

Dan Burgess, Acting Commissioner  
Maine Department of Energy Resources  
62 State House Station  
Augusta, Maine 04333

April 20, 2026

**RE: Public Comment in Response to Draft Request for Proposals for Energy Storage Projects**

Dear Acting Commissioner Burgess,

The Nature Conservancy in Maine would like to voice our support for this draft energy storage RFP as a critical step towards meeting our statewide targets for clean and renewable energy use. Energy storage is essential for enabling higher utilization of renewable energy by reducing curtailment, improving grid reliability and resilience, while providing benefits to both ratepayers and the environment.

We would like to offer comments on the following sections of the RFP:

1. In **section 3.1** of the RFP, the Department states that they will evaluate projects based on their ability to minimize environmental impacts but does not specify how they will assess this. Section 3.3.1.d elaborates on this only so far as to add “proposals will be favorably evaluated to the extent to which the project will avoid, minimize, and mitigate detrimental environmental impacts.” The Nature Conservancy suggests adding criteria that evaluates projects based on siting that reduces habitat fragmentation to the greatest extent possible and prioritize siting in previously disturbed areas.
2. In **section 3.4** Final Selection Process and Factors, the RFP states that the Department will consider and weigh at its discretion the efficient utilization of transmission points of interconnection and transmission corridors and rights of way, if applicable, and the efficient utilization of and enhancement to distribution grid infrastructure, if applicable. The Nature Conservancy encourages that the Department articulate preference for projects that prioritize use of existing rights of way, in an effort to limit the impact of the project in previously undisturbed areas and reduce habitat fragmentation as a result of additional grid infrastructure. Additionally, use of existing rights of way will limit additional impacts on communities.
3. **Section 5.1.10** titled, “Environmental Impact Assessment Plan” specifies that the bidder should describe whether the project makes positive re-use of a previously disturbed site, such as brownfields. The Nature Conservancy suggests that the Department should include this in their evaluation of a project, as projects sited on brownfields and previously disturbed areas should be weighed favorably. Moreover, we suggest adding language that specifically discourages siting in high-value wildlife habitat, floodplains, and wetlands.

4. **Section 5.1.16** concerns stakeholder engagement. From experience, we know that best practices for equitable community engagement requires developers to engage early and often with the impacted communities. The Nature Conservancy advocates for a “3 C” approach to clean energy development—projects must demonstrate how they consider communities, conservation, and climate. We would recommend that project developers be asked to articulate how they plan to account for these three variables and how their plans address conflict between the 3 C pillars (community, conservation, and climate). We would like to articulate a strong preference for the Department to give preference to projects sited in already impacted landscapes, with the knowledge that in doing so, there must be extra care for equity concerns from the host communities. All opportunities and impacts are site specific, and each project should demonstrate their thought process behind balancing the 3 C’s.

Additionally, the Department highlighted several topic areas for consideration, and The Nature Conservancy would like to offer feedback on several of these as well:

## II. Interconnection and Delivery

Question: DOER intends that projects collocated with generation are eligible to respond to this RFP, provided they meet all other established eligibility criteria. Does the RFP inadvertently preclude projects collocated with generation?

Answer: Strong preference for including language in the RFP that stipulates the collocated generation should come from renewable sources, such as wind turbines and solar panels, not from fossil fuel-based energy resources.

## III. Safety and Security Plan Requirements

Question: What other aspects can be addressed in the safety and security plan referenced in section 5.1.11?

Answer: Based on past examples, we know communities have expressed concerns that battery storage systems can be a fire-hazard and are hesitant to host these projects. It seems reasonable to include in both the community engagement and outreach plan and the safety and security plan a requirement to provide resources to local fire departments and EMS professionals for training specific to putting out battery fires. While battery fires are rare, providing emergency response professionals adequate training is practical and reasonable for ensuring preparedness in the event of an emergency, building community trust, and negotiating a community benefits agreement.

TNC would like this RFP to result in successfully built energy storage to support clean and renewable energy use in Maine. We hope our comments and suggestions can help shape the RFP towards successful outcomes for communities and our state’s energy storage goals. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Karen Blakelock". The script is fluid and cursive, with the first name "Karen" and last name "Blakelock" clearly legible.

Karen Blakelock

Policy Advisor  
The Nature Conservancy  
Brunswick, Maine