

From: [Vigue, Afton](#)
To: [Strait, Kelly](#); [Tremblay, Ethan](#); [Cunningham, Celina](#)
Subject: FW: Comments Front-of-the-Meter Distributed Energy Resources Draft Program Proposal
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From: Runte, Gerry <Gerry.Runte@legislature.maine.gov>
Sent: Saturday, August 29, 2026 11:10 AM
To: DOER <DOER@maine.gov>
Subject: Comments Front-of-the-Meter Distributed Energy Resources Draft Program Proposal

Commissioner Cunningham and DOER staff:

The Front-of-the-Meter DER Program Proposal draft represents a major step forward not just in procurement but also in how we better plan the future grid. Its Distribution System Services (DSS) concept recognizes that a DER's value can vary substantially depending on where it is located, when it operates, and what grid need it addresses. It also recognizes that DERs can contribute to demand flexibility.

I recommend considering the following changes in the final version.

How Integrated Grid Plans and DER procurements interconnect needs to be defined. It's true these two processes can't simply be sequential, but they also can't be fully concurrent because IGPs and procurements are on very different time cycles. The final proposal should specify how these two cycles connect rather than treat that connection as a detail to be worked out later. What outputs from the IGPs need to flow directly to each procurement and how often should that data be updated between the longer IGP cycles? How might procurement results get fed back into the next IGP and the utility capital plans to avoid the two processes operating as separate initiatives? The latter is particularly important to assure ratepayers don't pay twice: once for the DER service meant to avoid an investment, and again for substantially the same investment later.

Develop actionable distribution-system information. DSS requires far more granularity than today's planning processes generally provide: feeder and substation forecasts, timing and duration of constraints, hosting capacity, expected conventional investment costs, operational requirements, and the value of deferral. The final proposal should identify the data, analytical capabilities, and utility planning practices needed to produce that information, and set a schedule for developing them. This data needs to be transparent and independently reviewable.

Address the relationship between procurement design and utility incentives. A mature DSS

program will eventually need to address whether utilities should be financially indifferent or potentially rewarded when a competitively procured DER or other non-wires solution outperforms a traditional investment in terms of ratepayer outcomes.

Move toward resource-neutral procurement. A future DSS market should treat generation, storage, load flexibility, and other technologies alike when they can provide the same measurable service at lower cost.

Clarify the long-term relationship between the program's two parts. The Standard Offer Block may be a sensible bridge, since it can run on existing systems and gives developers a reasonably predictable revenue stream, but shouldn't become an end in itself. Part 1 should be the bridge; Part 2, the destination. Standard Block procurements should therefore consider shorter terms than 20 years and allow for Part 2 to eclipse that program.

The benefit-cost analysis should capture more than an estimated avoided distribution cost at contract signing. It should also establish a process to verify that the anticipated investment was deferred or avoided and to reconcile those results with future IGPs and utility rate cases.

This program's real opportunity lies in providing a missing link between IGPs and investment decisions. Its success should ultimately be measured by whether the resources it develops enable Maine to run the existing grid more efficiently, avoid unnecessary investment, improve reliability, and deliver lower long-term costs to ratepayers, rather than just the number of megawatts of DER projects it produces.

Thank you for considering these comments.

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These email exchanges are part of the public record.