



STATE OF MAINE
PUBLIC UTILITIES COMMISSION

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March 31, 2026

Honorable Mark Lawrence, Senate Chair
Honorable Melanie Sachs, House Chair
Members, Joint Standing Committee on Energy, Utilities and Technology
100 State House Station
Augusta, Maine 04333

RE: 2025 NEB Cost-Benefit Analysis Report

Dear Senator Lawrence, Representative Sachs and Members of the Joint Standing Committee on Energy, Utilities and Technology:

35-A M.R.S. § 3209-C(3) directs the Maine Public Utilities Commission (Commission) to annually determine the costs and benefits of distributed generation under net energy billing (NEB) and provide the results for the prior year in a report to the Legislature by March 31. The report must include a determination of which costs and benefits are monetized and to whom the monetized value accrues. The Commission engaged Sustainable Energy Advantage (SEA) to provide the Report.

The Commission has completed the Report, and it is attached. The Report is accompanied by comments as filed in Docket No. 2026-00053.¹ The background, findings of the report, and recent changes to the process are described below.

In Docket No. 2024-00149, the Commission conducted an investigation into the costs and benefits of NEB.² The Net Energy Billing Report as prepared by SEA for calendar year 2023 was used as the basis for the investigation. In the stipulation approved by the Commission at the conclusion of the investigation, the Stipulating Parties concluded that there were no additional benefits monetized by the utilities that could be used to adjust stranded costs.³ The stipulation also concluded that while there were aspects of the reports that could be improved, there was no

¹ *Maine Public Utilities Commission, Commission Initiated Summary Investigation Seeking Comment on the 2025 Net Energy Billing Report,*

² *Maine Public Utilities Commission, Commission Initiated Investigation into Allocation of Benefits of Distributed Generation Under Net Energy Billing*

³ Docket No. 2024-00149, Stipulation at 4 (Oct. 15, 2025)

need for further adjudication of the 2023 and 2024 reports with respect to the Commission’s reporting requirements under 35-A M.R.S. § 3209-C(3).⁴

The Stipulating Parties also filed a cover letter urging the Commission to revise its process for issuing future reports. In particular, the Stipulating Parties suggested that “the Commission issue a draft of the report and convene a non-adjudicatory proceeding affording interested parties a reasonable opportunity to review the draft report and provide input thereon for the Commission’s consideration.” For the 2025 report, the Commission opened Docket No. 2026-00053 to provide this opportunity for comment.

For calendar year 2025, SEA concluded that the costs of the NEB program were \$313 million and the benefits were \$257 to \$391 million. The range of benefits depends on whether greenhouse gas benefits claimed regionally (i.e. through the selling of renewable energy certificates into the regional market) are considered as benefits to Maine in the analysis. SEA included several changes to the Report in response to stakeholder feedback in Docket No. 2024-00149; these changes are summarized in Section 2.5 and noted throughout the Report.

The Commission has carefully reviewed the public comments collected in Docket No. 2026-00053 and concludes that no further changes are warranted to the Report for calendar year 2025. The Commission will take the comments under advisement when developing reports in future years.

Sincerely,



Philip L. Bartlett II

cc: Lindsay Laxon, Legislative Analyst, Office of Policy and Legal Analysis

⁴ Id.