



RE: Maine Department of Energy Resources
Front-of-the-Meter DER Program Draft Program Proposal
Versant Power Initial Comments

DT: September 11, 2026

To Whom It May Concern:

Versant Power ("Versant" or "Company") appreciates the opportunity to offer these initial comments on the draft Front-of-the-Meter DER Program Proposal ("Program" or "Proposal") released August 27, 2026, by the Maine Department of Energy Resources ("DOER" or "Department") pursuant to LD 1777. The Company reserves the right to submit additional feedback as the FTM-DER Program is further refined.

The DOER notes that, "The purpose of publishing the proposal at this stage is to give stakeholders an opportunity to review the proposed approach, identify concerns or implementation issues, suggest alternatives, and provide information that should be considered before DOER finalizes its recommendation to the Maine Public Utilities Commission (MPUC)."

First, Versant appreciates and supports the Program's goal of maximizing the value DERs can provide to the grid and to Maine ratepayers. Given Maine's current level of DER penetration, which likely ranks first in the United States as a percentage of peak load, Versant believes any new DERs deployed pursuant to state policy programs, or with the support of public or ratepayer funding, should be designed, sited, and operated strategically to provide grid and ratepayer benefits while minimizing costs.

Versant also appreciates the recognition that additional advanced utility capabilities will be necessary to fully implement the Program¹, particularly the concept of a Distribution System Services Contract ("DSSC"). Versant is currently working to put in place technologies and tools that are foundational to the requirements necessary to implement a DSSC approach to DER dispatch. Specifically, the Company has an active project to implement an Advanced Distribution Management System ("ADMS") that will support the efficient operation and management of the grid in a high-DER environment, as well as enable additional advanced capabilities. Versant anticipates a Distributed Energy Resource Management Systems ("DERMS") module, which would be layered on top of Versant's ADMS, will be necessary to fully realize later Program phases, including full implementation of the DSSC concept.

Versant anticipates DER projects under the DSSC concept to have the highest potential value in addressing system needs relating specifically to DERs. As demonstrated by Versant's first IGP, traditional utility solution to *load-based* needs are generally both cost effective and efficient, including when compared to current Non-Wires Alternative ("NWA") options for meeting the same need. Title 35-A §3132-B currently incorporates load-driven projects as part of the NWA

¹ Me. Dep't of Energy Res., *Front-of-the-Meter DER Program Design: Draft Program Proposal*, 22 (Aug. 27, 2026), <https://www.maine.gov/energy/sites/maine.gov.energy/files/2026-08/Maine%20DOER%20FTM%20DER%20Draft%20Program%20Proposal.pdf> ("Later program phases can reflect the operational and physical evolution of the electricity system, which may include dynamic flexible interconnections, real-time asset dispatch, DERMS integration, and other features that enable provision of more precise grid services.").

review process, and Versant also internally evaluates non-traditional utility solutions when proposing relevant projects. Given this, and potential ability of DERs (particularly Battery Energy Storage Systems ("BESS")) to provide useful services capable of addressing *DER-driven* grid needs, the Company supports utilizing the utility Integrated Grid Plans ("IGP") to identify DER-driven needs that may be candidates for utility-led or Program-supported DER solutions.

Versant notes that, in addition to the costs associated with technology implementation, resources, time, and operational changes will be necessary to accommodate studies related to the increased complexity of the distribution system as well as the requirements of ongoing DER dispatch, compliance verification, and other needs. According to the cost-causer-pays approach, much of the cost associated with such capabilities would be assigned to interconnecting DERs; however, additional clarity from the DOER and MPUC will be necessary surrounding precisely how such costs should be recovered from Program participants.

Versant understands the DSSC concept would rely, in part, on published utility IGPs to identify specific projected grid needs that may be candidates for DER solutions. The Company notes that the utilities will require additional clarity around the precise data that future IGPs will need to include in order to provide potential project developers with the necessary information to propose DER solutions to IGP-identified needs. For example, what level and type of utility information would be necessary for a developer to propose a realistic project? For how long should that information be considered valid for the purposes of project development before becoming outdated due to system changes? Insofar as the Department anticipates expanding the Program from the initial stage to include a DSSC concept within the time horizon of the next iteration of utility IGPs, the development process for which is set to begin in November 2027, Versant encourages the Department to discuss such information needs early in the next MPUC IGP proceeding.

Additionally, while the current Program proposal does not allow utilities to participate in bidding DER solutions to meet grid needs, in evaluating potential Program projects, both the DOER and MPUC should consider the potential of utility-led projects to meet such needs more cost-effectively and/or more efficiently from an operational perspective.

Versant Power thanks the Department for the opportunity to submit this feedback and supports the goal of ensuring future publicly supported DER deployment in Maine is pursued in a way that maximizes value to both ratepayers and the grid while minimizing cost.

Sincerely,

/s/Arielle Silver Karsh

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