PUBLIC COMMENT

Maine Department of Energy Resources
Draft Request for Proposals for Energy Storage Projects
Pursuant to 35-A M.R.S. §10313

Submitted by:
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Introduction

The following comments are submitted in response to the Maine Department of Energy Resources (DOER) draft Request for Proposals for Energy Storage Projects, released March 27, 2026[1] pursuant to 35-A M.R.S. §10313, established by Public Law 2025 Chapter 476 (LD 1270).[2] These comments are offered in the spirit of strengthening the final RFP to ensure that Maine's energy storage procurement achieves its statutory objectives while remaining accessible to a broad range of developers and beneficial to all Maine ratepayers, including those in rural and underserved communities.

These comments address four strategic areas where the draft RFP, as currently written, may inadvertently create barriers to participation or leave gaps in Maine's energy storage incentive landscape: (1) the ISO-NE cluster study timeline and distribution interconnection eligibility; (2) the unaddressed gap in incentives for community-scale, multi-business demand aggregation projects; (3) the balance of ratepayer and community benefit protections relative to utility and developer obligations; and (4) the minimum project size threshold and its impact on developer accessibility.

These comments are prepared by Jason Masters, Energy Engineer for Ground Floor Energy, and draw on direct experience developing battery energy storage projects in Maine, navigating the interconnection processes of Central Maine Power (CMP) and ISO New England, and working with commercial customers on demand reduction

[1] Maine Department of Energy Resources, Draft Request for Proposals for Energy Storage Projects Pursuant to 35-A M.R.S. §10313, released March 27, 2026. Available at https://www.maine.gov/energy/.

[2] 35-A M.R.S. §10313, enacted by Public Law 2025 Chapter 476 (LD 1270), "An Act to Authorize the Procurement of Energy Storage Resources."

strategies. The analyses and recommendations presented herein reflect the professional assessment of Mr. Masters and Ground Floor Energy.

1. ISO-NE Cluster Study Barriers and Distribution Interconnection Eligibility

1.1 The Cluster Study Timeline Creates a Barrier to Entry

The draft RFP requires that all bidders must have either a signed interconnection agreement, be actively participating in the Transitional Cluster Study, or have detailed plans to submit an interconnection request in the 2026 Cluster Request Entry Window expected in October 2026.[3] While Ground Floor Energy understands the need for interconnection certainty, this requirement creates a significant barrier to participation that may limit competition and reduce the quality of proposals DOER ultimately receives.

At the time of this writing (April 2, 2026), a developer who has not already entered the Transitional Cluster Study would need to enter the Maine PUC Chapter 324 Small Generator Interconnection program with CMP immediately in order to meet the requirements for entry into the cluster study by October or November of 2026.[4] Chapter 324 establishes the statewide standards for interconnecting distributed generation resources—including battery energy storage systems—to the distribution grid, with interconnection review levels ranging from Level 1 (under 25 kW) through Level 4 (projects requiring full study).[5] For a battery project in the 1–3 MW range, the Chapter 324 process is the necessary prerequisite for distribution-level interconnection through CMP, and it must be substantially complete before a developer can credibly commit to entering the ISO-NE cluster study window.

The timeline suggested in the draft RFP is extremely tight. Before a developer can commit to entering a cluster study, that developer must coordinate with the local authority having jurisdiction for permitting, secure agreement from the property owner, and align with the utility on interconnection logistics under Chapter 324. This is not merely a matter of paperwork. Each of these coordination steps involves independent timelines and decision-makers, and any one of them can introduce delay. The Chapter 324 process itself—particularly for Level 3 and Level 4 projects that require distribution

[3]Draft RFP, Section 3.2 (Interconnection and Deliverability Requirements). The Transitional Cluster Study began in October 2025 and is studying 26 projects, 21 of which are battery storage. ISO New England, Transitional Cluster Study Status Update, 2025.

[4]Maine Public Utilities Commission, Chapter 324: Small Generator Interconnection Procedures, as amended by Order in Docket No. 2023-00103, issued November 3, 2023. Available at https://www.cmpco.com/suppliersandpartners/servicesandresources/interconnection.

[5]Chapter 324, Sections 2.1–2.4, establishing four levels of interconnection review: Level 1 (inverter-based, ≤25 kW, flat fee of $150); Level 2 (25–250 kW serving on-site load, $25/kW fee); Level 3 (non-exporting, up to 10 MW); Level 4 (all other projects not qualifying for Levels 1–3 and not subject to FERC jurisdiction). Docket No. 2023-00103.

system impact studies—adds further time that must be accounted for before a developer is in a position to make an informed commitment to the cluster study.

Moreover, entering the cluster study carries real financial risk. The cluster study itself costs money, and the project behind it costs money. A developer must make these financial commitments without certainty about what interconnection upgrade costs the study will reveal—costs that the developer, not the utility, must bear entirely under the draft RFP's terms.[6] Committing capital to a cluster study entry without sufficient time to conduct proper due diligence on site control, permitting, and utility coordination under Chapter 324 is a risk that may dissuade responsible developers from participating.

Recommendation

DOER should:

(a) Extend the proposal timeline to provide adequate lead time between the October 2026 cluster study entry window and the proposal deadline, recognizing that developers need at minimum six months from cluster entry to prepare a credible, fully-costed proposal;

(b) Explicitly allow conditional proposals from developers who have entered the cluster study but have not yet received study results, with defined milestones for demonstrating interconnection progress; and

(c) Recognize in the evaluation framework that developers who are earlier in the interconnection process may offer competitive projects that simply need more timeline certainty, rather than penalizing them for a process over which they have limited control.

1.2 Distribution Interconnection Must Be a Full Pathway

The draft RFP acknowledges distribution-level interconnection as a possibility but maintains the Delivery Point at the ISO-NE pricing node representing injection onto the Pool Transmission Facility.[7] DOER has specifically requested comment on whether distribution interconnection should be eligible,[8] and Ground Floor Energy strongly urges that it should be—not merely as a secondary option, but as a fully supported pathway

[6]Draft RFP, Section 3.1 (Interconnection Costs): "All interconnection costs are borne entirely by the bidder." T&D utilities pay nothing beyond the bid price.

[7]Draft RFP, Section 3.3 (Distribution System Interconnection): The Delivery Point is defined as the ISO-NE pricing node (P-node) representing the project's injection onto the PTF system.

[8]DOER Draft RFP Public Comment Topics, Topic: "Distribution Interconnection — Should projects interconnecting at the distribution level (not just transmission/PTF) be eligible?"

with appropriate valuation of the distinct benefits that distribution-connected storage provides.

The economics of a battery sited on a distribution conductor are fundamentally different from those of a transmission-connected project, and in many cases more compelling from a ratepayer benefit perspective. Consider, for example, a community like Greenville, Maine, which is served by a 34.5 kV distribution circuit. There is no transmission circuit serving these distal communities. A battery on that distribution feeder provides localized reliability, voltage support, and congestion relief that a transmission-connected project in a different part of the state simply cannot replicate.

The Electric Sector Modernization Plans published by both Central Maine Power and Versant Power clearly identify power quality concerns in rural communities as a priority.[9] Both utilities acknowledge that distributed energy resources, including battery storage, are among the most effective tools for addressing those concerns. A battery on a rural distribution feeder directly addresses the utilities' own stated infrastructure challenges while simultaneously providing value to the ratepayers who are most vulnerable to power quality issues.

Furthermore, distribution-connected projects interconnecting under Maine PUC Chapter 324 may avoid the ISO-NE cluster study process entirely for smaller installations. The Maine PUC amended Chapter 324 in November 2023 (Docket No. 2023-00103) to specifically address energy storage systems, directing the development of an ESS Application Information Form as part of the standard interconnection forms.[10] This amendment reflects the Legislature's and the Commission's recognition that battery storage is a growing part of Maine's distributed generation landscape and that the interconnection process must accommodate it. A battery project that interconnects at the distribution level under Chapter 324 faces a more predictable timeline, more manageable costs, and less uncertainty than one that must navigate the ISO-NE cluster study—making distribution interconnection a faster and more accessible route to deploying storage capacity that counts toward Maine's 400 MW statutory goal.[11]

Recommendation

[9]Central Maine Power Company, Electric Sector Modernization Plan, filed with the Maine Public Utilities Commission. Versant Power, Electric Sector Modernization Plan, filed with the Maine Public Utilities Commission. Both plans identify distributed energy resources, including battery storage, as tools for addressing power quality and reliability in rural service areas.

[10]Maine Public Utilities Commission, Order Adopting Amendments to Chapter 324, Docket No. 2023-00103, issued November 3, 2023. The amended rule directs the Commission to develop an ESS Application Information Form as one of the standard forms described in Chapter 324, Section 4.

[11]35-A M.R.S. §10313 establishes a statutory goal of installing at least 400 MW of energy storage capacity by December 31, 2030.

DOER should:

(d) Establish distribution-level interconnection as a full, co-equal pathway in the RFP, with evaluation criteria that account for the localized benefits of distribution-connected storage (deferred distribution upgrades, reduced line losses, improved power quality, and localized reliability);

(e) Develop a valuation methodology for distribution-level benefits that can be incorporated into the quantitative evaluation alongside wholesale market benefits; and

(f) Coordinate with CMP and Versant to ensure that the distribution interconnection process under this RFP aligns with the existing Chapter 324 framework—including the recently adopted ESS Application Information Form—and with the priorities and identified needs in their Electric Sector Modernization Plans.

2. The Multi-Business Demand Aggregation Gap

2.1 The Limitation of the Efficiency Maine ESS Program

The draft RFP, in Section 3.2.8, explicitly excludes projects eligible for the Efficiency Maine Trust Energy Storage System Program.[12] The Efficiency Maine ESS program provides a $200/kW incentive for validated summer peak demand reduction, but its fundamental limitation is structural: it serves only a single business with a stated demand charge, and the incentive applies only to that singular business up to that business's individual demand.[13] The DOER RFP, by contrast, targets front-of-meter projects of 3 MW or greater interconnected to the transmission grid under 20-year contracts.[14]

The problem becomes apparent when you consider multiple businesses in aggregate. In rural communities, individual businesses may each carry modest demand charges, but collectively their aggregated demand is substantial. The Efficiency Maine ESS program cannot address this aggregated demand because it is limited to single-facility, behind-the-meter installations. Meanwhile, small business owners in these communities do not have the financial capability or the technical means to invest individually in small-scale battery systems. The result is that the businesses most in need of demand reduction support are the least able to access the existing incentive program.

2.2 The DOER RFP Can Fill This Gap

The DOER RFP has an opportunity to address this gap in Maine's storage incentive landscape by incentivizing battery developers to deploy batteries that address aggregated demand in rural areas located on distal sections of distribution conductors. A single battery installation, sited at a strategic point on the distribution system, could deliver peak demand reduction benefits to a cluster of commercial customers on the same feeder—achieving at the community level what the Efficiency Maine program achieves for a single business, but at greater scale and with additional grid benefits.

This model would extend the proven $200/kW demand reduction incentive structure to a configuration that Efficiency Maine's current program cannot cover. Rather than

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[12] Draft RFP, Section 3.2.8: "Projects that are eligible for participation in the Efficiency Maine Trust Energy Storage System Program are not Eligible Projects in this RFP."

[13] Efficiency Maine Trust, Energy Storage System (ESS) Program. Incentive: $200/kW for validated summer peak demand reduction, paid annually for 5 years. Minimum system size: 20 kW. Maximum incentive: $600,000/year per project. Requires behind-the-meter installation at a single demand-metered facility. The program does not accommodate aggregation of demand across multiple facilities.

[14] Draft RFP, Section 2.1 (Eligible Projects): Minimum project size of 3 MW nameplate capacity. Section 4.3 (Contract Term): Up to 20 years; bidders must offer at least one 20-year proposal.

requiring each small business to independently finance and install its own behind-the-meter system, an aggregated approach recognizes that the collective demand of multiple businesses on a distribution circuit creates a viable project that benefits all parties: the businesses receive demand reduction, the utility sees reduced peak loading on constrained infrastructure, and the ratepayer benefits from deferred distribution upgrades.

Recommendation

DOER should:

(g) Create a separate program track within this RFP, or a companion procurement, for community-scale aggregated demand reduction projects in the 1 MW to 3 MW range on distribution circuits, with simplified interconnection and contract requirements appropriate to their scale;

(h) Coordinate with Efficiency Maine to evaluate whether the ESS program should be expanded to allow multi-facility demand aggregation, closing the gap between the single-business limitation of the current program and the grid-scale focus of this RFP; and

(i) Include in the RFP's qualitative evaluation criteria favorable consideration for projects that serve aggregated demand across multiple businesses in rural communities, recognizing the distributed economic and reliability benefits that these projects provide to areas identified by both CMP and Versant as grid-constrained.

3. Ratepayer and Community Benefit Protections

3.1 The Asymmetry of Risk Allocation

The draft RFP establishes a framework in which virtually all project risk falls on the developer while the contracting utilities—CMP and Versant—are insulated from meaningful exposure. Developers must post $40/kW in performance security across three tranches ($10/kW at contract execution, $20/kW at LGIA execution, $10/kW at COD),[15] pay non-refundable bid fees of $750/MW,[16] bear all interconnection and upgrade costs, assume abandonment liability, and serve as Lead Market Participant.[17] The utilities, by contrast, have no obligation to post security unless their credit rating falls below investment grade and their net worth drops below $275 million[18]—a scenario that, for utilities of their size, would represent a near-catastrophic financial event.

While Ground Floor Energy understands that ratepayer protection requires meaningful developer commitments, the current structure goes beyond what is necessary to ensure project delivery and instead creates a risk profile that favors large, well-capitalized developers with existing portfolios and established utility relationships. Independent developers, smaller firms, and Maine-based companies face a disproportionate barrier to entry—not because their projects are less meritorious, but because the financial requirements are calibrated to the risk tolerance of large national or multinational firms.

3.2 Community Benefits Deserve Greater Weight

The draft RFP's evaluation framework assigns 30 of 100 points to qualitative factors, which include community and socioeconomic benefits.[19] However, the RFP explicitly states that "auxiliary benefits"—including socioeconomic and environmental value—cannot be used to satisfy the ratepayer benefit threshold.[20] Only projects that first clear

[15]Draft RFP, Section 4.4 (Performance and Security Requirements): Performance security of $40/kW of Net Contract Capacity, posted in three tranches: $10/kW at contract execution, $20/kW at LGIA execution, $10/kW at commercial operation date. Initial security forfeited if project does not reach commercial operation.

[16]Draft RFP, Section 4.4: Non-refundable bid fee of $750/MW of Net Contract Capacity per base proposal.

[17]Draft RFP, Section 3.1: All interconnection costs borne entirely by the bidder. T&D Utilities will not assume the role of Lead Market Participant.

[18]Draft RFP, utility creditworthiness provisions: Utilities have no obligation to post security unless credit rating falls below investment grade AND net worth drops below $275 million.

[19]Draft RFP, Section 5 (Evaluation Framework): Proposals scored on a 100-point scale, 70 points quantitative and 30 points qualitative.

[20]Draft RFP, Section 5.1 (Quantitative Evaluation): Auxiliary Benefits (socioeconomic, environmental) "cannot be used to pass the ratepayer benefit threshold but can help rank proposals that pass."

the quantitative ratepayer benefit test are eligible to receive credit for community benefits.

This structure means that a project with extraordinary community benefits—local job creation, workforce training, low-income ratepayer protections, and environmental stewardship—but marginal ratepayer savings could be eliminated before its community value is ever considered. Meanwhile, a project with slightly better economics but no meaningful community benefit would advance.

Maine's energy transition should serve all residents, not just those who benefit from wholesale market price reductions. The communities that stand to gain the most from energy storage—rural towns with aging distribution infrastructure, areas with high energy burden, and communities that have historically borne the costs of energy development without sharing in its benefits—deserve a procurement framework that values their interests.

Recommendation

DOER should:

(j) Establish specific, measurable criteria for how low-income ratepayer protection will be evaluated and enforced, rather than leaving it as a general qualitative factor;

(k) Allow a defined portion of community and socioeconomic benefits to contribute toward satisfying the ratepayer benefit threshold, recognizing that ratepayer benefit extends beyond wholesale market economics; and

(l) Review the performance security requirements to ensure they are calibrated to protect ratepayers without unnecessarily excluding smaller or independent developers from participation.

4. Minimum Project Size and Developer Accessibility

4.1 The 3 MW Minimum Excludes Viable Community-Scale Projects

The draft RFP sets a minimum project size of 3 MW nameplate capacity, and DOER has specifically requested comment on whether this threshold is appropriate.[21] Ground Floor Energy recommends lowering the minimum to 1 MW, or alternatively creating a separate track for projects between 1 MW and 3 MW with requirements appropriate to their scale.

As noted throughout these comments, there is a stipulated gap between the Efficiency Maine ESS program, which serves behind-the-meter installations as small as 20 kW, and this RFP's 3 MW minimum. Projects in the 1 MW to 3 MW range are large enough to provide meaningful grid benefits—particularly on the distribution system—but are excluded from both programs as currently structured.

In rural areas of Maine, a 1–2 MW battery on a distribution feeder may be the most economically rational and operationally effective storage deployment available. These communities are often served by long, radial distribution circuits at 34.5 kV or lower, with no transmission infrastructure nearby. The Electric Sector Modernization Plans published by CMP and Versant both identify power quality and reliability concerns in precisely these areas.[22] A battery that helps balance energy demand on a rural feeder addresses real, documented infrastructure needs—but at a scale below the draft RFP's current threshold.

4.2 The Regulatory Basis for a Sub-3 MW Pathway Already Exists

Ground Floor Energy urges DOER to examine the existing regulatory framework that governs the 1 MW threshold below which projects are not required to enter the ISO-NE cluster study process. That threshold is not grounded in an immutable technical principle about grid safety. It is an administrative notification threshold established under ISO-NE Planning Procedure 5-1, which governs the coordination of state-jurisdictional interconnections with the regional transmission system.[23]

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[21] Draft RFP, Section 2.1 (Eligible Projects): "Minimum project size: 3 MW nameplate capacity (DOER is seeking comment on this threshold)."

[22] Central Maine Power Company, Electric Sector Modernization Plan; Versant Power, Electric Sector Modernization Plan. Both filed with the Maine Public Utilities Commission pursuant to 35-A M.R.S. §3132.

[23] ISO New England, Planning Procedure No. 5-1: Transmission Planning Studies for Generator Interconnection. Section 2.1 establishes notification and study requirements for state-jurisdictional projects based on MW size. See also ISO-NE, "FERC Order No. 2023 — State Jurisdictional Interconnection Coordination: Affected System Operator (ASO) Study Coordination," webinar presentation, March 26, 2024, slides 15–17.

Under Planning Procedure 5-1, state-jurisdictional projects are treated in three tiers. Projects below 1 MW require no notification to ISO-NE whatsoever. Projects between 1 MW and 5 MW must submit a Generator Notification Form, but ISO-NE performs a screening to determine whether further analysis is needed—and for many projects in this range, a Level 0 concurrence through the Reliability Committee Consent Agenda is sufficient, meaning no transmission system impact study is required.[24] Only projects that are individually or in aggregate 5 MW or greater are automatically required to submit a Proposed Plan Application supported by Level III analysis—a full transmission system impact study under Planning Procedure 5-6.[25]

This tiered structure demonstrates that ISO-NE itself does not treat all projects above 1 MW as presenting equivalent risk to the transmission system. A 2 MW battery on a 34.5 kV distribution feeder in Greenville is subject to screening, not automatic study—and it may well pass that screening with no further analysis required. The 1 MW threshold is a notification trigger, not a determination that projects above it pose unacceptable grid impacts.

This administrative reality is reinforced by FERC's own technical findings. In FERC Order No. 792 (Docket No. RM13-2-000, issued November 22, 2013),[26] the Commission revised the Fast Track Process eligibility for inverter-based generators—which includes battery energy storage systems—from a flat 2 MW limit to a voltage-tiered table reaching up to 5 MW.[27] On circuits rated 30 kV and above, certified inverter-based generators are eligible for Fast Track interconnection at up to 4 MW regardless of location, and up to 5 MW when located on a mainline and within 2.5 electrical circuit miles of a substation.

The Commission's determination was explicit: inverter-based generators have lower fault current contributions than synchronous and induction machines, and this technical

[24]ISO-NE, "FERC Order No. 2023 — ASO Study Coordination" webinar, March 26, 2024, slide 16: "Level 0 is concurrence of a project's Generator Notification Form proceeding to the Reliability Committee Consent Agenda. No study is required for these projects under Planning Procedure 5-1."

[25]ISO-NE, "FERC Order No. 2023 — ASO Study Coordination" webinar, March 26, 2024, slide 17: "Projects that are individually, or in aggregate, greater than or equal to 5 MW are automatically required to submit a Proposed Plan Application, supported by Level III analysis, pursuant to section 2.1 of Planning Procedure 5-1."

[26]Federal Energy Regulatory Commission, Order No. 792, Small Generator Interconnection Agreements and Procedures, Docket No. RM13-2-000, issued November 22, 2013, 145 FERC ¶ 61,159.

[27]FERC Order No. 792, ¶¶102–103. The Commission adopted voltage-tiered Fast Track eligibility for inverter-based generators as shown in Table 3 of the Order: on circuits ≥5 kV and <15 kV, up to 2 MW (regardless of location) or 3 MW (on a mainline within 2.5 miles of substation); on circuits ≥15 kV and <30 kV, up to 3 MW or 4 MW; on circuits ≥30 kV, up to 4 MW or 5 MW.

characteristic justifies allowing them to interconnect at larger sizes without the full study process.[28]

The implications for the DOER RFP are direct. A battery energy storage system is, by definition, an inverter-based resource. On a 34.5 kV distribution circuit—the very type of circuit serving communities like Greenville—FERC has determined that an inverter-based generator of up to 4 or 5 MW can be safely interconnected through an expedited process. ISO-NE's own Planning Procedure 5-1 does not require automatic transmission system impact studies for state-jurisdictional projects below 5 MW. And Maine PUC Chapter 324 provides the established procedural framework for distribution-level interconnection of these resources, including the recently adopted ESS Application Information Form.

Taken together, these regulatory facts provide a strong basis for DOER to include battery projects below 3 MW in this procurement—and, indeed, to extend eligibility to projects as small as 1 MW. The federal and regional regulatory framework already treats projects in this size range as presenting manageable grid impacts that can be addressed through screening and the existing distribution interconnection process, without requiring entry into the ISO-NE cluster study.

4.3 The Economics of Rural Distribution Circuits Require an Additional Incentive

There is an additional and critical economic consideration that DOER must address. The financial viability of battery energy storage on the wholesale market depends in significant part on the top-bottom spread—the difference between peak and off-peak energy prices at the relevant pricing node.[29] In distal locations on the distribution system—precisely the rural areas where batteries are most needed for grid support—the top-bottom spread at the relevant ISO-NE pricing node often does not reflect the true condition, age, and fragility of the distribution circuits serving those communities.

The Electric Sector Modernization Plans published by both CMP and Versant identify rural distribution circuits as grid-constrained regions with power quality and reliability

[28]FERC Order No. 792, ¶106: "[T]he technical characteristics of synchronous and induction machines, such as higher fault current capabilities, may require further study to ensure the safety and reliability of the interconnection." The Commission therefore maintained the 2 MW Fast Track threshold for synchronous and induction machines while increasing it for inverter-based generators. See also Thomas Cleveland & Michael Sheehan, "Updated Recommendations for FERC Small Generator Interconnection Procedures Screens," Solar America Board for Codes and Standards, July 2010, p. 2 and Appendix I (cited in Order 792, ¶106 n.217).

[29]The top-bottom spread, or peak-to-off-peak price differential, is the primary driver of energy arbitrage revenue for battery storage. A larger spread means greater revenue opportunity per charge-discharge cycle. Locational marginal prices at ISO-NE pricing nodes vary significantly by location and grid conditions.

concerns.[30] Yet the wholesale market pricing signal at these locations does not adequately compensate a battery developer for the grid reliability and power quality benefits that a battery provides to these constrained circuits. Without a large top-bottom spread, rural small battery developers face a decreased financial incentive to deploy batteries in the very areas where both utilities have acknowledged that grid fortification is most needed.

This is why an additional incentive for smaller distributed generation resources in the 1 to 3 MW range on distribution circuits is essential. The DOER RFP's evaluation framework and pricing structure must account for the fact that the distribution-level benefits of these batteries—deferred infrastructure upgrades, reduced line losses, improved voltage regulation, and localized reliability—are real and substantial, even when they are not fully captured by the wholesale energy market price signal. Without such an incentive, the procurement will systematically undervalue projects sited in the locations where storage provides the greatest infrastructure benefit, and developers will rationally choose to site projects in locations with better wholesale market economics but less grid need.

4.4 Lowering the Threshold Increases Competition and Deployment

A lower minimum project size would increase the number of competitive proposals DOER receives, diversify the geographic distribution of storage deployments across Maine, and enable participation by smaller and Maine-based developers who may not have the resources to develop 3 MW or larger projects but can deliver high-quality, well-sited smaller installations.

Smaller projects also offer deployment advantages. They require less site area, face simpler permitting requirements, can be developed on a faster timeline, and in many cases can interconnect at the distribution level under Maine PUC Chapter 324 without triggering the full ISO-NE cluster study process. Chapter 324's tiered review levels are specifically designed to accommodate distributed generation at these scales, and the Commission's 2023 amendments added provisions for energy storage systems.[31] Every megawatt of storage deployed counts equally toward Maine's 400 MW statutory goal,

[30]Central Maine Power Company, Electric Sector Modernization Plan; Versant Power, Electric Sector Modernization Plan. Both plans identify power quality and reliability concerns in rural service territories and recognize distributed energy resources, including battery storage, as tools for addressing those concerns.

[31]Maine PUC, Order Adopting Amendments to Chapter 324, Docket No. 2023-00103, November 3, 2023. The amended rule incorporates energy storage systems into the interconnection framework and directs development of an ESS Application Information Form.

and DOER should structure its procurement to capture value across a range of project scales.

Recommendation

DOER should:

(m) Lower the minimum project size to 1 MW, or create a separate procurement track for projects between 1 MW and 3 MW with streamlined requirements;

(n) Recognize that distribution-connected projects below 3 MW can provide substantial ratepayer and grid benefits, and should not be excluded simply because they do not fit the transmission-scale model envisioned in the current draft; and

(o) Align the minimum project size with the Chapter 324 distribution interconnection pathway so that smaller projects can participate through the existing Maine PUC framework without the cost and timeline burden of the ISO-NE cluster study process.

Conclusion

Maine's commitment to deploying 400 MW of energy storage by 2030 is ambitious, necessary, and achievable—but only if the procurement framework is designed to attract a broad range of developers and projects across the full spectrum of scales, technologies, and grid configurations. The draft RFP, as currently written, is oriented primarily toward large, transmission-connected projects developed by well-capitalized firms with existing ISO-NE interconnection positions. While such projects will undoubtedly form an important part of Maine's storage portfolio, they alone will not achieve the geographic, economic, and reliability benefits that the Legislature intended when it enacted 35-A M.R.S. §10313.

The recommendations in these comments are offered constructively and with the goal of strengthening the final RFP. Specifically, Ground Floor Energy urges DOER to: extend the procurement timeline to account for the realities of the ISO-NE cluster study process; establish distribution interconnection as a full, co-equal pathway; address the incentive gap between Efficiency Maine and this RFP for community-scale aggregated demand reduction projects; strengthen community benefit protections in the evaluation framework; and lower the minimum project size to 1 MW to enable storage deployment in the rural communities that need it most.

Ground Floor Energy appreciates the opportunity to provide input on this important procurement and looks forward to reviewing the final RFP.

Respectfully submitted,

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Ground Floor Energy