



STATE OF MAINE
PUBLIC UTILITIES COMMISSION

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December 2, 2025

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: Final Report Required Pursuant to Public Law 2023, Chapter 307 on the Interconnection Working Group

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

During the First Special Session of the 131st Legislature, [Public Law 2023, chapter 307](#) (Act) was enacted and went into effect on October 26, 2023. Section 8 of the Act requires the Maine Public Utilities Commission (Commission) to convene a working group¹ “to collaborate and resolve disputes relating to the implementation of the State’s small generator interconnection procedures for Level 1 and Level 2 facilities, as defined in Chapter 324 of the Commission’s Rules.” The Act requires the Commission to submit three reports on the activities of the working group. The first report was due and submitted on December 6, 2023, an interim report was due and submitted on December 6, 2024, and the final report is due on December 6, 2025.

Section 8 of the Act requires that the working group meet monthly for the first year and then quarterly until the submission of the final report in December 2025. Throughout 2025, the working group met on five occasions: March 17, April 24, May 30, July 16, and September 11. The working group met more frequently than the quarterly basis described in the Act to allow the Commission to receive valuable input from working group members before initiating its inquiry into issues related to Chapter 324². The working group’s suggestions were all incorporated into the Chapter 324 Notice of Inquiry issued on October 15, 2025.

Upon adjournment of the working group meeting held on December 5, 2024, the working group members agreed to meet outside the working group to discuss proposed changes to several

¹ The membership of the working group is attached to this letter

² Docket No. 2025-00303, Commission Initiated Inquiry into Issues Related to Chapter 324 of the Commission’s Rules

sections in Chapter 324. During the first working group meeting of 2025, held on March 17, the working group provided an updated copy of Chapter 324 to the Interconnection Ombudsman. The updated copy was developed during the collaborative working group sessions held outside of the formal working group meetings and included redlines indicating the items for which the working group had reached a consensus and items which warranted further discussions and refinement. The consensus items are as follows.

1. Definitions

Changes proposed to this section of the rule were primarily intended to further distinguish between utility-owned and customer-owned infrastructure as a point of reference for the following terms: *Distribution Upgrades*, *Interconnection Facilities*, *Point of Common Coupling*, and *Point of Interconnection*. These proposed changes are considered administrative and helped provide clarification for how to interpret important provisions.

Another proposed change to this section of the rule revises the definition of *Level 1* to increase the nameplate rating threshold for Level 1 projects from 25kW to 50kW if the project's export capacity doesn't exceed 25kW. This change could positively impact projects choosing to incorporate energy storage as long as those projects ensure their export capacity doesn't exceed 25kW. This proposal reflects language in IREC's 2023 Model Interconnection Procedures.

The working group also proposes excluding interconnection facilities and metering equipment from the definition of *Minor System Modifications* and its established material cost threshold of no greater than \$30,000. The group also created a new definition for *Relevant Minimum Load* that specifies solar-only facilities with no storage should be screened and evaluated between the hours of 8am and 4pm. Both changes benefit Level 1 and Level 2 projects during the General Technical Screening and Additional Review processes.

2. General Technical Screening Criteria

The working group proposes requiring utilities to screen projects based on the actual relevant minimum load while performing the penetration screen, § 7(A) of Chapter 324, opposed to screening projects based on a fixed percentage of peak load that's intended to reflect the minimum load. The current rule's § 7(A) screen requires the amount of aggregated generation allocated to the project's line section or upstream line sections to not exceed 15% of its respective peak load. However, by using the actual relevant minimum load instead of 15% of peak load, the § 7(A) screen will provide a more accurate representation of the condition of each line section evaluated during this screen. This proposed change reflects the recommendations in IREC's 2023 Model Interconnection Procedures.

3. Additional Review

The working group proposes adding a new section to the rule that would prescribe the steps and analyses performed during the Additional Review process for Level 1, Level 2, and Level 3 projects. Providing more detailed requirements for Additional Review gives interconnection customers and project developers an understanding and expectation of the types of analyses the T&D Utilities will be performing during Additional Review.

4. Level 1, Level 2, and Level 3 Screening Criteria and Process

The working group proposes changes to the Level 1, Level 2, and Level 3 screening criteria and processes to increase the level of transparency included in projects General Technical Screening and Additional Review results (if applicable). The working group proposes requiring additional details indicating which screens a project failed and quantify the margin of failure. The additional detail allows projects to make more informed decisions when considering next available steps in the interconnection process. (e.g., undergo Additional Review, reapply as Level 3, reapply as Level 4)

5. Dispute Resolution

The working group proposes changes to the dispute resolution process to incorporate the role of the Interconnection Ombudsman. Although the Interconnection Ombudsman now facilitates dispute resolution during the informal steps of the process, § 17(A) and § 17(B), these proposed changes formalize this practice. Additionally, the working group proposes that a party who initiates this process be required to send a copy of their written notice to the Interconnection Ombudsman, which would improve the Interconnection Ombudsman's ability to track interconnection disputes throughout each step of the dispute resolution process.

The working group also identified several key areas of Chapter 324 that the group agreed would benefit from modification. However, the working group was not able to reach a consensus on how best to modify those provisions. These areas include: 1) establishing some amount of reserved interconnection capacity across all circuits for small projects serving on-site load, 2) establishing a waitlist for circuits with known interconnection constraints, and 3) establishing new reporting requirements for the utilities that would communicate the remaining reserved capacity for each circuit and identify which circuits have a waitlist.

The discussions and presentations regarding these topics allowed Commission Staff to understand the different positions of working group members. The Commission is seeking input on these areas where consensus was not reached in its Chapter 324 Notice of Inquiry.

Over the course of the next several months, the Commission anticipates working group members will be actively engaged in the Chapter 324 Inquiry advocating for changes that benefit the interconnection of Level 1 and Level 2 projects and help to prevent and resolve disputes. While there are currently no plans to continue formal meetings of the working group, the Commission has benefited from the insight from working group members and will keep their

recommendations at the forefront as it conducts the process for implementing the next iteration of Chapter 324.

Sincerely,

A handwritten signature in black ink, appearing to read "Romain Richards", written in a cursive style.

Romain Richards
Interconnection Ombudsman
Maine Public Utilities Commission

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

Working Group Members Pursuant to Public Law 2023, chapter 307

One or More Representatives from CMP

- Nathan Pelletier
- Kim Cullen
- Michael Rossignol

One or More Representatives from Versant

- David Norman
- Nate Cota
- Tyler Stanley

Representatives from 2 or more companies engaged in the development and construction of Level 1 and Level 2 facilities in the CMP service Territory (several also work in Versant territory)

- Aaron Catterfield, Maine Solar Solutions
- Chris Byers, Branch Renewable Energy
- Kate Tohme, New Leaf Energy
- Tyler Davis, BNRG

Representatives from 2 or more companies engaged in the development and construction of Level 1 and Level 2 facilities in the Versant service territory (several also work in CMP territory)

- Todd Maynard, Maynards Electric
- Daniel Passarello, Nexamp
- Nat Haslett, Revision Energy
- Danny Piper, Sundog Solar
- Tyler Eads, SolarLogix, LLC

Any other person that the commission determines is necessary to ensure that all interests related to interconnection issues are fairly represented

- Audrey Puleio, BNRG, expertise in Level 4s
- Tyler Davis, BNRG, expertise in Level 4s

PUC Staff:

- Romain Richards, Interconnection Ombudsman
- Rikka Strong, Staff Attorney