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**Testimony Neither For Nor Against  
LD 1726, “An Act to Enhance the Coordination and Effectiveness of Integrated  
Distribution Grid Planning”**

April 29, 2025

Senator Lawrence, Representative Sachs, and distinguished members of the Joint Standing Committee on Energy, Utilities and Technology,

My name is Heather Sanborn, here today as Public Advocate, to testify neither for nor against LD 1726, “An Act to Enhance the Coordination and Effectiveness of Integrated Distribution Grid Planning.” We want to thank Representative Runte for bringing the bill forward.

In particular, we welcome and strongly support Section 10 of the bill, which provides for the commission to conduct a review of the nonwires alternative (NWA) investigation and recommendation process. We think that a thorough review is warranted and could help to identify opportunities to improve the NWA process so that it produces more meaningful ratepayer savings.

More generally, we appreciate the emphasis in the bill on ensuring that integrated grid plans, which take a lot of resources to create and review, are meaningfully utilized in other aspects of the commission’s work, including procurements.

We do have some concerns about requiring a single energy forecasting method for supply and demand to be used across several disparate use cases and over an uncertain period of time. Energy forecasting models are constantly evolving. ISO New England has just released a draft of their Capacity, Energy, Loads, and Transmission (CELT) forecast model<sup>1</sup> for 2025. It has a number of changes to its methodology since last year’s forecast. We have some concern that the language regarding consistency of forecast methodology in the bill would be both difficult to implement and could inadvertently lock the Commission in to using an outdated lens to make critical decisions.

I welcome your questions and would be pleased to provide additional information for the work session.

Respectfully submitted,  
Heather Sanborn  
Public Advocate

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<sup>1</sup>This presentation outlines the changes to the forecast model: [https://www.iso-ne.com/static-assets/documents/100021/a08\\_2025\\_03\\_19\\_pac\\_update\\_on\\_the\\_celt\\_2025\\_forecast.pdf](https://www.iso-ne.com/static-assets/documents/100021/a08_2025_03_19_pac_update_on_the_celt_2025_forecast.pdf)