



State of Maine  
Office of the Public Advocate  
112 State House Station, Augusta, Maine 04333-0112  
(207) 624-3687 (voice) 711 (TTY)  
www.maine.gov/meopa

Janet T. Mills  
GOVERNOR

William S. Harwood  
PUBLIC ADVOCATE

**Testimony Neither for nor Against  
LD 327, “An Act to Provide Maine Ratepayers with Equitable Access to  
Interconnection of Distributed Energy Resources”**

May 10, 2023

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

My name is William Harwood, here today as Public Advocate, to testify neither for nor against LD 327, “An Act to Provide Maine Ratepayers with Equitable Access to Interconnection of Distributed Energy Resources.”

The OPA understands the need to continue to focus on interconnection rules. It has been a difficult issue for both utilities and developers.

At a high level, it is important that ratepayers not pay for interconnection costs which are caused directly by the interconnecting generator. This so-called “cost causation” principle has been a well-established regulatory principle for many decades.

More specifically, the OPA is concerned about favorable treatment for “on-site solar generation.” For those projects participating in Net Energy Billing, there is already a substantial ratepayer subsidy built into the program. If the Committee thinks this specific concept has merit, the OPA recommends that it be applied to smaller projects under 660 kW, which was the cap on NEB projects before it was expanded by LD 1711 in 2019. Adopting the cap for this bill would be consistent with returning the NEB program to the modest and affordable program that it was before 2019.

Thank you for your time, attention, and consideration of this testimony. The Office of the Public Advocate looks forward to working with the Committee on LD 327 and will be available for the work session to assist the Committee in its consideration of this bill.

Respectfully submitted,

William S. Harwood  
Public Advocate