



# SOLAR ENERGY ASSOCIATION OF MAINE

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November 3, 2021

To: Distributed Generation Stakeholder Group

From: Steve Weems, Executive Director, Solar Energy Association of Maine

Subject: Input Re: Priorities for 2021 Work of the Stakeholder Group

Please focus on the top line priority in Chapter 390 Public Law (LD 936 as enacted) which calls out *“How the **State** (emphasis mine) should undertake the adoption and implementation of a forward-looking, holistic grid planning process that allows for input from stakeholders and provides key actors with the ability to more strategically make system operations, planning and investment decisions.”*

This is incredibly important due to the moribund status of long-range, strategic grid planning within Maine’s two IOUs. One could make a strong case such planning isn’t and shouldn’t be an IOU responsibility anyway, because such planning should directly reflect State policy parameters, not IOU interests. In any case, the Solar Energy Association of Maine (SEAM) thinks setting up a grid planning process synonymous with the wording of the statute should be the highest priority of the DG stakeholder group over the next nine weeks. It is that important and is supposed to be included in the interim report due January 1, 2022. Enabling legislation is highly likely to be needed in the 2022 legislation session.

Fortunately, you have the work of the MURRDI on which to build. You know this was a serious, professional effort and strategic, holistic grid planning rose to the top of this high-level and active group’s list of recommendations. Please use this as your jumping off point among the DG stakeholder group. There is an excellent overlap of members, and in SEAM’s opinion the MURRDI recommendation provides a solid conceptual framework to develop further.

In this respect it is our further opinion that the PUC should be considered as the leading State entity in such a process, for many reasons. We further think this would absolutely REQUIRE legislative change to expand the purpose of the PUC, authorize it to perform this function, and spell out the source of funding for this new role. We

especially like the PUC for this potential role due to its overall size, the possibility of eventually tying the resulting plan(s) with subsequent regulatory approval(s) for grid modernization and expansion (although this probably would require careful separation of functions within the PUC), and precedents in other states (e.g., Connecticut) from which much could be learned. As a participant in the MURRDI work, I think these thoughts are compatible with what I heard the PUC Chair say during the MURRDI stakeholder group work, although he speaks for himself as a key member of the DG shareholder group.

The second aspect on which we would like to comment now is the “7% of total load based on operational capacity” target. This clearly is a somewhat arbitrary target born of concern about the recent pace of distributed generation solar development, as any objective student of the history of this figure would acknowledge. While possibly useful as a target in the short-term, the longer-term optimum amount of DG capacity is open for further analysis. Reconsideration of this aspect of the State’s policy is included as the first order of business to be included in the final report due from the DG stakeholder group on January 1, 2023. Section 4, subsection 3.A. states “*Identification of the recommended optimum total amount of distributed generation for the program period represented as a percentage of total load.*”

SEAM is concerned a fixation on the 7% figure as a working target will result in a serious underinvestment in DG, and a companion failure to be sufficiently imaginative in the conceptualization of the dynamic two-way grid system of the future, resulting in an underachievement of the benefits of DG. As Fortunat Mueller pointed out in your last meeting, the **timing** of investments in solar and offshore wind, coupled with a consideration of how long solar resources will last (beyond the 2050 100% decarbonization target), means the electric system must be front-loaded with solar generation of all sizes and types. Further, it is not yet clear whether and when large-scale generation off offshore wind will be economically digestible, which may mean the eventual balance between wind and solar will have to be shifted further in the direction of solar to achieve Maine’s decarbonization goals.

This is in the way of really serious “food for thought,” and SEAM hopes you will consider these comments and those of Fortunat as a major open question about how much DG is optimal in your work, both for the interim report and especially for the final report.