully developed and implemented regarding workforce development. We appreciate the Department's efforts to coordinate and bolster



efforts through public private partnerships and funding opportunities to effectively grow this fast-growing sector of our state's economy. Moving forward, we believe it is important to maintain existing programs and continue investment at the current level. Policy changes, as discussed below, have resulted in less growth in the renewable energy sector overall sadly rendering workforce development less of a priority today.

II. Recent Changes to Maine's Energy Landscape

Sadly, there have been many significant, negative rollbacks to policies that supported the growth and deployment of clean energy resources in the past two years, and thus the 2027 energy landscape looks significantly different than that of 2025. To begin, clean energy has faced significant headwinds at the federal level with the rollback of tax credits and onerous requirements for future deployment. Specifically, this includes the rollback of the 48(E) Investment Tax Credit, set to expire July 1, 2026, as well as the rollback of 25(D) the Residential Clean Energy Credit, which expired on December 31, 2025. In both instances, these changes have resulted in a loss of a previously available 30% tax credit for solar and storage systems at the residential level and solar systems at the commercial level. While avenues remain for a commercial entity to utilize tax credits and lease residential systems, the rollback of 25D has had a major impact on the residential solar and storage market. At a larger scale, commercial entities are quickly working to lock in final arrangements to utilize the ITC, which sunsets in just a few months. Additionally, the implementation of new, onerous requirements regarding access to bonus credits and system content (regarding components from 'foreign entities of concern') have stood up major challenges for the developer to overcome. Finally, the legal challenges and early withholding of the Greenhouse Gas Reduction Fund (GGRF) awards at the federal level, specifically the Solar for All awards, also leave Maine in limbo regarding the development of a new solar program, especially one that has the capabilities to serve low-moderate income Mainers, in particular. While legislation passed in 2023 (LD 1986) required the state to develop a new solar program in this regard, such a program never came to fruition due to the constantly changing nature of GGRF grants—and an ultimate outcome that remains unclear today.

Even more, Maine witnessed significant rollbacks at the state level, especially with the passage of LD 1777, "An Act to Reduce Costs and Increase Customer Protections for the State's Net Energy Billing Programs," which retroactively changed and ultimately repealed the state's net energy billing program for front of the meter resources, shutting the doors to solar energy resources serving schools, municipalities, and businesses, as well as residents via community solar. This not only ended the ability for larger solar resources to be compensated for generation, but ultimately harmed confidence in investing in the energy sector in Maine.

While many companies including ReVision are actively analyzing this new market reality, including what opportunities remain and what pivots are required, it is still early to tell comprehensively how deployment will be impacted. However, a few realities are clear: 1)



many solar companies have made their plans clear to exit the Maine market given the passage of LD 1777, 2) the challenging outlook for solar has forced companies to retract, and 3) deployment will decline without access to programs that provide a financial opportunity for solar and storage systems to receive fair compensation for the energy generation and storage they provide. Policy changes have significantly reduced customer choices when it comes to solar—residential customers are being pushed towards leasing and third party ownership, community solar customers are limited by the few projects that remain, commercial customers have very limited choices with the sunset of the Net Energy Billing Tariff Program, and low- to moderate-income customers have really no choices at all. A robust solar market would give all customers pathways to move forward on their energy transition journey in service of the state’s climate, clean energy, and electrification goals.

Lastly, the maintenance of commercial tax credits for storage at the federal level showcase the critical importance of the current storage procurement and ensuring an avenue for both utility scale and a load reducer program. As currently designed, it appears distributed generation projects could not compete in the current storage RFP, and the 2027 Energy Plan should outline the need for a future program to accommodate these resources given the myriad of benefits they provide with the storage value stack, as well as addressing the structural work that must be completed to ensure this is a reality, such as the way utilities study such projects for interconnection.

III. Designing A Plan in Service of Maine People & Businesses

ReVision wishes to offer six core policy recommendations for consideration and including in the 2027 Maine Energy Plan. The first three identify specific program and market outcomes Maine should drive; the latter three identify structural reforms required to enable conditions essential to the deployment of distributed generation.

1. Solar and Storage for Small Businesses, Nonprofits, and Municipalities

Maine’s small businesses, nonprofits, municipalities, and schools are eager to invest in onsite solar and storage, but current utility rate structures and program designs too often make these investments impractical or uneconomic. A customer that exceeds a modest monthly peak demand threshold is automatically moved into a rate class where net metering credits cannot offset a meaningful share of their bill, effectively locking out a large swath of commercial and institutional customers. The 2027 Plan should commit to finding solutions — whether through adjusting demand thresholds, creating a dedicated load reducer C&I solar program, or designing the net energy billing successor program to serve these customers — that make onsite solar and storage a viable, cost-effective option for Maine’s small and medium commercial sector.

Given the state level policy changes in 2025, ReVision has a keen interest in the DOER's development of a distributed generation "successor" program to maintain installation of clean energy resources that are readily deployable today. A durable program in this regard can result in continued replacement of fossil generation for the state's clean energy resources, which in turn reduces supply price volatility and stabilizes rates for all ratepayers. With net energy billing sunset on December 31, 2025, there is currently no way to sell solar projects in the state as there is no mechanism to receive fair compensation for generation. The thoughtful development of a new program, as prescribed in statute, can enable a pipeline to deploy more clean energy in Maine and bring new resources online in the immediate future.

However, as discussed, the inclusion and/or development of a load reducer program to serve larger commercial clients will be critical to not only serve Maine businesses—but to serve Maine's municipalities and schools, too. Right now, larger commercial customers could participate in the existing Kilowatt Hour Credit Net Metering program but can only utilize earned credits to offset volumetric charges on their utility bill. While this can serve entities in the Small General Service (SGS) rate class, once a facility's energy need is more than 20 or 25 kW, they are automatically moved to Medium General Service (MGS) and become demand metered customers, negating the benefit of earning net metering credits as they cannot offset a significant enough portion of their bill. To serve these customers—many of whom are eager to deploy onsite, behind-the-meter solar—we must either create an accessible load reducer program or modernize the kW threshold of the SGS rate class.

2. Energy Storage and Load Flexibility as a Strategic Priority

Energy storage and load flexibility are among Maine's most powerful tools for reducing energy costs, increasing renewable penetration, and building grid resilience — yet they remain underutilized and undervalued in current policy and program design. The 2027 Plan should explicitly recognize the full value that storage provides, particularly when co-located with solar generation and with load, including peak demand reduction, grid congestion relief, resilience, interconnection cost reduction and the ability to shift renewable energy to when it is needed most. Maine should position itself as a national leader in storage and load flexibility by pursuing a coordinated set of actions: designing future storage procurements that include a meaningful lane for distributed generation projects, expanding Efficiency Maine programs like the Small Battery Program, establishing a framework for virtual power plants that aggregates distributed resources into grid assets, and ensuring that rate design modernization reflects the true value these resources provide.

In that regard, DOER's successor program should include incentives for pairing projects with storage, and, as previously mentioned, it is critical that future

procurements offer participation to distributed generation storage projects, too, given their many benefits, but inability to compete in procurements designed for utility-scale projects. As noted in the 2025 Energy Plan, storage will continue to play a key role in increasing reliability and with the commercial tax credits remaining to support such a technology, the 2027 Plan should align to ensure this market has an opportunity for competition and deployment here in Maine. In that regard, DOER is required by law to conduct procurements and identify approximate total project award targets, and we believe it is important, where relevant, to ensure that in this work, DOER considers opportunities for distributed generation resources to compete within the procurement framework. The current storage RFP appears to be focused and/or designed to ultimately award utility-scale projects, and there should be either a future procurement or a clear lane or ‘carve out’ for distributed generation, too.

3. Solar Access for Low- and Moderate-Income Households

Maine should prioritize making solar energy accessible to low- and moderate-income households, affordable housing residents, and other underserved communities. This includes continuing to fight for the release of federally appropriated Solar for All and Greenhouse Gas Reduction Fund dollars that have been illegally impounded, and ensuring Maine is positioned to deploy those funds quickly when they are released. The 2027 Plan should also address structural barriers that prevent multifamily affordable housing from going solar, including allowing single-meter billing arrangements rather than requiring individual meters per unit. More broadly, the 2027 Plan should commit to identifying and removing economic and regulatory obstacles—the ‘soft costs’ borne through barriers including permitting and interconnection, for example—that keep solar out of reach for those who would benefit most from lower energy bills. When we drive up the overall costs of doing businesses through regulatory red tape, the projects on the margins that fall out of reality—often projects that benefit low- and moderate-income customers.

4. Permitting Streamlining and Code Modernization

The cost of installing rooftop solar and energy storage in Maine and across the US is being driven up not by hardware prices but by a growing layer of soft costs rooted in permitting complexity, inconsistent local rules, and code requirements that add expense without clear safety benefit. Across Maine’s municipalities, permitting timelines, fee structures, inspection requirements, and code interpretations vary widely — creating unpredictability that raises costs for installers and customers alike. Meanwhile, incremental additions to building and fire codes governing solar and storage systems have accumulated to the point where compliance costs are significant and rising, with little evidence that these requirements meaningfully improve safety outcomes. The 2027 Plan should commit to statewide

standardization of solar and storage permitting, including automated permitting platforms and inspection scheduling, mandatory timelines, capped fees, and single and virtual inspection options. It should also direct a systematic review of building and fire code requirements for solar and storage with an eye toward eliminating rules that add cost without demonstrated safety value. Finally, the Plan should address the regulatory pathway for R290 refrigerant-based heat pump equipment, which offers significant efficiency and climate advantages but currently faces code barriers preventing widespread adoption in Maine.

5. Interconnection Reform and Flexible Interconnection

Interconnection remains one of the most significant barriers to clean energy deployment in Maine. The current process lacks transparency, leaving developers and customers unable to predict timelines, costs, or outcomes, and erodes confidence in Maine as a place to invest in clean energy. Interconnection studies are slow, upgrade cost estimates are inconsistent, and the costs of required grid improvements are too often allocated entirely to individual project developers rather than treated as part of broader grid modernization. Equally important, current interconnection processes fail to recognize that paired storage fundamentally changes the grid impact of a solar project, reducing the need for costly upgrades. The 2027 Plan should address interconnection reform on multiple fronts: increasing transparency and accountability through enforceable timelines and penalties for utility non-compliance, embracing flexible interconnection tools such as power control systems and meter socket adapters that allow projects to connect faster and at lower cost, ensuring that interconnection cost allocation reflects the shared benefits of grid modernization, and establishing clear battery interconnection rules, including rules that credit the grid-stabilizing value of collocated storage.

6. Rate Design Modernization

Maine's current utility rate structures were designed for a grid that no longer exists — one built around one-way power flows and flat consumption patterns. As electrification drives load growth and distributed energy resources become more prevalent, rate design must evolve to reflect the true time-varying cost of electricity and to send the right price signals to customers and technologies. The 2027 Energy Plan should prioritize the adoption of time-differentiated rates that reward customers for shifting consumption away from peak periods, enabling load flexibility, virtual power plants, and storage to deliver their full value to the grid. Reforming demand charges — which currently make solar and storage investments impractical for many small and medium commercial customers, as well as challenge the deployment of electric vehicle charging infrastructure — should be a second near-term priority. Together, these reforms would unlock significant economic value for Maine ratepayers while accelerating the clean energy transition.



ReVision appreciates DOER's efforts to solicit feedback from a diverse set of stakeholders in the development of the 2027 Maine Energy Plan, and thanks DOER for the opportunity to provide these comments. We are available to answer any questions and look forward to participating in the stakeholder process to develop this plan over the course of the year.

Sincerely,

/s/ Lindsay Bourgoine

Lindsay Bourgoine
Director, Policy & Government Affairs
ReVision Energy, Inc.

Response to Maine DOER 2027 Energy Plan

Request for Information

Submitted by: Shred Electric

Date: March 26, 2026

Contact: Nick Planson, nick@shredelectric.com

About Shred Electric

Shred Electric is a Maine-based renewable energy company developing autonomous clean energy systems for the working waterfront, aquaculture, and agricultural sectors. Our products include solar-plus-battery refrigeration units (ShredCube), generator replacement systems (ShredPack), electric marine equipment, and cloud-based energy monitoring (ShredConnect). Our customers include Maine sea farms, boat yards, and land-based agricultural operations operating in remote or off-grid environments across the coast and islands of Maine.

We submit this response to highlight a gap in Maine's current clean energy financing landscape: **the absence of accessible, low-cost capital for off-grid and marine-sector clean energy equipment**. Closing this gap would meaningfully advance multiple objectives of the Energy Plan while supporting one of Maine's defining industries.

Part 2: Maine's Energy Landscape

Q2A – Most consequential shifts for energy planning

The federal pullback from clean energy incentive programs, combined with continued volatility in gasoline, diesel, and propane, is reshaping investment decisions at the farm and small-business level. For Maine's aquaculture and agricultural sectors — which are largely off-grid and have no access to utility programs — the economics of clean energy adoption hinge almost entirely on upfront capital cost and access to financing. This creates a policy gap: state and federal programs are predominantly designed around grid-connected systems and utility ratepayers, leaving working waterfront and rural off-grid operators largely outside the reach of existing support structures.

Q2B – Near-term impacts to address

Over the next 1–3 years, the most critical need is establishing financing mechanisms that function outside the utility system: low-interest loan programs, revolving loan funds, and direct grant support for off-grid clean energy equipment in the commercial marine, aquaculture, and agricultural sectors. Without these tools, adoption will stall despite strong operator demand.

Q2C – Financial decision-making at the household and private sector level

Small aquaculture and farm operators face the same capital constraints as other small businesses, with the added complexity of seasonal cash flow and limited collateral. Equipment replacement cycles are demand-driven, not incentive-driven — operators replace gasoline and diesel generators and aging refrigeration equipment when they fail, often under operational pressure. Targeted low-interest loan programs aligned with equipment replacement cycles, paired with technical assistance, would significantly accelerate clean energy adoption in this sector.

Part 4, Objective A: Deliver Affordable Energy

Q4A-5 – Approaches to reduce energy costs and price volatility

Maine's working waterfront runs almost entirely on gasoline and diesel generators and propane — fuels that are both expensive and subject to global price volatility. Off-grid solar-plus-battery systems eliminate fuel costs and price exposure entirely for refrigeration, lighting, and auxiliary loads on sea farms, boat yards, and remote agricultural sites. The Energy Plan should explicitly recognize this off-grid clean energy opportunity and direct resources accordingly.

Specific recommendations:

1. **Establish a dedicated grant and low-interest loan program** for off-grid clean energy equipment deployed in aquaculture, commercial fishing, and agriculture. This could be administered through FAME, MTI, or an expanded Efficiency Maine program with explicit off-grid eligibility language.
2. **Create a revolving loan fund** modeled on similar programs in other states, targeting sub-\$250K equipment purchases with 0–3% interest rates and 5–10 year terms. The fund should be accessible to small operators without extensive collateral requirements.
3. **Allow agricultural and aquaculture PACE (Property Assessed Clean Energy) financing** to cover mobile and marine-deployed equipment, not only fixed structures. Current PACE structures exclude the equipment most relevant to this sector.
4. **Direct Efficiency Maine to evaluate program eligibility criteria** that presently exclude off-grid commercial operations, and to develop a pathway for those operators to access efficiency incentives for equipment such as solar-powered refrigeration and heat recovery systems.

Q4A-6 – Energy supply resources

Solar-plus-battery systems are commercially proven and deployment-ready for off-grid marine and agricultural applications in Maine today. Key characteristics relevant to state planning:

- These systems eliminate generator fuel costs and associated emissions on a per-site basis, with payback periods of 5–8 years at current diesel prices.

- Maine's distributed, coastal geography makes centralized grid extension uneconomic for many aquaculture sites — off-grid renewables are the only viable clean energy pathway for these operators.
- Cold chain integrity (reliable refrigeration) is directly tied to product quality and food safety for aquaculture and farm products — energy resilience for this application has economic value beyond the energy cost itself.

Part 4, Objective B: Reliability and Resilience

Q4B-2 – New technologies and innovative solutions

Autonomous solar-plus-battery systems deployed at the point of use — on farms, sea farms, and working waterfront facilities — provide inherent resilience by design. They are independent of grid infrastructure and require no transmission or distribution to function. For Maine's island and coastal aquaculture industry, which cannot rely on grid backup, these systems represent the most practical resilience solution available. The Energy Plan should acknowledge distributed, off-grid clean energy systems as a resilience asset for Maine's food production and marine infrastructure, and support their deployment accordingly.

Q4B-3 – Delivered fuel resilience

Maine aquaculture and agriculture are deeply exposed to fuel supply chains. Gasoline and diesel power the generators, hydraulic power packs, and refrigeration systems that keep operations running — and supply disruptions or price spikes directly threaten product viability on farms with active livestock (shellfish, finfish, produce). The vulnerability extends to the on-road cold chain as well: refrigerated transport trucks must idle their internal combustion engines continuously when stationary to maintain temperature, compounding fuel costs and emissions. Electrifying cold chain and auxiliary loads via on-site renewables and electric refrigeration severs this dependency and improves operational resilience without requiring any grid connection.

Part 4, Objective C: Responsibly Advance Clean Energy

Q4C-6 – Financial barriers to clean energy deployment

The primary barrier to off-grid clean energy adoption in Maine's marine and agricultural sectors is upfront capital, not technology maturity or willingness to adopt. The systems exist, operators want them, and the economics work over a reasonable payback horizon — but small operators with seasonal cash flow cannot self-finance equipment purchases without support. Shred Electric's systems range from \$10,000 to \$200,000 depending on scale and application; we regularly hear from small dairy farmers who cannot access even a \$10,000 solar refrigeration unit without grant or loan assistance. Recommended financial tools:

- **Direct grants** (cost-share or fully grant-funded where operator need justifies) for aquaculture and agricultural clean energy equipment through DOER, FAME, or USDA REAP/SARE coordination.
- **Low-interest equipment loans** at 0–3% through a dedicated state revolving fund or expanded FAME program, with streamlined underwriting for small operators.
- **Sales tax exemption** for solar, battery, and electric marine equipment used in commercial food production operations.
- **Accelerated depreciation guidance** at the state level to complement federal bonus depreciation for qualifying clean energy equipment.

Part 4, Objective E: Clean Energy Career Opportunities and Innovation

Q4E-1 – Workforce trends and priorities

Maine’s clean energy transition in the marine and agricultural sectors will require technicians capable of installing, operating, and servicing solar-plus-battery systems in marine environments — a specialized skill set that differs meaningfully from standard residential solar installation. The Energy Plan should support development of marine-specific clean energy training curricula through vocational programs and community colleges, with an emphasis on electrical safety, salt-spray-rated systems, and DC marine electronics.

Q4E-3 – Energy and economic development

Maine’s aquaculture industry is a growth sector with direct ties to coastal community employment. Reducing energy costs for sea farms and working waterfront operators improves the competitiveness of Maine-grown seafood and supports the broader food system. Clean energy adoption in this sector is not purely an environmental objective — it is an economic development and food security objective with direct relevance to rural coastal communities.

Q4E-6 – R&D and demonstration support

Maine is well-positioned to lead in off-grid marine clean energy systems. The combination of a large working waterfront, active aquaculture industry, island communities dependent on delivered fuels, and a growing clean energy sector creates natural conditions for demonstration projects and commercially deployable innovations. DOER should consider a targeted demonstration grant program for off-grid, marine-deployed clean energy systems, with preference for projects that integrate cold chain applications and can produce replicable models for other Maine operators.

Summary of Key Recommendations

5. Establish a dedicated grant and low-interest loan program for off-grid clean energy equipment in aquaculture, commercial marine, and agriculture — administered through DOER, FAME, or Efficiency Maine with explicit off-grid eligibility.
6. Develop a revolving loan fund for sub-\$250K clean energy equipment purchases, accessible to small operators with seasonal cash flow and limited collateral.
7. Expand PACE financing eligibility to include mobile and marine-deployed equipment used in commercial food production.
8. Direct Efficiency Maine to evaluate and remove barriers to off-grid commercial operator participation in efficiency incentive programs.
9. Support development of marine-specific clean energy workforce training through vocational programs and community colleges.
10. Create a demonstration grant program for off-grid marine clean energy systems to generate replicable models for Maine's working waterfront.

Shred Electric welcomes the opportunity to participate in stakeholder meetings and provide additional technical input to DOER. Please contact Nick Planson at nick@shredelectric.com to arrange a presentation or discussion.



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MAINE CHAPTER

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Founded in 1892, Sierra Club is one of our nation's oldest and largest environmental organizations. We work diligently to amplify the power of our 3.38 million members and supporters nation-wide as we work towards combating climate change and promoting a just and sustainable economy. To that end and on behalf of Sierra Club Maine's over 20,000 members and supporters, we are responding to the DOER's 2027 Maine Energy Plan RFI.

The RFI questions were excerpted verbatim below in italics. We have not answered all the questions, only addressing those in which we had interest or knowledge. As we answer the questions posed in the RFI, we draw attention to the current escalation in gasoline and diesel fuel prices in Maine due to events in the Middle East which have consequently raised prices on fossil fuels on the global scale. It is not too long after a similar escalation in natural gas prices due to the start of war in Ukraine in 2021. It is evident that Maine is an unfortunate captive of the volatile fossil fuel energy market – energy planning for the future must first and foremost recognize this and plan to bring our dependence on fossil fuels down to nearly zero. The path forward should be entirely along the electrification trajectory.

Within the framework of an electrification trajectory, energy planning should heed the recommendations of the recent Brattle report¹ commissioned by DOER, repeated here verbatim:

Transition to Renewables

- Renewables displace energy production from thermal plants, which means Maine ratepayers will be less exposed to volatility in natural gas prices.
- Cancellation of federal tax credits and support for renewables will make electricity generation more expensive. This makes it more important for Maine to streamline the development process for renewables (reducing administrative costs) and enable developers to be able to tap into other capital pools.

¹ The Brattle Group, 2026, *Factors Driving Electricity Prices in Maine*, <https://www.maine.gov/energy/sites/maine.gov.energy/files/2026-02/Factors%20Driving%20Electricity%20Prices%20in%20Maine%20Feb%202026%20Brattle%20for%20DOER.pdf>

Invest in Load Flexibility

- A 2025 Brattle report finds that load flexibility in Maine can substantially reduce costs across the generation, transmission, and distribution systems.
- Virtual power plant (VPP) capacity used to serve peak load costs ~40–60% of the cost of gas peakers and utility-scale batteries.
- Adopting a strategy that employs load flexibility can mitigate the need for utilities to install costly new electrical equipment.

Adopt Economical Electrification and Energy Efficiency

- Because fuel oil and propane boilers are more costly to operate than electric heat pumps, shifting customers from these systems to heat pumps can reduce energy expenses, even if electricity prices rise.

Although the Brattle report focused on lowering costs of electricity, the above recommendations mostly align with Maine’s net-zero carbon goal.

Part 1: Engaging in Maine’s Energy Plan

A. What recommendations do you have regarding the best ways to engage and solicit feedback from the public throughout the energy planning process in calendar year 2026?

B. Are there any regional or geographic considerations DOER should consider when planning outreach and engagement?

C. Are you or your organization interested in participating in stakeholder meetings (virtual or in-person), small group discussions, or having DOER present to your organization or community about the planning process? If so, what format works best for you?

D. Are there specific topics that you would most like to see covered in public meetings or workshops?

We would like DOER to seek input from the public on distributed energy resources (DERs), virtual power plants (VPPs), and the like. In other words, how much is the general public interested in participating in the realization of the energy plan by installing and using equipment within those frameworks.

E. What are the best ways to connect with and include socially vulnerable counties and communities in the energy planning process? “Socially vulnerable counties and communities” are defined in law as “those counties and

communities in the State containing populations that are disproportionately burdened by existing social inequities or lack the capacity to withstand new or worsening burdens.”

a. The Maine Social Vulnerability Index (MSVI) is based on 19 socioeconomic and demographic indicators taken from US Census data. The MSVI is a customized version of the US Centers for Disease Control’s social vulnerability index. Please comment on whether and to what extent DOER should utilize the MSVI to inform engagement with socially vulnerable counties and communities.

Part 2: Maine’s Energy Landscape

A. Which market, policy, or economic shifts that have occurred in 2025/2026 do you consider to be the most consequential for energy planning in Maine, and why?

The federal attempted shutdown of offshore wind energy, largely accomplished for the Gulf of Maine during this administration, has a ponderous effect on renewable energy planning for Maine. This potential resource was slated to provide roughly one-half of Maine’s electricity demand by 2040 (Figure 24 in 2025 Maine Energy Plan). While offshore wind energy will prove critical to Maine and the region long-term (and we will continue to advocate for its development), the State may need to readjust clean energy procurement, especially in a way that does not include environmentally harmful technologies, like nuclear or large-scale hydro.

In new technology, home batteries and plugin solar, now somewhat rare, may become widely marketed in the years ahead, enabling homeowners to provide their electrical backup, offset some of their electricity bills, and help to shave the peak demand curve. The 2027 Maine Energy Plan should recognize the benefits of these technologies and plan for their wide adoption.

The March-April blockage of oil shipments in the Strait of Hormuz has once again inflated the price of oil products. This should help to convince consumers of the wisdom of purchasing EVs for transportation, help to convince households to convert from oil boilers to heat pumps, and help to convince transport and delivery businesses to move their fleets to EVs. This all should accelerate the electrification transition. DOER should emphasize the detrimental effects of fossil-fuel price volatility in its 2027 Maine Energy Plan.

B. As it relates to Maine, what are the most important near-term impacts of these changes (over the next 1-3 years) that should be addressed through this Energy Plan or planning process?

Home backup batteries, plugin solar, and EV-to-grid require a new paradigm in energy planning where much of the need for community-scale or utility-scale generation resources can be met with more granular DERs. Although the hardware installation rate will perhaps only grow slowly in the next 1-3 years, the planning for software, regulations, public education, and workforce training to handle these new DERs must be started immediately. A commitment within state and local governments must be established to further the use of DERs.

C. How are these changes influencing financial decisions related to energy at the household and private sector levels?

Under appropriate VPP programs that reward small-scale DERs, the financial considerations bend toward investment in home batteries, plugin solar, and EVs because these devices can potentially have very attractive payback periods. Programs in other states that promote these devices are proving to be popular, becoming part of the overall energy planning.²

D. How do these changes specifically affect socially vulnerable communities, and what can Maine do to make sure the Energy Plan is designed to benefit everyone?

We believe DOER means “economically” rather than “socially” vulnerable communities here. The affordability of sealing and insulating and of energy appliance upgrades such as heat pumps has been greatly enhanced in Maine by the incentives of Efficiency Maine Trust. We strongly advise extending these economic incentives to home batteries and plug-in solar, two examples of DERs readily adaptable to many low- to moderate-income residences. These devices can also be supported in multi-family units.

Part 3: Updating the Objectives of the Maine Energy Plan

A. Are the objectives from the 2025 Energy Plan still relevant? If not, what updates or changes would you suggest?

Objective C (Responsibly Advance Clean Energy) of the 2025 Energy Plan needs a hard look. Again, we point to Figure 24 of that plan because of the

² Rocky Mountain Institute, 2024, *Virtual Power Plant Flipbook*, <https://rmi.org/insight/virtual-power-plant-flipbook/>

heavy reliance on offshore wind energy to supply Maine's electrical demand in the 2040 goal of totally clean electrical energy. It is not clear at this time, due to federal policies, whether that resource can be fully developed in time to meet our goals. An alternative path to the 2040 goal must be put forth.

Objective D (Deploy Efficient Technologies to Reduce Energy Costs) of the 2025 Energy Plan also needs a hard look. The most significant thing affecting affordability is the dependence on gas to feed the peak in the demand curve. Strategies should be strengthened to enable nascent technologies such as home batteries, plugin solar, and EV-to-grid because these have multiple benefits to adopters, including affordability, as well as to electricity customers at large. Especially EV adoption needs to be hastened because Maine is lagging in this – 2023 registration statistics indicate little more than 1% of passenger vehicles in Maine are EVs³. A strategy is especially needed to get chargers into multi-family housing so that these residents can save on fuel costs just as those in single-family housing can when they install home chargers. Besides fuel affordability, widespread EV adoption helps with two more of the important facets of energy usage: air-pollution and GHG emissions.

B. What data, underlying assumptions, or analyses from the 2025 Energy Plan should be revised or prioritized in the 2027 plan?

Part 4: Specific Questions Regarding the Objectives of the Maine Energy Plan

Objective A: Deliver Affordable Energy for Maine People and Businesses

1. How should the energy plan define energy affordability?

It needs to be recognized that electricity prices, despite a rash of recent negative coverage by the media, have not outpaced inflation⁴ over the past decades. In this light, energy is still affordable. (The ongoing crisis in the Middle East may cause a significant increase in the months ahead, however.) The same is basically true for fossil-fuel prices although the volatility is much higher. Price increases greater than the general inflation rate or the CPI afflict most fossil-fuel products at various times due to many reasons. If affordability were to be judged on stable pricing, then electricity is the preferred choice. But there is another factor making electricity the preferred choice: the amount of usable energy versus consumed energy for electrically driven devices is usually much higher

³Alternative Fuels Data Center, <https://afdc.energy.gov/data/10962>

⁴LLBL and Brattle, 2025, https://eta-publications.lbl.gov/sites/default/files/2025-10/full_summary_retail_price_trends_drivers.pdf

than for fossil-fuel driven devices. This is especially true for heat pumps versus oil boilers and for electric motors versus internal combustion engines in vehicles. Energy affordability is tightly tied to efficiency, and the energy plan must leverage this.

2. How should the energy plan prioritize energy affordability while also ensuring modern and reliable energy infrastructure and meeting other goals?

We recognize that the energy transition entails some upfront investment costs that will make reductions in overall energy costs unlikely in the near term. Taking a longer-term view on affordability would soften the impact of the necessary near-term investments.

3. What strategies would help ensure energy affordability for households and communities with the highest energy burdens?

Maine should continue those programs that provide bill relief for low- and moderate-income households, perhaps looking to enhance them. A vigorous program to advise these households on lowering their energy costs, on the order of the cooperative extension service for farming and gardening activities, should be established.

4. What metrics should Maine use to track progress toward delivering affordable energy?

Numbers of heat pumps installed is an indicator that cold-weather heating costs are decreasing for households with them. Numbers of EVs registered is an indicator that households are spending less on fuel to cover their transportation needs. The total energy capacity of short- and long-duration electricity storage (batteries, pumped hydro, compressed air) is an indicator of the ability to shave the peak demand curve without costly fossil-fuel peaker plant generation.

5. Are there other approaches that Maine should consider to reduce energy costs and price volatility?

6. Comment on available information, data, or provide feedback on energy supply resources or potential resources in Maine (potential resources include, but are not limited to, onshore wind, solar, biomass, biofuels, delivered fuels, waste-to-energy, energy storage, offshore wind, nuclear, natural gas, hydropower, geothermal, tidal energy, and other innovative technologies). Topics of interest include, but are not limited to:

a. Current/existing resources and operations

The most significant thing affecting affordability is the dependence on gas to feed the peak in the demand curve (see recent DOER report). The energy plan should have a solid strategy to deal with this. A collateral benefit is a reduction in GHG emissions.

b. Feasibility and opportunities for development of new or expansion of existing resources

Related to new technologies, the VPP paradigm offers considerable benefits if developed properly. The energy plan should discuss possible pathways to achieving a robust VPP mobilization within Maine's electrical network. One or more consultants with deep electricity experience should be employed to bring local expertise together and recommend a way forward.

Another new technology which has the potential to significantly reduce space-heating energy usage is Thermal Energy Networks (TENs). TENs is now being developed at the Roux Institute in Portland, and that could spur other new developments across the state to utilize this technology.

A technology field that is rapidly developing and that holds great potential is long-duration storage. When paired with renewable energy, long-duration storage can meet the vagaries of the demand curve, most notably the high-demand peaks now associated with evening hours and then future peaks associated with nighttime space heating and vehicle charging. One pumped hydro storage has already been proposed in western Maine, and more sites are possible. Compressed-air storage⁵ has many advantages and may become a competitive technology shortly. On the long-duration battery side, many chemistries are competing to become competitive; for instance salt-ion batteries⁶ are nearing commercial realization, avoiding the mining of lithium.

c. Land-use and siting considerations

It would be helpful for the DOER to develop public outreach that will dispel unwarranted objections to land use by renewable energy resources. Vast tracts of land are now being used

⁵ Zhang et al., *Advanced Compressed Air Storage Systems: Fundamental and Applications*, 2024, <https://www.sciencedirect.com/science/article/pii/S2095809924000559>

⁶ Manchin and Marquez, *Sodium-Ion Batteries: Advances, Challenges, and Roadmap to Commercialization*, <https://www.mdpi.com/2313-0105/12/4/131>

elsewhere to supply Maine's energy consumption of fossil fuel products. The land required for corn ethanol production alone to feed Maine's gasoline consumption would exceed that needed for solar/battery farms to supply the future doubled or tripled electrical load in Maine. Renewable energy land use will simply become part of the Maine infrastructure needed to support our lifestyles, businesses and industries.

d. Technologies and other relevant characteristics that may influence deployment

We have in the modern automobile a large array of sensors and processors to manage our daily transportation. This compares with a minuscule to non-existent array of electronics to manage our daily household energy and the electrical grid that supports it. The future grid must be an intelligent one that outperforms the automobile of today. We should today begin to exert the human resources needed to design the interoperating grid and home of tomorrow that can shave the peak demand curve, provide for outages, charge and discharge our vehicle batteries, and seamlessly incorporate distributed solar energy.

7. Please comment on expected trends for energy demand in Maine.

Absent any population increase, total energy consumption in Maine should decrease with electrification efforts because of the inherent efficiency of electrical appliances, space heating, and vehicles. Electricity consumption will however trend oppositely, and predictions of electrical demand by a factor of three by year 2050 are not unreasonable. Figure 23 of the 2025 Maine Energy Plan suggests a doubling of total electrical demand in Maine, but full electrification of all energy consumption sectors implies an even higher multiplier because we are starting from a point at which fossil fuels dominate Maine consumption.

Objective B: Ensure Maine's Energy Systems are Reliable and Resilient in the Face of Growing Challenges

1. Please comment on how grid resilience, reliability, and security should be considered in Maine energy planning and how the state should be tracking/considering reliability and resilience in this Plan

2. Are there new technologies or innovative solutions to advance reliability and resilience?

3. Please comment on delivered fuel resilience, reliability and security.

4. Please comment on whether any statutory, regulatory, or policy changes are needed to support access to information about critical energy reliability and resilience topics across and or all energy sectors in Maine. 5. What emerging risks or resilience challenges should the state consider when planning for energy security, and what general approaches, resources, tools, or technologies may help address challenges and improve information sharing and coordination?

Objective C: Responsibly Advance Clean Energy

1. Under law, DOER is required to identify approximate total project award targets for the next 3 competitive solicitations to be conducted by the department pursuant to 35-A M.R.S.A. §10313. Please comment on this requirement including priorities and considerations for the next three competitive solicitations and implementation of §10313.

2. Under law and through the Maine Offshore Wind Initiative, offshore wind remains an important part of the state and regional long-term energy future. What offshore wind data, research, information, or other considerations should be considered in the development of the energy plan?

3. Please comment on the feasibility and/or costs of developing advanced nuclear technologies in Maine.

4. Relevant to the energy plan and pursuant to Resolves 2025, ch. 39, DOER is conducting a study, in consultation with other state agencies, evaluating the role of hydroelectric power generation, pumped hydro storage, and geothermal systems in meeting Maine's energy and climate goals. Please comment on:

a. Emerging technologies that could safely and effectively improve or expand existing hydroelectric power generation capacity in the state;

We do not support new hydroelectric power stations greater than 10 MW in capacity. However there are small hydroelectric generators of the run-of-the-river type that could supply smaller communities with electricity at reasonable costs⁷.

b. Characteristics of locations in the state that might be suitable for pumped storage hydropower system development;

The Australian National University has published a map⁸ of Pumped Hydro Energy Storage (PHES) sites that fit a range of requirements for pumped storage, and Maine has many feasible locations on that map.

c. Considerations for developing district geothermal systems on brownfield sites in the state.

d. Any other initial comments related to the Legislatively directed hydropower and geothermal studies.

Objective D: Deploy Efficient Technologies to Reduce Energy Costs

1. Please comment on any opportunities for increased energy efficiency in any sector in Maine, including opportunities to advance specific technologies (ie: weatherization, wood heat, combined heat and power, heat pumps, etc.) or associated policies.

We are now seeing some important developments with heat pumps coming to market – the window heat pumps⁹. These open up the potential to convert apartment and other rental units to heat-pump heating and cooling. A major breakthrough in this technology is the ability to easily install and uninstall the units, thus making them portable for renters.

2. Comment on opportunities to increase the efficient utilization of the electric grid.

3. Comment on opportunities to expand load flexibility resources, particularly through voluntary consumer-enabled mechanisms.

VPP (Virtual Power Plant) technology is being rolled out at an increasing pace across the nation. The Virtual Power Plant Summary

⁷ Ocean Renewable Power Company, <https://orpc.com>

⁸ Australian National University, 100% Renewable Energy Group, <https://re100.anu.edu.au/>

⁹ Cielo, *An InDepth Guide to Window Heat Pumps*, <https://cielowigle.com/blog/in-depth-guide-for-window-heat-pumps/>

Table¹⁰ lists dozens of programs across the US. They also provide guidance for states wishing to provide such a program. Maine has yet to offer this to its residential customer base, and we recommend that VPPs be an essential part of the Maine Energy Plan.

4. Comment on opportunities to cost-effectively expand Maine's EV charging network as well as other clean or more efficient transportation technologies.

Roughly one-half of Maine residents are in rental units where no charging facility exists. As a first step, building codes should require the installation of the electrical infrastructure needed to enable charging units to be placed in parking areas of newly constructed rental units and be connected to the renter's utility meter. Only by "home" charging can EV charging be made truly cost-effective.

Objective E: Expand Clean Energy Career Opportunities for Maine People and Advance Innovation

1. Please comment on workforce trends, needs, and priorities for Maine's energy workforce, including new opportunities for Maine to lead.

2. Please comment on how the energy plan should consider job quality or other considerations as it relates to growing Maine's economy and supporting family-sustaining careers. 13 2. Please comment on the role of energy in advancing economic development goals for the state and communities.

3. Please comment on programs, tools, or resources that would support investment in the clean energy economy in Maine.

4. Please comment on programs, tools, or resources that would support workers in the traditional energy sectors, including fuel delivery.

5. Please comment on climate and clean energy innovation and the needs of the state.

¹⁰ Clean Energy States Alliance, *Virtual Power Plant Program Summary Table*, <https://www.cesa.org/projects/energy-storage-policy-for-states/virtual-power-plant-programs-summary-table/>

6. Please comment on programs, tools, or resources that would support research, development, and demonstration of innovative energy technologies and projects.

7. Please comment on necessary trainings, education, or other information that should be considered for future Clean Energy Partnership programming.

Part 5: Additional Considerations

1. Are there any other considerations related to the statutory requirements of the Maine Energy Plan that should be taken into account as the 2027 plan is developed?

2. Please provide additional insights, perspectives, or examples you wish to share.

People will certainly complain about high electricity prices. However, there are things individuals can do during the peak demand times when gas generation causes wholesale prices to inflate considerably. France has a program of alerting electricity customers with text messages¹¹ which indicate that prices could go up due to coming demand peaks. Maine should consider how to implement something similar. People may respond positively, given the right public relations campaign joined with the program. Let's empower people to help lower costs.

¹¹ The Irish Times, 21 April 2026, *The Simple Text Message That Helped France Cut Its Electricity Usage by 10%*, <https://www.irishtimes.com/opinion/2026/04/21/sadhbh-oneill-the-simple-text-message-that-helped-france-reduce-its-electricity-usage-by-10/>

From: [Chris Spychalski](#)
To: [DOER](#)
Cc: [Anthony, Ross](#)
Subject: Energy Plan RFI
Date: Wednesday, March 25, 2026 2:35:55 PM

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.

What's changed is how water heating can be more efficient so Mainers can use less electricity for the same amount of hot water.

Unitary design HPWH are common but very sensitive to input air temperature. By ignoring air supply temperature, the laboratory UEF efficiency is not achieved in many installations; resulting in a higher than expected electric bill. Split design offers 3 ways to reduce electricity use:

1. larger/better heat exchanger (bigger coil & fan, size not limited to diameter of tank)
2. micro-channel tubing around tank
3. location choices (locate HP for warmer air, locate tank for fastest hot water delivery)

Education solves the missed opportunity problem I see when a homeowner/contractor isn't offered a choice between split or unitary design. Blindly choosing 1 results in higher electric demand for the life of the water heater. Better to choose between 2 designs to maximize UEF Efficiency for the unique requirements of the location. I'm asking for help to spread the news that a choice is available.

Water heater leasing is done in neighboring states. Why not in more areas of Maine?
<https://unitil.com/electric-gas-service/products/rent-water-heater> Affordable monthly payments benefit many who don't have the full investment capital available. How can leasing be supported for more locations in Maine?

Yours,
Chris Spychalski

ps Ross Anthony at DOER reviewed my presentation on a split design heat pump water heater.

Chris Spychalski
Manufacturer Rep.
Omni split water heater
Brunswick, ME
781-267-6000 cell

Response to: 2027 Maine Energy Plan Request for Information
Submitted by: Steffes, LLC
Contact: Jeff Myers
Date: April 22, 2026

Introduction

Thank you for the opportunity to provide input as Maine develops its 2027 Energy Plan. This response focuses on a critical and emerging challenge: **managing winter peak demand as electrification continues to scale across the state.**

Maine is transitioning from a historically summer-peaking system to one increasingly defined by **winter coincident demand**, driven in large part by rapid adoption of cold-climate heat pumps. While this transition supports decarbonization goals, it also introduces a structural risk: **increasing demand during the most constrained hours of the year.**

The central issue is not total energy consumption—it is when it is used.

Key Themes

- Maine is becoming a **winter-peaking system**
 - Peak demand—not energy consumption—is the primary system constraint
 - Residential heating load represents a **scalable, dispatchable resource**
 - Electrification of heating can add **5–10 kW of coincident peak demand per home**
 - Residential heating load is:
 - Highly coincident with system peaks
 - Predictable based on weather
 - Technically controllable
 - Traditional cost-effectiveness metrics (kWh savings) do not capture **coincident system value**
-

Electrification and Grid Impacts

Electrification of space heating is a core component of Maine’s energy strategy. However, as adoption increases, several grid impacts are becoming more pronounced:

- Rising **coincident winter peak demand**, particularly during extended cold weather events

- Increased reliance on **electric resistance backup heating**, which can significantly amplify peak load
- Localized distribution constraints driven by concentrated heating demand
- Customer-driven peak behavior during extreme conditions

In many cases, incremental peak demand from electrification can exceed **5–10 kW per home**.

Without deliberate load management, electrification risks increasing system costs despite improving efficiency.

Barriers to Electrification

In addition to workforce and upfront cost considerations, several structural barriers are emerging:

- **Electric panel capacity limitations** in existing housing stock
- Distribution infrastructure constraints in areas of high adoption
- Customer concerns regarding:
 - Winter bill volatility
 - Comfort during extreme cold events

These barriers are not solely technical—they are tied to **how peak demand manifests at the system and customer level**.

Role of Energy Storage and Demand Flexibility

Energy storage will play a critical role in addressing these challenges. However, it is important to recognize that **not all storage technologies serve the same function**.

- Battery storage provides short-duration, fast-response capability
- Thermal storage provides **long-duration load shifting aligned with heating demand**

Thermal storage, particularly when integrated with heat pump systems, is uniquely suited to:

- Shift heating load away from peak hours
- Reduce or eliminate resistance backup during critical periods
- Deliver multi-hour demand reduction during winter peak events
- Operate with minimal impact on customer comfort

A portfolio approach to storage—aligned with end-use demand—is essential to capturing system value.

Demand Flexibility as a Capacity Resource

Residential heating load represents one of the largest and most coincident contributors to winter peak demand.

When properly managed, this load can function as a **predictable, dispatchable capacity resource**.

Key characteristics include:

- High coincidence with system peaks
- Predictable response tied to weather conditions
- Ability to shift load through pre-charging strategies
- Minimal impact on customer comfort when properly implemented

This is not a theoretical opportunity—field deployments have demonstrated peak reductions of 5–10 kW per home.

Program Design and Cost-Effectiveness Considerations

Traditional cost-effectiveness frameworks often emphasize:

- Retail bill savings
- Total energy (kWh) reduction

While important, these metrics do not fully capture the value of resources that reduce demand during a **limited number of critical hours**.

Evaluation frameworks should incorporate:

- **\$/kW of coincident peak demand reduction**
- Avoided capacity costs
- Avoided transmission and distribution investments
- Winter reliability value

Resources that perform during peak hours deliver disproportionate system value and should be evaluated accordingly.

Program Design Recommendations

To better align incentives with system needs, Maine may consider:

- Expanding **performance-based incentives tied to verified peak demand reduction (\$/kW)**
- Enabling **aggregation of residential demand flexibility resources**
- Supporting technologies that can be:
 - Scheduled
 - Controlled
 - Verified during peak events

Maine has already established a strong foundation through performance-based programs. Expanding this approach to include **flexible heating technologies and thermal storage** represents a natural next step.

Equity and Affordability Considerations

Managing peak demand is directly tied to long-term affordability and equitable access to electrification.

Demand-flexible heating solutions can:

- Reduce upward pressure on rates by avoiding peak-driven infrastructure investment
- Lower barriers to adoption by:
 - Avoiding electric panel upgrades
 - Reducing reliance on high-cost resistance heating
- Provide benefits to:
 - Rural communities
 - Older housing stock
 - Customers currently dependent on fuel oil

This approach ensures electrification is:

Accessible, cost-effective, and scalable across Maine's diverse housing base

Why Now

Maine is at an inflection point:

- Heat pump adoption is accelerating rapidly
- Winter peak demand is emerging as a primary system constraint
- Infrastructure decisions made in the next 3–5 years will shape long-term costs

Acting now allows Maine to:

- Capture demand flexibility early
- Avoid unnecessary infrastructure buildout
- Establish a scalable model for electrification

Conclusion

Maine's electrification strategy is both necessary and achievable. Its success, however, depends on how effectively winter peak demand is managed.

Without deliberate peak management:

Electrification risks increasing system costs and grid constraints.

With the right approach, residential heating load can become a **scalable, dispatchable capacity resource** that supports reliability, affordability, and long-term system efficiency.

Electrification and peak management must advance together to deliver:

- **Reliable service**
- **Affordable rates**
- **A scalable clean energy future**

Managing Winter Peak Demand in Maine's Electrification Transition

The Emerging Challenge

Maine is transitioning from a summer-peaking system to one increasingly driven by **winter peak demand**, largely due to rapid adoption of cold-climate heat pumps.

While electrification reduces emissions, it also introduces new challenges:

- Increased coincident demand during extreme cold
- Greater reliance on resistance backup heating
- Localized grid constraints

The primary issue is not energy consumption, but **peak demand during critical winter hours**.

Why This Matters

Peak demand drives:

- Generation capacity requirements
- Transmission and distribution investments
- Long-term rate impacts

Without intervention, electrification can increase system costs—even as it improves efficiency.

A Key Opportunity: Demand Flexibility

Residential heating load represents:

- A large share of winter peak demand
- A predictable and controllable load

With the right approach, this load can be transformed into a **dispatchable resource**.

Role of Thermal Storage

Thermal storage—particularly when paired with heat pumps—can:

- Shift heating load away from peak hours
- Reduce or eliminate resistance backup during peak events
- Provide multi-hour demand reduction during critical periods

Unlike batteries, thermal storage is directly aligned with **heating demand**, making it particularly effective for winter peak management.

Rethinking Cost-Effectiveness

Traditional metrics (e.g., retail bill savings, kWh reduction) do not fully capture the value of peak-focused resources.

Evaluation frameworks should incorporate:

- **\$/kW peak reduction**
 - Avoided capacity costs
 - Avoided T&D investments
 - Reliability benefits
-

Program Design Considerations

Maine is well-positioned to build on existing programs by:

- Expanding **performance-based incentives (\$/kW)**
 - Enabling **aggregated residential demand response**
 - Including thermal storage within a broader definition of energy storage
-

Bottom Line

Managing winter peak demand will be critical to ensuring that electrification remains:

- Affordable
- Reliable
- Scalable

Demand-flexible technologies, including thermal storage, represent an important and underutilized part of that solution.

Colan, Caroline

From: Steven Ingalls <sjiemail@yahoo.com>
Sent: Friday, April 10, 2026 11:23 AM
To: DOER
Cc: Burgess, Dan; Sanborn, Heather B
Subject: Energy Plan RFI
Attachments: 216934.PDF; NCSP25 Comments.pdf

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.

The following are comments related to Maine's 2027 Energy Plan RFI. [Maine Energy Plan | Maine Department of Energy Resources](#)

1. Examine increasing the role of Grid Enhancing Technology (GET's) and virtual power plants (VPP), as discussed in the MPUC GETs Assessment, and ways to rapidly expand their deployment in Maine. Included in this would also be the deployment of both commercial and residential energy storage as well as, during peak load shaving situations, commercial and residential NG and LP generators. [2025.08.26 MPUC GETs Assessment final.pdf](#)
2. Examine the role of vehicle to grid (V2G) technology as discussed in the Maine Pathways to 2040 study. This ties into the VPP concept. [Maine Pathways to 2040 Analysis and Insights.pdf](#)
3. Examine the timing of when non-wire alternatives (NWA's) are considered in a transmission or distribution planning process such that it is done in the early stages of planning a project. This may further assist in lowering future ratepayer costs by better utilizing existing infrastructure where possible. [Title 35-A, §3132-C: Nonwires alternatives investigation and recommendations](#)
4. Examine ways in which the radial designed distribution circuits, that are very prevalent in rural Maine, can be increasingly configured so as to create a backup circuit tie for more of these radial circuits. This may address both resiliency and congestion issues. [CMP Integrated Grid Plan.pdf](#)
5. Examine ways to expand the rapid deployment of ground to sky tree trimming along all three phase distribution circuits to address reliability concerns. Also examine the strategic deployment of ground to sky tree trimming along single phase circuits in areas prone to storm damage and/or circuits that are generally the least reliable. [CMP Integrated Grid Plan.pdf](#)
6. Examine ways to expand the strategic deployment of covered conductors (tree wire) and stronger poles in areas prone to storm damage and/or circuits that are historically the least reliable, again to address reliability issues. [CMP Integrated Grid Plan.pdf](#)
7. Examine re-establishing elements of the Act to Protect Maine's Energy Sovereignty through the Designation of Energy Infrastructure Corridors and Energy Plan Development and the amendments that include the definition of a statutory corridor that includes Interstate 95 and 295 and the Searsport-Loring corridor. [PUBLIC656.pdf, 35-A ME Rev Stat § 122 :: Energy infrastructure corridors \(WHOLE SECTION TEXT EFFECTIVE UNTIL 7/30/15\) \(WHOLE SECTION TEXT REPEALED 7/30/15\) :: 2012 Maine Revised Statutes :: US Codes and Statutes :: US Law :: Justia](#)
8. Examine ways to promote, to the greatest extent practicable, the colocation/use of existing utility, transportation and railway corridors for new transmission infrastructure. This ties into the prior comment. This will likely speed up a project which could then reduce overall project uncertainty

and costs. [Utilizing Existing Right-of-Way to Deploy Transmission and other Linear Infrastructure - National Governors Association](#)

9. Examine establishing an "Unmanaged forest open space" category under the Farm and Open Space tax law to acknowledge the carbon capture benefits that a small unmanaged forested open space provides and to acknowledge that these small parcels may not be eligible to participate in a forest carbon credit program. A "Unmanaged forest open space" would be eligible for the same property tax reductions as a "Managed forest open space" but would be limited to forested land of no greater than 10 acres in size, which is noted as being less than the 10-acre minimum threshold to qualify for "Managed forest open space". [Title 36, §1106-A: Valuation of open space land](#)
10. Examine ways to promote the increased use of the Maine PUC Green Power Program. Ideas include offering a refundable tax credit to Maine ratepayers equivalent to the ratepayers cost of participating in the Green Power Program. Funding to cover the cost of the refundable tax credit could come from revenues the State/Efficiency Maine Trust receives for participating in the RGGI program. [Maine Green Power Program | MPUC](#), [Climate Mitigation Actions, Sustainability, Maine Department of Environmental Protection](#)
11. Examine ways to create a baseline community benefits package for transmission, generation and energy storage projects, while not infringing on a municipalities home rule authority, including the ability of a municipality to require more than the baseline. A baseline concept could look similar to the Grid-Scale Wind Energy Development program. [Title 35-A, §3454: Determination of tangible benefits; requirements](#)
12. Examine ways with which to facilitate the review/construction of solar and energy storage projects on the many closed municipal landfills throughout Maine to help expand microgrid development. [Closed Municipal Landfills | ArcGIS Hub Home](#), [Title 35-A, §3351: Microgrids](#)
13. Examine the role of tidal and wave energy generation in the Gulf of Maine, in part to offset the potential loss of offshore wind generation development in this area. [Regulation of Tidal and Wave Energy Projects, Maine Department of Environmental Protection](#)
14. Examine the role of small modular reactors (SMR's) located in Maine, prioritizing the placement and use of land based and floating SMR's near existing transmission infrastructure and high load centers. Potential sites include, but are not limited to, the Maine Yankee site in Wiscasset and the Wyman Energy Center site on Cousins Island in Yarmouth. The Wyman Energy Center location is suggested, in part, to reduce or eliminate the need for the Wyman Energy Center oil fired peaker generation plant and its attendant GHG emissions. This is also, in part, to offset the potential loss of offshore wind generation development in the Gulf of Maine and to help increase baseload generation capacity needs in Maine. [New England Governors Nuclear Statement.pdf](#), [A04_rsp_2025_draft_document.pdf](#), [Floating nuclear gains momentum at IPF 2026 | CORE POWER](#)
15. Examine ways to expand the production and usage of biofuels in Maine, in particular for bio-heating oil, to lower GHG emissions. [Castlerock Biofuels Selects Millinocket — CASTLEROCK BIOFUELS](#)
16. Examine the role of clean hydrogen production, storage and usage in Maine, in particular its role in fueling the medium/heavy transportation sector and its role as an additive to create synthetic natural gas for commercial/industrial use, including NG energy generation plants, and in residential use, in all cases to lower GHG emissions. [Case Details](#), [a04_rsp_2025_draft_document.pdf](#)
17. Examine the role of natural gas storage (likely LNG storage) located in Maine to help mitigate risks related to cost volatility and energy supply/security concerns during high winter natural gas demand or other regional/national/international constraints. [Role of Natural Gas](#)

18. Examine what role the Maine/New England Federal and State legislative representatives can play in having the federal government continue a waiver of the Jones Act for New England as it relates to energy and transportation related fuel deliveries, particularly LNG. [Jones Act Waiver Issued in Response to Iran Conflict: Legal Analysis and Implications | Insights | Holland & Knight](#)
19. Examine why certain Consumer Owned Utilities (COU) in Maine have overall lower ratepayer costs than Investor Owned Utilities (IOU) and what, if any, changes should be made so that ratepayer costs in IOU territories are brought in line with COU ratepayer costs. [Home | Eastern Maine Electric Cooperative](#)
20. Examine creating an intertie between the NMISA grid and the remainder of the Maine/ISO-NE grid, leveraging the Northern Maine Renewable Energy Development Program (NMREDP). A concept to consider is utilizing an energy storage facility in Northern Maine that supports both the NMREDP renewable generation and can act as a POI between the NMISA grid and the remainder of the Maine/ISO-NE grid. A potential POI would be between the energy storage facility and the Flo's Inn substation in Presque Isle. [response_maine_noi_9-24-2021.pdf](#)
21. Examine creating an intertie between NMREDP and New Brunswick to leverage energy resources between NMREDP and New Brunswick. A concept to consider is a tap line connection between the existing MEPCO transmission line 3001 and the proposed NMREDP POI at the Haynesville substation.
22. Examine means by which Maine can facilitate increasing the loss of source limitations as discussed in the following ISO-NE report. Among other possible benefits is that this may help to leverage greater utilization of the NMREDP transmission and generation assets. [A02 2025 12 05 ipsac iso loss of source.pdf](#). See also my comments directed to the joint ISO/RTO Planning Committee that are attached.
23. In conjunction with the loss of source subject, the State should facilitate an examination of where grid scale energy generation and energy storage is most likely to occur in Maine/Gulf of Maine, so that ISO-NE can use this data to assist in the loss of source planning process.
24. Examine where potential points of interconnection (POI's) may be located in Maine in conjunction with examining where grid scale energy generation and energy storage is most likely to occur in Maine/Gulf of Maine. As discussed in the ISO-NE offshore wind screening dated August 21, 2024, some potential POI's include Maine Yankee in Wiscasset, Surowiec in Pownal, Wyman Energy Center in Yarmouth, Raven Farm in Cumberland and South Gorham. [2050addlanalysis_poi_pac_aug2024_clean.pdf](#)
25. Stay informed as to the Memorandum between Massachusetts and Nova Scotia regarding offshore wind development and any implications/learnings it may have for Maine. [Massachusetts and Nova Scotia Launch Collaboration to Advance Offshore Wind | Mass.gov](#)
26. Stay informed as to the development of an SMR in New Brunswick and any implications/learnings it may have for Maine. [Home - Small modular reactors in New Brunswick](#)
27. Stay informed as to the development of the Gull Island and Churchill Falls extension hydro generation projects in Canada and any implications/learnings it may have for Maine. [Churchill River Study and Hydroelectric Development | Hydro-Québec](#)
28. Examine the expanded use and access/availability of lower emission public transportation vehicles for those living in rural areas. [Public, active, and shared transportation | Maine Department of Transportation](#)
29. Examine the expansion of passenger rail transportation from Brunswick north to Orono, utilizing the existing CSX rail corridor and utilizing lower emission diesel engines or battery propelled engines to reduce GHG emissions in the transportation sector. [Now's the time for Maine to extend passenger rail service, CSX System Map - CSX.com](#)

30. Re-examine the Efficiency Maine Trust EV rebate program in order to provide an opportunity to make certain longer-range PHEV's eligible for a rebate, to reduce peak kWh usage and to reduce GHG emissions in the transportation sector. As demonstrated in the attached report, PHEV's can reduce peak load kWh usage while meaningfully contributing to reducing GHG emissions, as an estimated 75% of PHEV miles driven would be electric.
[TPVI Appendix L4 Load Impacts EV Maine.pdf](#)
31. Examine the concept of a special registration fee for electric and hybrid vehicles so that they contribute towards supporting the transportation infrastructure sector they use through an alternative means other than through a gas tax. [Special Fees on Plug-In Hybrid and Electric Vehicles](#)
32. Examine ways with which to support work from home alternatives for both the government and private sector as a way with which to reduce transportation related GHG emissions and transportation related energy consumption. This may also enhance the potential for peak energy shaving opportunities due to workers being at home during off-peak hours and having greater flexibility to schedule time of use energy consumption during off-peak hours. [How state employees are showing the climate benefits of remote work | Maine Public](#)
33. Examine ways to partner with Maine Connectivity Authority in the utilization of transmission infrastructure for middle mile fiber optic coverage expansion and cellular signal coverage expansion. This will further support a work from home initiative, among other benefits. [Home | Maine Connectivity](#)
34. Re-examine the concept of Maine's transmission owners (TO's) exiting ISO-NE and expanding NMISA to include all of Maine. Note a study that is underway in New Hampshire that is examining New Hampshire exiting ISO-NE, as there may be learnings applicable to Maine that come about from that study. Also, see the attached pdf that includes a PUC docket #2008-156 filing that considered this subject for Maine. [Inv-2025-002-nhdoe-order-of-notice.pdf](#), [How to cut electric rates in Maine — without public power | Opinion](#)
35. Examine what learning and steps may need to be taken to ensure that ratepayers only pay TO's a return on equity that is just and reasonable, in light of FERC's recent order that TO's were receiving an unjust and unreasonable return on equity payment from ratepayers. [Maine Office of the Public Advocate Applauds FERC Decision Lowering Transmission Costs for New England Ratepayers | Maine Office of Public Advocate](#)

I believe what you will find from the comments above is an "All of the Above" approach, with a focus on affordability, reliability, and diversification.

Thanks,

Steven Ingalls
Stetson, ME

From: Maine Department of Energy Resources <doer@maine.gov>
Sent: Wednesday, March 25, 2026 12:54 PM

To: sjiemail@yahoo.com <sjiemail@yahoo.com>

Subject: 2027 Maine Energy Plan Request for Information and Upcoming Webinar

[View this email in your browser](#)



2027 Maine Energy Plan Updates

Maine Energy Plan Request for Information

The Maine Department of Energy Resources (DOER) has issued a [Request for Information \(PDF\)](#) (RFI) to inform the development of the [2027 Maine Energy Plan](#). DOER is required by law to update the Maine Energy Plan every two years. The next plan will be delivered to the Governor and the Legislature by January 15, 2027. The Energy Plan guides Maine's approach to energy policy, with a focus on delivering affordable, reliable, and increasingly clean energy to all people and businesses while achieving the state's statutory energy requirements and strengthening Maine's economy.

DOER welcomes public comments regarding the ways in which the energy landscape has changed since the publication of the [2025 Maine Energy Plan](#), whether and to what extent the original strategies and objectives should be updated, and how the next plan can best serve Maine people and businesses.

In response to the RFI, DOER invites any comment or information from individuals, municipalities, Tribal Governments, businesses, stakeholders, and any other interested parties. This is the first of several opportunities for public input during the planning process. Responses are due **no later than April 27, 2026** and may be submitted by email to doer@maine.gov with the subject line "Energy Plan RFI."

[View the Request for Information \(PDF\)](#)

Maine Energy Plan Stakeholder Survey

As an alternative to the Request for Information, the Department is also seeking public input through a [short online survey](#). Interested individuals or organizations are invited to complete this short survey to share input to inform the next plan.

Upcoming Event



This Friday, **March 27 at 10am**, DOER will host a virtual meeting to kick off the [2027 Maine Energy Plan](#). The meeting will include a discussion of Maine's 2025 Energy Plan and the planning process to develop the next plan over the course of 2026. The meeting will also cover a new Request for Information that DOER will release in the coming weeks to help inform the next plan, initial priorities including an emphasis on affordability, and broad plans for stakeholder engagement throughout the year. The meeting will be held via Zoom. Registration is required, click the button below to register for the meeting.

Register for the Energy Plan Kickoff Webinar



**62 State House Station
Augusta, Maine 04333**

maine.gov/energy | doer@maine.gov

As a party interested in energy issues, you are receiving this email from the Maine Department of Energy Resources to update you on recent and upcoming news and activities. Please share this email with your network. You can also [update your preferences](#) or [unsubscribe from this list](#).



April 8, 2026

Joint ISO/RTO Planning Committee (via email to PACMatters@iso-ne.com)

RE: Comment on the Northeastern Coordinated System Plan (NCSP25) dated April 3, 2026

To Committee Members:

The following is a public comment regarding the above matter. As discussed in section 5.1 of the NCSP25 plan, an interregional study of increasing New England's loss of source limit was initiated by ISO-NE on March 27, 2023 and the results of that study were shared with IPSAC at a December 5, 2025 meeting. As detailed in the December 5, 2025 IPSAC study summary, as of Q3 2025, ISO-NE suspended work on this project. ISO-NE noted that given the complexity of the study, as well as the need to coordinate between the three RTO's, the analysis done by the consultant exceeded the amount budgeted by ISO-NE. A summary of concerns and next steps were outlined in the December 5, 2025 study summary. Included in the next steps was a statement that "Given the list of issues that would need to be addressed prior to performing any additional analysis, and other competing priorities for the three RTO's, ISO-NE will be concluding the loss of source study with the analysis done to date."

I personally find ISO-NE decision to have as a next step to conclude this study to not be in the long-term best interest of New England ratepayers and not in the spirit of FERC Explainer for Orders 1920, 1920-A, 1920-B, where it discusses Interregional Transmission Coordination and the goal of the Commission for a more efficient and cost-effective grid. I acknowledge and appreciate the list of items that are articulated in both the December 5, 2025 IPSAC study summary and the NCSP25 plan dated April 3, 2026 that need to be accomplished prior to additional analysis being performed. I encourage ISO-NE that rather than concluding this study, ISO-NE budget sufficient funds, and all three ISO/RTO's dedicate sufficient internal resources, to re-engage the consultant to continue this study. This would allow for continuing to work with relevant parties to address the list of items that have been articulated and gather the necessary information to continue the additional analysis to determine if/how the loss of source limit for New England can be increased.

Sincerely,

Steven Ingalls

Stetson, ME

1. Interregional Study Update dated December 5, 2025:
[a02_2025_12_05_ipsac_iso_loss_of_source.pdf](#)
2. 2025 Northeastern Coordinated System Plan dated April 3, 2026:
[2026_04_03_draft_2025_northeastern_coordinated_system_plan.docx](#)
3. FERC Explainer Order 1920, 1920-A and 1920-B: [Explainer on the Transmission Planning and Cost Allocation Final Rule | Federal Energy Regulatory Commission](#)



JOHN ELIAS BALDACCI
GOVERNOR

STATE OF MAINE
EXECUTIVE DEPARTMENT
PUBLIC ADVOCATE OFFICE
112 STATE HOUSE STATION
AUGUSTA, MAINE
04333-0112

RICHARD DAVIES
PUBLIC ADVOCATE

ELECTRONICALLY FILED ON MAY 27, 2009

Karen Geraghty
Administrative Director
Public Utilities Commission
18 State House Station
Augusta, ME 04333-0018

RE: MAINE PUBLIC UTILITIES COMMISSION
Investigation of Maine Utilities' Continued Participation in ISO-NE
Docket No. 2008-156

**THIS IS A VIRTUAL DUPLICATE OF THE ORIGINAL HARDCOPY
SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH
ITS ELECTRONIC FILING INSTRUCTIONS**

Dear Ms. Geraghty,

Enclosed please find an original and one copy of the Public Advocate's Recommendation on Whether to Remain in ISO-NE in the above-referenced proceeding.

Our recommendation incorporates our comments on the Brattle Report as well as the legal issue regarding the standards that would be applied by FERC to transmission pricing mechanism for the alternative structure. Because the alternative structure developed by the Brattle Group was not an RTO arrangement, there was insufficient basis for us to develop comments with regard to legal issue # 7 identified in the April 29, 2009 procedural order.

Copies will be sent electronically to all parties on the service list.

Sincerely,

Agnes Gormley
Senior Counsel

AG/dt
Enc: OPA's Recommendation
cc: Service List



PRINTED ON RECYCLED PAPER

ELECTRONICALLY FILED ON MAY 27, 2009

**STATE OF MAINE
PUBLIC UTILITIES COMMISSION**

MAINE PUBLIC UTILITIES COMMISSION	)	PUBLIC ADVOCATE'S
	)	RECOMMENDATION ON
RE: Investigation of Maine Utilities Continued	)	WHETHER TO REMAIN
Participation in ISO-NE	)	IN ISO-NE
	)	
	)	May 27, 2009
Docket No. 2008-156	)	

**THIS IS A VIRTUAL DUPLICATE OF THE ORIGINAL HARDCOPY
SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH
ITS ELECTRONIC FILING INSTRUCTIONS**

I. INTRODUCTION

The decision to stay in ISO-NE or to initiate the process of withdrawal is not an easy one. Both options present significant risks for Maine consumers. However because we believe that the time to make a decision is now rather than later, we conclude that the better choice for Maine consumers is to remain in ISO-NE and continue to pursue the ongoing reform efforts. Our recommendation, to subject Maine to its continued role as a player who often fails to influence decisions through the NEPOOL process, is not a ringing endorsement of continued membership in ISO-NE. However, even if all of the necessary agreements and approvals were obtained to create an alternative system, the evidence does not demonstrate that any alternative system would necessarily be better for Maine or that Maine consumers would have lower electricity rates. This conclusion, together with the risks of continued regulatory uncertainty and problems of integrating renewable resources in a smaller Maine-New Brunswick market in a competitive development climate, slightly outweigh the specter of the cost of the galloping pace of transmission building in New England.

Prior to the issuance of the Commission's January 2009 Order, the Commission heard from a series of experts who opined on the major issues. The second phase of the case involved extensive participation by the Commission and the parties in reform efforts at ISO-NE. Additionally, the parties agreed that the Industrial Energy Consumer Group and Central Maine Power Company ("CMP") should commission the Brattle Group to study an alternative structure to Maine's continued ISO-NE participation. Our initial position in the case was that the ISO-NE reform option should be pursued, but cautioned that an alternative needed to be explored and developed in the event that reforms were not successful.¹ Although we cannot now state that the reforms have been successful or that there is any assurance that any more will be achieved through those efforts, the alternative to ISO-NE is sufficiently developed to persuade us to conclude that the benefits of choosing such an alternative do not outweigh the risks.

The Commission should not postpone making its decision in order to continue to gather additional information. Although all of the necessary information has not been obtained, the record in the case is voluminous and provides sufficient basis upon which the Commission may rely. Further study may better define costs for components of the alternative structure or the cost and scope of additional transmission. However the issues that continue to present the greatest uncertainties are those regarding the scope, structure and benefit of any ISO-NE alternative and those may only be known if negotiations are begun and if the proposed new systems are designed and presented to FERC and/or New Brunswick for the necessary approval and agreements. In order to proceed with such steps, the decision to leave or to stay needs to be made.² Without such a

¹ Brief of the Public Advocate November 13, 2008.

² At the May 19, 2009, technical conference in this case, Johannes Pfeifenberger, of the Brattle Group, testified that no further study was necessary but that negotiations were required in order to arrive at what an ISO-NE alternative might look like with respect to the following areas identified in the Brattle Report: market monitor; demand response integration; transmission cost allocation; marginal loss factors; board structure; transition challenges and market design.

decision those negotiating on behalf of Maine may not have the required standing to initiate the necessary proceedings or to conduct the necessary negotiations.

II. BALANCE OF ISSUES: MAINE'S RELATIVE INFLUENCE VERSUS THE UNKNOWN

The Brattle Report construct is a Maine Independent System Administrator alternative (Maine ISA) to Maine's continued participation in ISO-NE.³ The Report indicates that such an arrangement is feasible, and the costs might not be significantly higher. Given this assessment the decision of whether to leave ISO-NE or stay was extremely difficult. For us, the lure of leaving has always been related to the issue of influence. Maine's ability to influence the course of events in ISO-NE is constrained by politics and numbers. Maine does not have the votes or the load to be more than a passenger on the New England train. The result of this lack of influence has often resulted and may continue to result in decisions that have been and may continue to be very costly to Maine consumers.

While we know that dealing with ISO-NE is frustrating and unrewarding, the alternative, as proposed by the Brattle Report presents its own set of unknowns. We do not know if New Brunswick is interested in joining with Maine, or at least the record in this case does not reveal New Brunswick's views. Mr. Belcher indicated that his and the NMISA's ten-year relationship with New Brunswick has been a good one, (and that the NMISA has even been successful, on occasion with the New Brunswick regulator). It is therefore possible that New Brunswick might be interested in building upon that model. However, Northern Maine is a much smaller and thus less influential party than the proposed Maine ISA, which would have 40% of the load in such an arrangement. New Brunswick might simply say no.

³ Assessment of a Maine ISA Structure As a Possible Alternative to ISO-NE Participation, May 2009 (Brattle Report).

Another factor to consider is that while New Brunswick has taken steps towards competitive markets, the electricity system in New Brunswick remains controlled by a crown corporation, under the influence if not the control of the elected representatives of the people. The political forces that would come to bear on Maine if it entered into cross border agreements like the Maine ISA option would be very difficult to predict.

The owner of the large majority of generation in the Province is corporately related to the owner of the transmission system. Only the New Brunswick System Operator is a separate entity with its own Board. Majority ownership of both generation and transmission raises potential market power concerns.

Maine's interests and those of New Brunswick could lead to many conflicts of a different kind than those we see in New England. Finally, and importantly, resolution of those conflicts would not necessarily go to FERC; the question of who resolves conflicts could be one of the most significant issues to address in early negotiations.

These issues and more would be the substantial "intangible" unknowns of seeking to pool resources with New Brunswick. Given these uncertainties and concerns and given the lack of cost information that would support a conclusion that even if these uncertainties could be resolved in a manner favorable to Maine that there may not be cost savings in such an arrangement, our decision is to remain in ISO-NE.

III. IMPORTANCE OF CONTINUED PURSUIT OF REFORM

The choice to remain in ISO-NE highlights the importance of continuing the ongoing reform efforts. The issues that gave rise to this investigation remain of great concern and pose significant risks of increasing costs to Maine consumers. Our recommendation allows the continued commitment of the resources required to vigorously pursue these reform efforts. Inherent in any

decision to leave is the risk that Maine would be precluded from full participation in the ongoing reform efforts or that Maine's ability to influence their outcome would be less than it already is. If the alternative pursued did not result in a structure that could meet FERC approval and Maine transmission owners were not permitted to terminate their membership in ISO-NE, Maine would be faced with returning to ISO-NE and being subject to terms and conditions which would have been negotiated in reform efforts that took place without Maine's full participation.

Because the progress of the reform efforts has been exhaustively reported and is contained in the record of the case, we do not here repeat those summaries. Because the transmission cost allocation and containment negotiations have been limited to participation by NECPUC, ISO-NE and transmission owners, our efforts have been limited to the governance reform area. Our comments on those efforts are those expressed in our comments and intervention filed in the *ISO New England Order No. 719 Compliance Filing*, Docket No. ER09-1051 (May 26, 2009).

IV. ANALYSIS OF MAJOR ISSUES THAT FORM THE BASIS OF OUR DECISION

The most recent analysis of what an alternative structure to ISO-NE would comprise known as the "Maine ISA Option" is not a "ground-up" development of a new set of protocols and systems but utilizes the current infrastructure and processes in place between NMISA and New Brunswick System Operator ("NBSO").⁴ The model presents sufficient detail from which a decision can be made with respect to whether an alternative to ISO-NE is the better choice for Maine.

The Maine ISA option essentially retains NMISA's framework with respect to governance, regulatory compliance, transmission service, and reliability coordination and builds on the NBSO market structure with respect to providing imbalance energy and ancillary services in the Bangor

⁴ Proposals regarding Maine's ability to purchase "a la carte" market services from ISO-NE have been put forward as possible alternatives but have not been as extensively developed as the Maine NMISA model. The controlling legal precedent governing the "a la carte" option has been evaluated by the Commission in its January 2009 Order and further by the parties in their May 8th and 15th 2009 filings on legal issues.

Hydro Electric and CMP portions of the state (described as the “Rest of Maine” service area.)⁵ Our analysis incorporates this latest evidence and informs our recommendation.

A) Market Choice

i) Day 2 Markets are the Preferred Market Design

The importance of a market design cannot be understated. Market prices for energy and capacity account for approximately half of the all-in rates of CMP’s residential customers.⁶ Almost universally the experts in this case have voiced the opinion that a Day 2 market is more efficient and transparent. They also agree that it is preferable for purposes of integrating wind resources. In structuring the Maine ISA option, the Brattle Report states that it would be “cost-prohibitive” to implement a Day 2 market within a small market area such as Maine. Consequently the Maine ISA option is developed using a market structure based on bilateral transactions and an underlying capacity requirement.⁷

Without a Day 2 market every load serving entity attempts to find the most efficient generation mix to meet its load without a system-wide information system supplied by a market operator. Under the Maine ISA structure, market participants would submit balanced day-ahead schedules that could be revised up to 30 minutes before delivery. Because the New Brunswick market is supported by bilateral transactions, there is a lack of real-time and day-ahead hourly price signals, giving rise to issues of transparency. This pricing transparency is important to retail competition.⁸ Reserving and scheduling would also impose additional transaction costs for Maine generators.

⁵ Brattle Report at 1.

⁶ Brattle Report at 16.

⁷ Brattle Report at 46. The Brattle Report noted that NBSO’s systems are scalable to allow implementation of a day-2 market within its control area and that such a system might be cost effective. The report noted however that negotiations to implement such a market could not be completed prior to any required notice of withdrawal from ISO-NE. In addition it is not clear that the Province of New Brunswick or the NBSO would be willing to implement such a market.

⁸ Because this NBSO market design is less transparent, market monitoring and market power mitigation would be more difficult. See Brattle Report at 46-47.

Under the Maine ISA structure, balancing would be provided by the Maine ISA, with support from the NBSO, who as a central buyer, operates a balancing market that includes a market based least-cost economic dispatch of generation.⁹ This balancing service would provide energy for those deviations between actual loads and generation from the market participant's balanced schedules. Because the New Brunswick market has a limited volume, generally equal to balancing of these real-time deviations, the integration of any significant renewable resources, including wind poses challenges to maintaining adequate generation resources, as further discussed below.

The Northern Maine market functions would remain unchanged. Northern Maine would continue to obtain balancing energy from NBSO over the transmission tie lines between Northern Maine and New Brunswick.

In a Day 2 market, transmission service within the ISO region is provided as a firm transmission service with market based congestion management. In the ISO-NE market, the price for energy is reported and those reported prices generally reflect the prices at which electricity is bought and sold.¹⁰ There is no need for market participants to reserve and schedule transmission for individual source-sink transactions within the ISO.¹¹ A larger NE-ISO load area combined with minimal transaction costs and centralized dispatch arguably provides greater market efficiency. This Commission expressed this view in its January 2009 Order, noting that ISO-NE administered markets and the associated settlement functions allow for broad participation in the wholesale and retail markets region-wide and thereby enable a greater degree of competitive activity. Order at 41.

⁹ Brattle Report at 21-22 and 36-40.

¹⁰ Some prices, especially for ancillary services are known only after the fact and some reported prices are subject to revision.

¹¹ Another significant factor is that a lack of real-time and day ahead hourly price signals would increase price uncertainty and also reduce the effectiveness and attractiveness of price based demand response programs. Brattle Report at 7.

ii) Legal and Cost Impacts of Market Choice are Unclear

Separating Maine from ISO-NE and creating the Maine ISA market design creates a market seam which raises both legal and market price issues. In approving the withdrawal of two Kentucky utilities from the Midwest ISO, FERC set forth the legal standards to be applied to the proposal. FERC held that in approving the withdrawal the new arrangement must be found to be just and reasonable and not be unduly discriminatory. *Louisville Gas and Electric Company*, 114 FERC ¶61,282 (2006). FERC must approve any seam arrangement between Maine and ISO-NE.¹²

While there are no concrete estimates for possible reduction in energy, capacity or standard offer service prices under an alternative structure, the Brattle Report and many of the experts in this case opined that in the near term, costs for energy and capacity in Maine would decrease because the Maine ISA alternative could increase transaction costs for exports to ISO-NE. The Brattle report offers the caution that the export constraint created by the new seam could also serve to reduce competition and increase the risk that market power could be exercised by New Brunswick Power and Hydro Quebec, who currently have reserved almost the entire transmission capability between New Brunswick and Maine.¹³

This somewhat uncertain projection of lower short term costs is further tempered with the caution that short term lower prices could lead to longer-term trends of generation retirements and less generation investment in Maine that might offset price gains.¹⁴ After an exhaustive analysis the

¹² It is illustrative that in the *Louisville* case the agreement was for the parties to provide and facilitate network service between points of receipt and points of delivery intersecting their facilities and those of Midwest ISO and PJM at the same non-pancaked rates that were in effect prior to withdrawal. *Id.* at P 100.

¹³ Brattle Report at 9. New Brunswick Power owns approximately 85% of New Brunswick's generating capacity and controls 70% of the transmission capacity between New Brunswick and the Maine portion of ISO-NE. The remainder of the transmission capacity is controlled by Hydro-Quebec. Brattle Report at 14.

¹⁴ Brattle Report at 7. Witness Stoddard noted that short term capacity savings might be limited, pointing out that independent generation capacity could be exported to ISO-NE if the market price were higher in that market. He also noted that a ME/NB Pool would likely require a higher reserve margin to maintain the same level of reliability thereby diminishing the amount of surplus capacity in the market and thus also diminishing resulting savings. *Stoddard Direct Testimony* at 18. The Brattle Report points out that although the Maine ISA might require a higher reserve requirement a Maine /NBSO requirement might result in lower market prices for those reserves. See Brattle Report at 26.

Brattle Report concludes: “Overall, it is unclear whether the net effect of these factors would lead to a decrease in average market prices relative to the status quo.”¹⁵

The Commission agreed with most of the experts in the case that “there is no significant benefit of withdrawing from ISO-NE in terms of energy prices.” January 2009 Order at 41. The latest evidence does not provide a basis to change this conclusion.

iii) Effect of Market Design on Wind Integration and Seams

No expert has provided an estimate for the extent to which less wind might be developed in Maine because of a shift from a Day 2 energy market. However the record contains sufficient evidence to conclude that there would be significant operational challenges to any substantial wind integration in a Maine-New Brunswick region. Such challenges would create barriers to Maine’s goal to increase its renewable energy capacity in the near term.¹⁶

The evidence strongly supports the conclusion that a change to a Day 1 market without coordinated real-time dispatch would not be able to support as much wind generation. The Brattle Report notes that at the time of the report there are 1,300 MW of wind projects proposed for the state of Maine. Given that the combined peak load of Maine and New Brunswick is approximately 5,200 MW, if over 1,000 MW of wind is built in the combined New Brunswick and Maine area the region may “start to face significant operational challenges.”¹⁷

NBSO’s imbalance market does not allow for any planned (i.e. scheduled) purchases or sales. Since the New Brunswick market has limited volume the addition of additional flexible generation resources would need to be added to the system if wind resources are to grow in the

¹⁵ Brattle Report at 45.

¹⁶ Maine’s energy policy expressed by the Governor and the Legislature is to explore opportunities for and encourage the development, where appropriate, of wind energy production in the State in a manner that is consistent with all state and federal environmental standards and that achieves reliable, cost-effective, sustainable energy production on those sites in the State that will attract investment and permit the development of viable wind energy projects. The Legislature finds that the development of the wind energy potential in the State needs to be integrated into the existing energy supply and transmission systems in a way that achieves system reliability, total capital cost-effectiveness and optimum short-term and long-term benefits to Maine people. 35-A M.R.S.A. § 3402 (Maine Wind Energy Act).

¹⁷ Brattle Report at 47.

Maine-New Brunswick region.¹⁸ Illustrative is the fact that in February of 2008 NBSO implemented sanctions for intra-hour deviations from scheduled flows on the interface between NBSO and Nova Scotia. The purpose of the sanctions was to reduce the extent to which the Nova Scotia Power System Operator often made unsuccessful attempts to balance wind generation and consequently imposed a burden on the New Brunswick Market. As a consequence NBSO has invited Nova Scotia Power System Operator to work with NBSO to establish a means by which balancing services could be transacted commercially between the two balancing areas.¹⁹ A similar effort might be required to explore broader balancing and planning between Maine-New Brunswick and Maine-Maritimes if Maine continued to plan on greater development of wind resources. Alternatively Maine could pursue special arrangements with ISO-NE to upgrade transmission and dynamically schedule exports of wind generation.

These issues highlight the challenges of integrating wind resources in a smaller region that does not offer the efficiency of the RTO market. Although additional arrangements could be made to overcome some of the challenges, the uncertainties of the net cost benefit of such a system remain.

B. Transmission Planning and Cost

i) The Maine Power Reliability Program

The prospect of paying for the Maine Power Reliability Program (“MPRP”) has greatly influenced this case. Parties have been forced to assume that a large measure of the MPRP costs would increase CMP’s transmission revenue requirement, and thus find their way into either the ISO’s Regional Network Service (“RNS”) rates or into Maine ratepayers’ bills in full if we leave. CMP has pointed out that by remaining in ISO-NE, Maine’s ratepayers would shoulder a maximum of only 8.2% of the MPRP costs, and perhaps a lot less, given other mechanics of the ISO-NE

¹⁸ Brattle Report at 47.

¹⁹ Brattle Report at 48.

ratemaking process. If Maine pulls out of ISO-NE, CMP and others repeatedly state that CMP's ratepayers would pay for the entire project. Thus the MPRP has been a sort of fulcrum upon which this case is balanced.

With the filing of the Brattle Report, this issue became less black and white. According to the analysis in the Brattle Report, under the Maine ISA arrangement Maine ratepayers might not be required to shoulder the entire MPRP burden given that some undetermined amount could be paid by generators seeking transmission service through or out of Maine, or through a seams agreement with ISO-NE that includes a cost sharing agreement. The Brattle Report attempted to quantify this effect. Under various assumptions about how much transmission is built in the rest of New England, and assuming Maine ratepayers would pay for all of the MPRP under the Maine ISA option, the Brattle Report indicated that if up to 45% of BHE and CMP's combined transmission revenue requirement could be allocated to ISO-NE and others through various cost sharing agreements, then the projected 2012 transmission rate for Maine ISA customers would not exceed 2012 transmission charges under continued ISO-NE participation.

The unanswered question, therefore, is whether seams agreements or through and out charges in connection with the Maine ISA option could be arranged and provide sufficient transmission revenue. This is yet another risk associated with leaving ISO-NE, and one that cannot be answered without first choosing to leave.

ii) Risks of Increased Transmission Costs- In or Out of ISO-NE

The costs of bulk transmission are socialized to all New England ratepayers by ISO-NE through the RNS tariff. Thus at any given point some New England ratepayers are paying for more transmission than is owned by their native utility and some are paying for less.²⁰ By remaining in

²⁰ The issue of what continuing obligations CMP and BHE would have (if any) upon leaving ISO-NE and what obligations (if any) remaining ISO-NE members would have to continue paying for BHE and CMP transmission upgrades, has been addressed in the May 8 and May 15, 2009 filings in this case.

ISO-NE, even assuming the MPRP is built and socialized, Maine ratepayers will be exposed to the costs of the many projects that are or may be put into the ISO-NE transmission queue. This factor poses the greatest risk in remaining in ISO-NE. It cannot be too often stated that there are many significant factors that serve as powerful incentives to transmission building: the current method of “socializing costs” lessens individual states’ incentives to reduce costs; ISO-NE’s focus on development of transmission rather than transmission alternatives; and Federal policy implemented through FERC incentive adders for RTO membership and transmission building, all contribute to the increase in the construction and cost of transmission building. If the reform efforts in this area do not result in significant changes to the current methodologies, and the choice is made to continue Maine’s membership in ISO-NE for the period of a renewed transmission agreement, Maine may need to revisit its participation in ISO-NE at a future date.

The Maine-ISA option outlined in the Brattle Report would provide that a portion of the Rest of Maine transmission revenue requirement would be recovered from through and out charges into Southern New England and (to a much lesser extent) to New Brunswick. While this methodology would help offset transmission costs for Maine ratepayers, it would create “pancaked” transmission charges for a new seam that would be created between Maine and ISO-NE that may not, as discussed above, be acceptable to FERC. At the same time, according to the Brattle Report, the new wheeling out charge could reduce the volume of exports to Southern New England, which would create a risk of reduced wheeling-through and wheeling out revenues. According to the Brattle Report this risk of reduced revenues is significant. Ultimately this would increase the transmission costs paid by customers in Maine.²¹

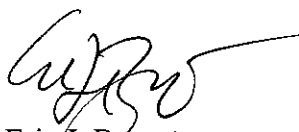
²¹ Brattle Report at 32.

V. CONCLUSION

We make our recommendation to stay in ISO-NE based in part on an expectation that the reform efforts will produce some measure of success that results in greater cost containment than the present system. If the Commission weighs the options and chooses to order that Maine's transmission owners renew their agreements to remain in ISO-NE, we strongly recommend that any such order require the transmission owners to continue the ongoing reform efforts in a manner consistent with the goals expressed in the Commission's January 2009 order.

Respectfully submitted,


Agnes Gormley
Senior Counsel


Eric J. Bryant
Senior Counsel

Response to Maine Department of Energy Resources 2027 Maine Energy Plan – Request for Information

Submitted by: Summit Natural Gas of Maine (SNGME)

Date: April 27, 2026

Summit Natural Gas of Maine, Inc. (SNGME) appreciates the opportunity to respond to the Maine Department of Energy Resources' Request for Information for the 2027 Maine Energy Plan.

The core objectives of the 2025 Plan—affordability, reliability, clean energy advancement, efficiency, and workforce development—remain sound. However, they require important clarification and recalibration. The next Energy Plan should build on the analytical rigor of *Maine Pathways to 2040* while correcting several structural omissions that risk higher costs, reliability shortfalls, and inequitable outcomes, particularly for Maine households and businesses facing high winter energy burdens.

Specifically, the 2027 Energy Plan should:

- Include energy affordability as a significant objective, both in the short and long-term;
- Preserve customer energy choice, consistent with Maine statute and legislative direction;
- Explicitly value winter reliability, fuel security, and peak performance;
- Recognize natural gas and renewable natural gas (RNG) as essential, complementary cleaner energy resources;
- Adopt a technology-neutral framework that values emissions reductions wherever they occur;
- Support additional natural gas expansion into and throughout the region as a means of reducing costs, emissions, and volatility.

Failure to address these issues risks locking Maine into a higher-cost, higher-risk pathway that undermines both climate and affordability goals. The reality is that we need a portfolio-based strategy that preserves fuel diversity rather than prematurely narrowing options.

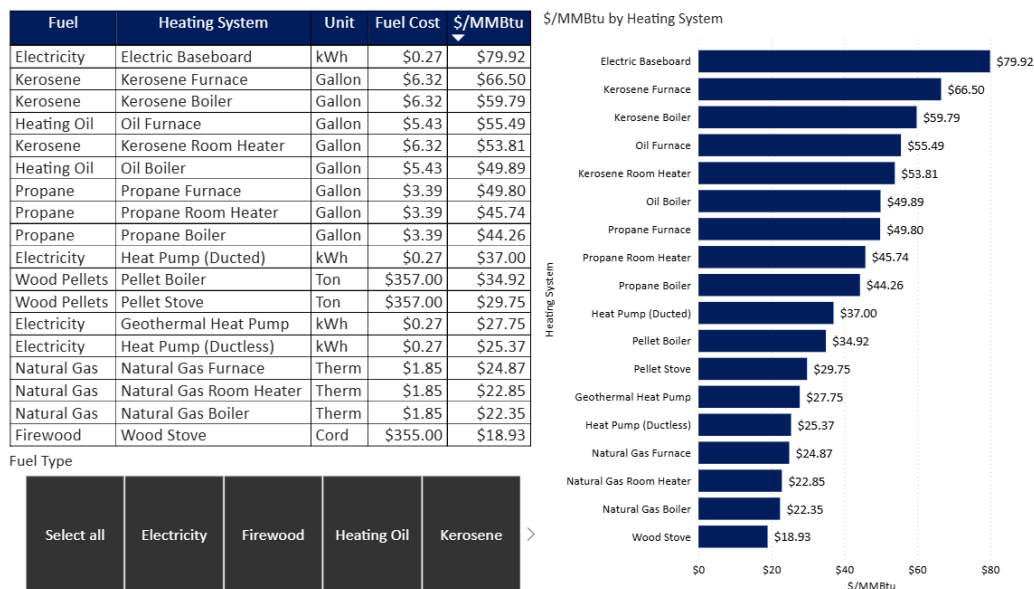
I. Affordability

As noted by the first Maine Climate Council meeting in 2026, “rising costs and affordability pressures” is the most cited concern as Maine moves forward in 2026 with its Maine Won't Wait plan.¹ Notably, natural gas can help address such affordability concerns as it remains one of the lowest-cost heating options available in Maine, second only to firewood.²

¹ [Maine Won't Wait](#)

² [Heating Fuel Prices | Maine Department of Energy Resources](#) (as of April 27, 2026)

Figure 1



With residential electric rates at over 30 cents per kWh, Maine's residential electric rates are among the highest in the nation with more than half related to delivery charges.³

Figure 2

From EIA Table 5.6.A	
Residential Rates (cent/kWh)	
State	Feb-26
Hawaii	43
California	33.22
Maine	32.17
Connecticut	30.77
Massachusetts	30.46
New York	29.99
Rhode Island	29.45
New Hampshire	26.52

Just the delivery charges are higher than the average residential electric rate for the United States of approximately 17.5 cents per kWh. These costs are not expected to decrease. In fact, ISO-NE forecasts that by 2050, the transmission costs alone will increase by approximately \$16 - \$26 billion.⁴ In its rate case request, Central Maine Power Company (CMP) proposed that for its distribution system, it would need to

³ [Residential Electric Rates | MPUC](#)

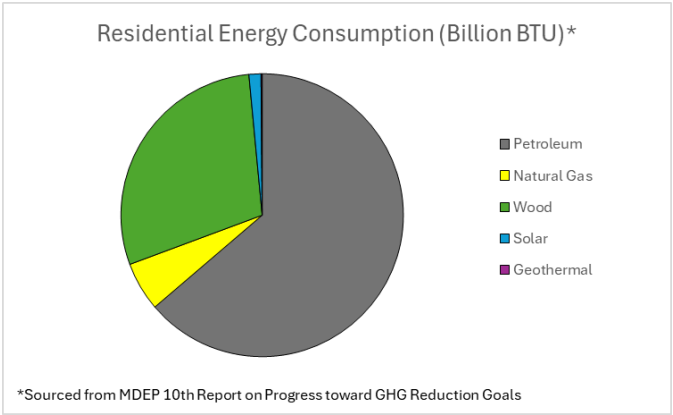
⁴ [2024_02_14_pac_2050_transmission_study_final.pdf](#)

raise rates by approximately \$400 - \$450 million over five years.⁵ Accordingly, the affordability of natural gas relative to electricity is likely to only improve. Policies that restrict gas availability risk forcing customers into higher-cost alternatives, increasing energy insecurity. Moreover, additional natural gas pipeline capacity into New England would lower costs for both natural gas customers and the electric grid.

II. NG AS A CLEANER RESOURCE

According to the most recent Maine Department of Environmental Protection Report on Progress toward GHG Reduction Goals, energy accounts for approximately 94% of Maine’s GHG emissions⁶ and Maine remains the most heating-oil-dependent state in the nation. As demonstrated in that report, petroleum usage still represents by far the most relied upon energy source for residential customers.

Figure 3



Natural gas, which has significantly lower emissions than delivered fuels or even electricity, is an under-utilized fuel. According to EIA, heating fuel produces approximately 40% more CO₂/MMBTU than natural gas.⁷ Switching households from oil or propane to natural gas would yield immediate and measurable CO₂ reductions. Even compared to electricity, natural gas can provide meaningful emission savings.

Figure 4

Heating Fuel Emission Comparison (Pounds of CO ₂ per Million BTUs)	
Natural Gas	117
Home Heating Fuel	163
Propane	139
ISO-NE Marginal Emissions ⁸	263 – 303

⁵ After push-back from the Public Utilities Commission, CMP revised its request to only seeking approval of the first year of the request for a \$188 - \$198 million rate increase.

⁶ [Maine Department of Environmental Protection 10th Report on Progress toward GHG Reduction Goals, June 2024](#)

⁷ [US Energy Information Administration Carbon Dioxide Emissions Coefficients, Released September 18, 2024](#)

⁸ Base on the range of marginal emission rates averaged over March thru November for 2018 – 2024. [ISO-NE Electric Generator Air Emission Reports](#). Pounds per MWh converted to pounds per MMBTU: 898lb/MWh = 263 lb/MMBTU; 1035 lb/MWh = 303 lb/MMBTU

Finally, supporting Renewable Natural Gas (RNG) provides further opportunities to create emission reductions while leveraging existing infrastructure. Incorporating additional RNG into the natural gas system would provide a “have-our-cake-and-eat-it-too” opportunity to support a clean energy resource that is more affordable than large-scale infrastructure replacement and avoids potential stranded investment while preserving all of the reliability and other benefits that natural gas can provide.

Supporting access to natural gas could encourage homes with old, significantly less efficient oil boilers and furnaces to replace them with new, highly efficient natural gas systems that achieve 90 – 98% efficiency, thus significantly lowering emissions in Maine both through higher combustion efficiencies and by eliminating the emissions associated with delivering heating fuels with trucks.

Accordingly, efficiency policies should remain fuel-neutral, focusing on outcomes rather than mandates.

III. RELIABILITY

Maine’s energy planning must explicitly address:

- Cold-weather performance limits of electrified heating.
- The continuing need for dispatchable, on-demand energy during winter peaks.
- Fuel resilience across multi-day extreme weather events.

Natural gas delivery systems are less vulnerable to weather disruptions than overhead electric infrastructure and provide seasonal and intra-seasonal energy storage that batteries cannot replicate affordably at scale. Moreover, it is not reliant on road conditions that affect delivered fuels.

Winter peak risk is growing faster than energy efficiency gains. According to ISO New England’s annual Forecast Report of Capacity, Energy, Loads, and Transmission (CELT Report), the region’s annual electricity consumption will increase by about 11% over the next decade.⁹ In addition, with the increased supply from solar, “duck curve” conditions are becoming more common.¹⁰ Increasing the use of natural gas for heating could help mitigate this issue, by smoothing the electricity demand and thereby improving grid reliability.

Maine has the highest rate of residential heating oil usage in the United States, with roughly 50% to over 60% of households relying on it as their primary heat source. While usage has declined from a high of 70% in 2010, Maine still leads the nation in per capita consumption. The state’s reliance is driven by a combination of colder climates and limited access to natural gas pipelines.

As Maine’s Climate Action Plan is updated this is the opportunity to evolve into greater consideration of rural and economic disparity along with grid reliability and cost. This is a time to take a closer look at electrification and the practical implication for rural Maine due to high costs, poverty, and limited grid capacity, placing undue burdens on lower-income households.

⁹ [Go Deeper: 2025 CELT Report - ISO Newswire](#)

¹⁰ [New England Grid Records 100th “Duck Curve” Day | American Public Power Association](#)

Summit Natural Gas of Maine and Peaks Renewables remain committed to being part of the proactive and pragmatic solution for energy challenges.

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

April 27, 2026

RE: Public Comment in Response to 2027 Maine Energy Plan Request for Information

Dear Acting Commissioner Burgess,

The Nature Conservancy in Maine would like to voice our support for the work that the Department is putting into the 2027 Energy Plan with the objective of meeting our state goals of 100% clean energy, with at least 90% coming from renewable resources, by 2040. TNC would recommend stronger environmental standards to encourage the development of clean energy infrastructure on already disturbed areas, including incentives for developing on brownfields and previously contaminated lands.

TNC understands that almost all states and utilities undertake long-range planning to inform decisions about where and what kind of electric generation, transmission, and grid investments to make. But these planning processes often do not consider impacts to natural habitats and wildlife. When nature is missing from the planning process, development may be proposed in places that creates conflict, and each year of delay in deploying zero-carbon electricity generation and transmission makes it harder and more expensive for us to achieve a sustainable climate future. By including nature in the planning process, Maine can reach our state goals of 100% clean energy by 2040 while limiting impacts to natural lands.

Building out renewable energy in low-impact areas—lands that have already been significantly altered for agriculture, infrastructure, and other development activities—provides an opportunity to avoid conflicts and accelerate the clean energy transition. This approach can increase local benefits for communities, reduce wildlife impacts, and avoid converting forests and other natural lands for project development.

Additionally, TNC would like to address several of the Questions of Interest posed by the Department in the RFI.

Part 1: Engaging in Maine's Energy Plan

- A. We recommend place-based engagement in regions facing the most energy and climate vulnerability, such as coastal communities and rural inland counties. Additionally, TNC would suggest partnerships with trusted local organizations such as Community Action Agencies, and land trusts (to better understand local conservation priorities and

concerns), among other community groups. We would also recommend a mix of both in-person and virtual engagement options to make these meetings accessible to as many people as possible.

- B. TNC would suggest that DOER should consider additional outreach in regions of Maine facing unique grid constraints, such as the Downeast region and northern Maine. We would also recommend tailored outreach to island and coastal communities due to concerns about climate and energy resilience. Lastly, we recommend focusing engagement on areas of the state that are likely to see major development of renewable energy or serve as host communities for large scale generation and distribution infrastructure.
- C. Yes, The Nature Conservancy is interested in participating in stakeholder meetings (virtual or in-person), and/ or small group discussions, such as topic specific workshops (i.e. renewable siting, resilience, nature-based solutions)
- D. Some topics we'd like to see covered in public meetings or workshops include renewable energy siting and land-use compatibility, grid modernization and resilience, and community benefits and equity. TNC understands that many communities struggle with where to start when negotiating a community benefits agreement with developers, and any work the Department can do to help municipalities and communities understand the process and potential outcomes would be helpful in getting renewable energy projects successfully built.
- E. When it comes to engaging socially vulnerable communities, as defined in 35-A M.R.S.A. §3210-I (1) (D)¹ TNC would recommend compensating community members for participation where possible and partnering with local service providers. Additionally, we support using the Maine Social Vulnerability Index² (MSVI) as a starting point, as DOER states, but recommend supplementing this information with Tribal consultation and local knowledge.

Part 2: Maine's Energy Landscape

- A. The most consequential shifts in 2025/2026 include changes to federal incentives from the IRA and IIJA that were aimed at accelerating clean energy deployment as well as federal changes around planned offshore wind projects. Additionally, conversations surrounding the development of data centers has caused concern about electricity prices and other resource intensive impacts from potential development. Lastly, LD 1868 from 2025 changed the state's renewable energy goal to a goal of 100% clean energy by 2040 (at *least* 90% "renewable", at *most* 10% "clean"). Other international events have driven up energy prices, demonstrating the need to transition away from fossil fuels to clean and renewable Maine-based methods of energy generation, such as wind and solar.

¹ "For the purposes of this paragraph, "socially vulnerable counties and communities" means those counties and communities in the State containing populations that are disproportionately burdened by existing social inequities or lack the capacity to withstand new or worsening burdens;"

² https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/SVI%20Communities%20Map_List_2024.08.14_1.pdf

- B. Some important near-term impacts from these changes that should be addressed through this Energy Plan are potential pathways to achieve the state's 100% clean energy by 2040 goal now that the offshore wind industry faces uncertainty and federal investment in clean and renewable energy has diminished. Additionally, it is important that the Energy Plan for the next three years explore a potential build-out of data centers and associated impacts on both grid reliability and on ratepayer costs.
- C. N/A
- D. TNC supports increased investment in targeted incentives, community energy planning, and resilience hubs to support socially vulnerable communities.

Part 3: Updating the Objectives of the Maine Energy Plan

- A. TNC sees the objectives (a. Deliver affordable energy for Maine people and businesses, b. Ensure Maine's energy systems are reliable and resilient in the face of growing challenges, c. Responsibly advance clean energy, d. Deploy efficient technologies to reduce energy costs, and e. Expand clean energy career opportunities for Maine people and advance innovation) from the 2025 Energy Plan as still being relevant, but would recommend increasing focus on nature-compatible, low-impact renewable energy siting, equity and environmental justice with special attention towards energy affordability, climate resilience and adaptation, and transmission planning that is aligned with conservation priorities.
- B. While TNC does not disagree with the data and analyses from the 2025 Energy Plan, it is notable that there is hardly any mention of responsible siting of renewable energy resources and grid infrastructure. Strategy D in the 2025 report does identify the need to "balance other state natural resource, wildlife, and planning priorities", but there is no mention of prioritizing brownfields, already contaminated lands, and previously developed areas for siting of clean and renewable energy projects. We would like to see these principles incorporated throughout the 2027 plan so that Maine can meet our clean energy goals without compromising the natural areas and biodiversity of our state.

Part 4: Specific Questions regarding the Objectives of the Maine Energy Plan

- Objective A, Question 6.c. The Nature Conservancy understands that the expansion of projected renewable energy build-out globally is expected to be a major driver of land-use change worldwide. Utility scale onshore wind and solar energy projects are expected to make up the majority of new generation, and these projects, and related transmission infrastructure, require large areas for development. TNC would like to see the DOER prioritize low-impact areas for clean energy development —lands that have already been significantly altered for agriculture, infrastructure, and other development activities— that also have high renewable energy development potential. For example, prioritizing distributed energy resources, such as rooftop solar, and utility scale wind and solar on altered and converted lands over projects on natural lands. There are benefits of developing renewable energy in low-impact areas, including local economic benefits,

lower potential for conflicts that can lead to costly delays, climate change mitigation by avoiding forest conversion, and more.³

- Objective C Question 1: There should be mechanisms in place to ensure that the projects that are selected through competitive solicitations from the State are actually built within the proposed timeline. There have been several instances of projects being selected and then not being built for a variety of reasons, but the time state employees spend evaluating these projects is valuable, and we would like to see that work result in successfully built projects to help us meet our statewide clean and renewable energy goals. Additionally, we would like to see the Department prioritize objective D under section 10313, which states that “the department shall conduct competitive solicitation under this section in a manner consistent with the following objectives: d. To minimize the impact of energy generation on the environment of the State”⁴ by prioritizing projects that are sited on disturbed lands, and “F. to avoid or minimize the curtailment of other renewable or clean resources”⁵ by prioritizing projects that are co-located with energy storage projects.
- Objective C Question 2: We recommend learning from constructed and operational offshore wind projects to fill critical knowledge gaps related to OSW data and research. There is a need to address the intersection of clean energy and biodiversity goals and TNC is in favor of financial incentives for all new clean energy infrastructure projects that are nature-friendly and biodiversity-positive. TNC has developed the [Marine Mapping Tool](#)⁶ to assess marine life and habitats based on publicly available data. The map provides a quantitative summary of the species and habitats found within a particular site, as well as regional and temporal context to help better interpret the results.
- Objective C Question 4 d: TNC understands that all energy sources have impacts and tradeoffs. Hydropower may be lower carbon than other sources, but dams have major impacts to rivers and freshwater ecosystems. Since 1970, freshwater biodiversity worldwide has declined by 84%. Dams are a major factor in this decline, as they disrupt fish migration, damage floodplains and wetlands, and affect freshwater sediment and temperature regimes. As with all energy siting issues, TNC approaches hydropower using the avoid, minimize, mitigate framework: Avoid impacts by preventing new dams from being built in critical aquatic systems; minimize impacts of existing infrastructure with fish passage structures and more sustainable operating plans; and mitigate biodiversity losses by removing the most detrimental dams and deploying on-site or off-site environmental restoration.
- Objective C Question 7: The linear nature of transmission infrastructure necessitates more robust community engagement to ensure all voices are heard, disadvantaged communities are not disproportionately impacted, and natural areas are not fragmented

³ https://www.nature.org/content/dam/tnc/nature/en/documents/TNC_CleanAndGreen_FullReport_050520.pdf

⁴ 35-A M.R.S.A. §10313

⁵ Ibid.

⁶ <https://www.maps.tnc.org/marinemap/#/>

in a way that harms biodiversity and habitat connectivity. TNC would like to see grid infrastructure co-located with existing linear infrastructure (such as roads and pre-existing transmission corridors) wherever possible.

- Objective E Question 7: TNC would recommend investing in specific training for first responders related to battery fires. While battery fires are rare, ensuring emergency response professionals are educated about how to respond to battery fires (from electric vehicles, in homes, or larger grid scale battery energy storage facilities) is an important step in ensuring communities feel safe adopting this technology in to their lives and hosting these projects in their towns. Investment in this area will also demonstrate to Mainers that the state hears their concerns and is committed to ensuring safety for all as we transition to a future powered by 100% clean and renewable energy.

Part 5: Additional Considerations

1. While the statutory requirements don't explicitly state that the Department must consider responsible siting of energy generation and grid infrastructure projects, it does require that the Plan be developed with consideration of the state climate action plan, Maine Won't Wait. Land conversion concerns and forest carbon sequestration are included in the climate action plan, and it is reasonable for the department to incorporate responsible siting into the evaluation criteria and across the larger state energy plan.
2. Maine can lead the nation in nature-positive clean energy by engaging in early planning and public input to reduce conflict, cost, and ecological impact.

Thank you for the opportunity to provide input, we look forward to engaging in future opportunities for stakeholder input.

Sincerely,

A handwritten signature in black ink that reads "Karen Blakelock". The signature is written in a cursive, flowing style.

Karen Blakelock

Policy Advisor
The Nature Conservancy
Brunswick, Maine

From: [Fran Turner](#)
To: [DOER](#)
Subject: Energy Plan RFI
Date: Sunday, April 26, 2026 12:59:26 PM

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.

Hello,

I have one item of comment for the 2027 energy plan.

1. Remove Sears Island from any energy planning agenda.

Rationale:

1. Sears Island has unique ecological significance to the region
2. Sears Island has direct and indirect economic impact to the region
3. Developing Sears Island for energy (such as the off shore wind port) is unnecessary, as there are other viable options.
4. Developing Sears Island will have a negative impact on the ecology and economy of the region.
5. Preserving the largest uninhabited causeway accessed island on the east coast is the right thing to do, and aligns with the values of Maine.
6. Sears Island is much loved by the community. A lot of time and energy and expense will be incurred by the State trying to develop it faced with community opposition. A choice supported by the community will ultimately be more successful.

Thank you
Fran Turner
Belfast Maine



April 28, 2026

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

RE: 2027 Maine Energy Plan

Dear Acting Commissioner Cunningham:

Versant Power thanks the Maine Department of Energy Resources for the opportunity to offer feedback during development of the next Maine Energy Plan.

Part 1: Engaging in Maine's Energy Plan

Versant Power recommends engaging and soliciting feedback from groups in northern and eastern Maine whose work requires focus on electricity- and energy-related issues, particularly communities that may be considered disadvantaged. The distinct geographic and socioeconomic conditions in these regions affect energy perspectives which should be taken into account when planning for the state as a whole.

Groups may include:

- Community and Wabanaki Nation sustainability groups
- Areas on Aging and Community Action Programs
- Aroostook Energy Association
- Island Institute
- Versant Power's Planning Advisory Group (Maine Public District)

Versant recommends providing community members with a clear overview of the Energy Plan's specific goals, as well as specific tools that may be used to meet those goals, to provide a shared understanding and garner relevant feedback. Providing a post-discussion survey also can help measure understanding and effectiveness.

Policy and regulatory changes continue to have direct impacts on customers' bills and their relationships with their utilities. Versant observes that it is becoming more and more difficult for customers to navigate the complex web of interests related to the generation and delivery of energy services. Versant believes



that energy literacy is vital to empower customers to make good choices for their households and businesses.

Parts 2 & 3: Maine's Energy Landscape and Objectives of the Maine Energy Plan

Versant recognizes and agrees that our state's energy future will require improvements to the grid, including replacement of aging infrastructure and integration of new technologies. Work to meet modern customer expectations and facilitate increased self-generation will also require investment as we expand our suite of services and rebuild the grid to allow more two-way flow of electricity, a purpose for which the original electric grid was not built. As the most rural state in the nation, Maine has the fewest number of customers among whom to spread relatively fixed costs of maintaining and improving the grid.

When navigating our journey to carbon-free energy, Versant welcomes the opportunity to partner with the state to ensure transmission and distribution investments help us meet its goals and allow the flow of renewable energy to appropriate markets while meeting our customers' expectations for service quality. This effort will require careful planning across all energy sectors to keep electricity affordable while maintaining safety and reliability.

Versant also would like to clarify that the Company currently recovers its prudently incurred storm costs through distribution rates; storm costs are not included in stranded cost or public policy charges for Versant customers.

Part 4

Objective B: Ensure Maine's Energy Systems are Reliable and Resilient

Versant recommends that DOER reference Docket No. 2025-00343, which addresses similar themes related to reliability and resilience and includes relevant stakeholder input. Versant also encourages DOER to consider our recent comments on the energy storage RFP, particularly regarding battery energy storage systems (BESS), including utility-owned BESS. These resources can play a critical role in ensuring reliability and resiliency, provided their benefits are properly assessed, valued and realized within system planning and operations.

Objective C: Responsibly Advance Clean Energy

DOER should consider total system impacts, including the constraints and costs associated with safely and reliably interconnecting generation resources. Maine's distribution system, particularly in rural areas, already hosts very significant amounts of distributed energy resources (DER) often without alignment to



local load demand. Facilitating the deployment of additional renewable generation in a least-cost manner will require careful coordination, siting and planning to minimize interconnection costs, optimize use of existing grid capacity, and align resources with both locational and temporal load-serving needs.

Additionally, as highlighted in recent NERC Reliability Issues Steering Committee (RISC) reports, rapid policy-driven grid transformation is an increasing source of reliability risk. DOER should evaluate all proposed technologies and policy approaches based on their total system benefits, risks and level of maturity. Versant emphasizes that reliability must remain a tantamount requirement as energy transitions continue.

DOER should ensure that all solutions are evaluated with appropriate weighting of reliability impacts and risks, and that the pace and scale of grid transformation are managed in a manner that maintains safe and reliable system operations.

Objective D: Deploy Efficiency Technologies to Reduce Energy Costs

DOER should carefully consider the operational and planning impacts of increasing load flexibility on the electric system. Realizing the full benefits of load flexibility resources will require strong coordination with utilities and a clear understanding of system constraints. Many load flexibility solutions will require utility visibility, coordination and, in some cases, control to ensure safe and reliable operation and to ensure potential benefits are maximally realized. Advanced systems such as Advanced Distribution Management Systems (ADMS) and Distributed Energy Resource Management Systems (DERMS) will be critical to enabling these capabilities at scale and realizing the full value stack.

DOER also should consider the impacts of existing DER penetration, particularly solar, including generation profiles and inherent limitations on an already highly saturated distribution system. Encouraging or requiring co-located energy storage for DER solar installations could improve utilization of existing infrastructure, enhance operational flexibility, and better align generation with system needs, particularly if coordinated through utility platforms such as ADMS and DERMS.

Objective E: Expand Clean Energy Opportunities.

DOER should recognize the critical role of Maine's electric utilities as primary employers and workforce developers within the energy sector. Utilities will play a central role in implementing the clean energy transition and should be a key focus in workforce development strategies.



Versant's internship program is intentionally aligned to high-growth segments highlighted in the report – including energy efficiency, renewable generation and grid modernization – by targeting disciplines such as electrical engineering, IT, cybersecurity and project management. The Company leverages internships as a primary entry point into the organization, creating a structured pathway from education to full-time employment and helping address workforce gaps in critical technical roles.

Partnerships with technical schools across the state directly support the report's emphasis on expanding workforce training and experiential learning opportunities, particularly for roles with lower barriers to entry like energy efficiency and solar. These partnerships allow us to engage talent early, influence skill development, and align training with evolving industry needs. By collaborating with vocational and technical institutions, we are helping broaden access to careers and supporting increased workforce participation across diverse talent pools.

Versant has also expanded its workforce to meet the demands of rapid industry change and evolving state requirements, creating family-supporting careers directly aligned with Maine's clean energy goals.

Yours truly,

Judy Long, Senior Manager, Communications & Brand

YemanCompany LLC

Response to Maine Energy Plan 2027 RFI

Prepared for: Maine Department of Energy Resources

(DOER) Date: April 2026

Executive Summary

YemanCompany LLC is a Maine-based solar service provider specializing in installation, maintenance, cleaning and performance optimization. Based on field experience, we identify critical gaps in affordability, system reliability, and post-installation maintenance that directly impact long-term energy outcomes in Maine.

1. Stakeholder Engagement

Hybrid engagement models, digital platforms, and inclusion of vulnerable communities using data-driven approaches.

2. Energy Landscape Analysis

Energy price volatility, electrification trends, and infrastructure gaps require urgent coordinated investments.

In practice, solar adoption is limited not only by cost but by lack of maintenance infrastructure and customer awareness. Many installed systems underperform due to insufficient cleaning and monitoring, reducing expected returns.

3. Strategic Objectives Update

Enhance resilience, affordability, and innovation in alignment with evolving market conditions.

State-backed **solar financing programs** Incentives for **maintenance services** (not just installation) Support for **low-income households**

4. Affordable Energy (Objective A)

Deploy distributed solar, storage systems, and targeted subsidies to reduce energy burden.

Create **solar-as-a-service models** (monthly payment instead of upfront cost)

Subsidize **system maintenance and cleaning**, not only installation

Introduce **performance-based incentives** (pay for energy output)

5. Reliability & Resilience (Objective B)

Invest in smart grids, underground lines, and AI-based outage prediction systems.

Distributed solar combined with battery storage can reduce outage impacts, particularly in rural areas. However, system reliability depends heavily on regular maintenance, which is currently underdeveloped in Maine.

6. Clean Energy Development (Objective C)

Accelerate solar, offshore wind, and explore advanced nuclear and long-duration storage.

Maine should prioritize **distributed solar over centralized only**

Encourage **local installers**, instead of only large developers

Policies should prioritize distributed solar deployment through local businesses to ensure economic benefits remain within Maine communities while accelerating adoption.

7. Energy Efficiency (Objective D)

Expand EV infrastructure, heat pumps, and demand-side management technologies. Projection 2030

8. Workforce & Innovation (Objective E)

Develop training programs, innovation hubs, and public-private partnerships. Partnerships with local businesses

Maine faces a shortage of skilled solar technicians, particularly in installation and maintenance. Supporting small businesses to participate in training programs can rapidly scale workforce capacity.

9. Financial Strategy

Estimated investment: \$150M–\$300M across infrastructure, technology, and workforce programs.

Budget Overview (Indicative)

Renewable Energy Projects	\$100M
Grid Modernization	\$80M
Energy Storage	\$50M
Workforce Development	\$20M
Innovation & R&D	\$30M

Conclusion

YemanCompany LLC is well-positioned to support Maine's energy transition through solar deployment, maintenance services, and workforce development partnerships.

From: [Kim Yesis](#)
To: [DOER](#)
Subject: Energy Plan RFI
Date: Friday, April 24, 2026 8:13:28 AM

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In Searsport, Mack Point should be given preference over Sears Island for port development .Protect Sears Island as the refuge and natural point of attraction it has become.

PERIOD.

Kim and Peter Yesis
Searsport.