

Front of the Meter DER Program Design
Draft Program Proposal

Unity Energy Partners Comments

Dear Department of Energy Resources:

I appreciate the work that has gone into this draft and support the goal of a durable, value-based front-of-the-meter (FTM) program. However, it is not yet a workable successor to Net Energy Billing (NEB). As a Maine business that employs local people and works with small businesses and towns, we are concerned that it asks new project owners to forgo NEB without providing a replacement that developers, lenders, customers, and communities can model and execute.

The Standard Offer Block has no published compensation rate or initial enrollment volume. The draft presents several future pricing options, which leaves capacity treatment unresolved, and says annual rates and caps will be set before each block opens (Draft §5.1). The Distribution System Services (DSS) opportunity depends on future Integrated Grid Planning (IGP) results and may be worth \$0 where a utility has not identified a need (Draft §5.2). The benefit-cost analysis and implementation assessment also remain future work (Draft §7). Without knowing the value that will replace NEB credits, parties cannot confidently model projects, obtain financing, order equipment, or make commitments to customers.

This uncertainty is already costly. Solar projects often take years to develop, permit, interconnect, finance, and build. It puts our business, our customers, and the towns and small businesses we serve on hold, potentially indefinitely, while limiting customers' meaningful opportunities to reduce electricity costs. Maine cannot keep waiting through studies, tariff design, and rulemakings while projects are paused, investment is frozen, and clean-energy workforce opportunities are lost. The remaining federal tax-credit window closes at the end of 2027. A program that is not financeable until after that window will not provide a meaningful transition for Maine's solar industry.

DOER should take decisive near-term action. It should submit a final program with a bankable baseline tariff, effective on a fixed launch date, which publishes compensation, capacity treatment, eligibility, contract terms, initial annual megawatt enrollment blocks, cost recovery, and clear curtailment and performance rules. The ratepayer-benefit test should guide the program, but it should not defer the material terms needed to make a project financeable.

DSS should be a voluntary, added opportunity, not a condition for a functioning market. IGP can help identify higher-value services, but the draft acknowledges that current plans lack the project-specific detail needed to deploy and compensate projects (Draft §§3.4, 4.5). DOER should also prioritize current, public hosting-capacity maps and feeder-level.

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interconnection information. These practical tools can help developers identify viable sites now.

The draft also misses an important opportunity on commercial load reduction. It says a load-reducer program is not included in the near-term design, although LD 1777 directs DOER to consider one (Draft §2, Table 2-1; §4.4). Maine businesses need a practical path to use co-located rooftop and ground-mount FTM projects on their campuses to manage costs and earn credits. For businesses near the 25-kW medium-service threshold, crossing it by even a fraction can trigger a steep change in rate treatment and demand charges that are not proportional to the additional load. A business should not lose its ability to stabilize energy costs because unintended changes its rate classification. DOER and the MPUC should address this directly, including a pathway for appropriate businesses to remain in, or transition to, kWh-based rate treatment.

Maine needs more than a planning framework. It needs a transparent program that the market can model, finance, and build now, before further opportunities and jobs are lost. We do not believe the Legislature intended the transition from NEB to leave local solar projects, their customers, and Maine's clean-energy workforce without a practical path forward for years.

Thank you for your time and consideration of these comments.

Sincerely,



Tyler G. Eads

CEO & Co-Founder

Unity Energy Partners