

December 21, 2021

MAINE PUBLIC UTILITIES COMMISSION
Amendments to Small Generator
Interconnection Procedures (Chapter 324)

ORDER AMENDING RULE
AND STATEMENT OF FACTUAL
AND POLICY BASIS

BARTLETT, Chair; DAVIS and SCULLY, Commissioners

I. SUMMARY

Through this Order, the Commission amends its Small Generator Interconnection Rule (Chapter 324).

II. BACKGROUND

A. Chapter 324

Chapter 324 of the Commission's Rules establishes procedures and protocols for interconnections to utility distribution systems for small generators. The rule establishes requirements for four discrete generator categories: Level 1, Level 2, Level 3 and Level 4, including protocols for application and review procedures. Chapter 324 was last amended on March 15, 2020. *Maine Public Utilities Commission, Amendments to Small Generator Interconnection Procedures Rules (Chapter 324)*, Docket No. 2020-00004, Order Amending Rule and Factual and Policy Basis (March 6, 2020).

B. Notice of Rulemaking

The Commission issued a Notice of Rulemaking (NOR) on July 20, 2021. The rulemaking proceeding followed an Inquiry conducted by the Commission. *Maine Public Utilities Commission, Inquiry into the Small Generator Interconnection Procedures (Chapter 324)*, Docket No. 2021-00033. The Inquiry was initiated through a February 9, 2021 Notice of Inquiry and was conducted for the limited purpose of gathering information regarding (1) the screening process for interconnecting Level 2 generating facilities, and (2) potential penalties for utility non-compliance with the timing and schedule requirements of Chapter 324.

Initial comments on the NOR and proposed rule were filed by Versant Power (Versant), Central Maine Power Company (CMP), ReVision Energy Inc. (ReVision), Solar Fields, LLC (Solar Fields), the Maine Renewable Energy Association (MREA), and the Coalition for Community Solar Access (CCSA). A hearing was held on August 17, 2021. Final comments were filed by Solar Fields, CMP, Versant, ReVision, Renergetica USA Corp. (Renergetica), the Solar Energy Association of Maine (SEAM), BlueWave Solar (BlueWave), and the Interstate Renewable Energy Council (IREC).

III. COMMENTS AND ADOPTED RULE PROVISIONS

A. Definition of Level 2 Generating Facilities (Section 2(GG))

Under Chapter 324, Level 2 projects that pass certain “screens” can proceed with the interconnection process without going through additional study, which could be both time consuming and costly. The Level 2 screens and associated processes are intended as a way to allow smaller projects that are unlikely to pose safety or reliability issues for the grid to proceed with interconnection without incurring the expense and delays associated with extensive studies and process. However, with the rapid pace of interconnection applications and DG project development, issues have emerged regarding how best to balance the competing interests of Level 2 and Level 4 projects. In the NOR, the Commission proposed reducing the size of Level 2 generating facilities to 500 kilowatt or less (from 2 megawatts or less).

i. Versant/CMP Comments

Both Versant and CMP request that the Level 2 threshold be lowered to 250 kW. The utilities argue that it is nearly impossible to interconnect a generator above 250 kW without an additional level of review. Versant states that nearly every project over 250 kW in its territory has failed the Level 2 screens. Additionally, CMP states that the additional review currently called for by Section 10(D) and 10(F) is nearly identical to that of a Level 4 study.

ii. ReVision Comments

ReVision does not support reducing the size of Level 2 facilities to 500 kW and does not believe doing so will expedite the interconnection process for smaller ICGFs. ReVision also argues that reducing the size to 500 kW conflicts with “nationally recognized best practices,” as defined by the Interstate Renewable Energy Counsel (IREC). In the IREC Priority Considerations document ReVision cites, IREC says that the Federal Energy Regulatory Commission (FERC) and several states have moved away from a specific cap “to a more nuanced, table-based approach,” which allows the size limit to increase as the voltage of the line increases and if a generator is closer to the substation. Therefore, ReVision recommends that Chapter 324 incorporate a “Supplemental Review,” which resembles the table-based approach.

iii. Decision on Level 2 Threshold

The Commission does not adopt the proposed amendment to lower the Level 2 threshold from 2 MW to 500 kW. Defining the size threshold between Level 2 and Level 4 projects is a question of finding a balance between ensuring that smaller projects that are ready to move forward are not held back by the processing of larger projects, while

also ensuring that Level 4 projects have some degree of certainty about their interconnection costs.

Lowering the size threshold for Level 2 projects could make it difficult and expensive (perhaps prohibitively so) for small to medium-sized projects to be developed. While the Commission sees merit in the table-based approach discussed by ReVision, such a process would need to be developed further in a future proceeding. Thus, the Commission declines to lower the size threshold from 2 MW for Level 2 projects at this time. However, because keeping the Level 2 threshold at 2 MW could potentially affect Level 4 projects, the Commission makes this decision in conjunction with its decision to define “aggregated generation” more broadly than in the proposed rule, as described in more detail in Section III(B) below.

B. Definition of Aggregated Generation (Section 2(A))

In the NOR, the Commission proposed defining “Aggregated Generation” to exclude generation that might be in the Level 4 interconnection queue but is not in commercial operation at the time of a Level 2 generating facilities’ interconnection. The purpose of the proposed definition was to clarify what the utility may consider when evaluating whether a generating facility passes the general screening criteria. The issue of how to define “Aggregated Generation” was addressed in recent dockets as it pertains to General Screening Criteria Section 7(A).

i. MREA/CCSA Comments

MREA/CCSA recommend that the definition of “Aggregated Generation” include projects with a signed IA.

ii. ReVision Comments

ReVision supports the Commission’s proposed definition of “Aggregated Generation.” Alternatively, ReVision also proposes a definition where the utility would evaluate a Level 2 interconnection only considering projects that have paid for 100% of their construction costs.

iii. Utilities’ Comments

Both Versant and CMP recommend that “Aggregated Generation” include all Level 2-4 projects with an executed IA. CMP does not support ReVision’s alternate proposal to include Level 4 projects that have paid 100% of their construction costs. CMP states that Level 4 projects are not required to make payment until they have received ISO-NE I.3.9 approval. Therefore, CMP states this proposed definition would not allow the utility to consider large amounts of proposed generation.

iv. Renergetica

Rennergetica states that “aggregated generation” should include existing generation connected to the circuit, the proposed Level 2 project itself, and any prospective generation subject to a fully-executed IA in place in advance of the Level 2 project executing such an agreement with the utility at the same circuit.

v. Decision on Aggregated Generation

While the utilities, MREA/CCSA, and Rennergetica support including prospective generation with an executed IA as part of “aggregated generation,” ReVision supports the proposed definition in the NOR, which only included existing generation and generation from the proposing generator. However, ReVision alternatively proposed a definition where projects with IAs that have paid for 100% of their interconnection costs would be included in the definition of “aggregated generation.”

The Commission views ReVision’s suggestion as an appropriate middle ground between including all generation with a fully executed IA and the proposed definition in the NOR, which included no proposed generation other than that of the proposing generator. Thus, the Commission adopts the definition of “aggregated generation” to include all existing generation, the generation from the proposing generator, and projects with an IA that have paid for 100% of the costs associated with the interconnection.¹ Developers that have paid 100% of the construction costs have provided enough certainty that the project will reach commercial operation to be included when calculating aggregated generation.

C. Automatic Sectionalizing Devices (Section 7(A))

As noted above, Section 7(A) of Chapter 324 sets forth general screening criteria. Specifically, Section 7(A) states:

For interconnection of a proposed generator to a Radial Distribution Circuit, the Aggregated Generation shall not exceed fifteen percent (15%) of the line section’s annual peak load as most recently measured or calculated at the substation. A line section is that portion of a distribution system connected to a Customer bounded by automatic sectionalizing devices or the end of the distribution line (emphasis added).

In the NOR, the Commission asked whether the term “automatic sectionalizing devices,” is defined in the utilities’ Terms and Conditions, and if not, how it should be defined.

¹ These costs include both distribution costs and associated transmission upgrade costs pursuant to ISO-NE.

i. Versant Comments

Versant states that “automatic sectionalizing devices is not defined in its T&Cs. Versant states, however, that fused cutouts, power fuses, sectionalizers with controls, reclosers with controls, and circuit breakers with protective relays are some examples of what the Company considers to be “automatic sectionalizing devices.”

Versant states that it has purposefully chosen to screen projects at all automatic sectionalizing devices, including fuses, for three reasons: 1) the rural nature of Versant’s circuits; 2) the Company’s robust Cyme model allows for the modeling of peak loads of all circuit devices; and 3) to ensure the Company can evaluate the impacts the DERC’s may have on adjacent customers.. Versant states that it believes that, to protect adjacent customers, its engineers must be allowed to evaluate projects as is appropriate for the individual situations encountered. Versant states that the high DG penetration levels in its territory means that there will be challenging interconnection request situations and analyzing line sections based on fuses is appropriate at times.

ii. CMP Comments

The term “automatic sectionalizing device” is not defined in CMP’s T&Cs. CMP recommends the following definition:

“Automatic Sectionalizing Device” means any device that can sense and isolate a fault without manual intervention, including, but not limited to, a breaker, recloser, or fuse.

iii. ReVision Comments

ReVision states that the definition of “automatic sectionalizing device” is critical because otherwise, “the utility can easily conclude that a small Level 2 facility fails the Section 7(A) screen if it improperly defines a line section by using a fuse rather than the appropriate Automatic Sectionalizing Device.” ReVision states that the appropriate definition is addressed in the IREC Model Interconnection Procedures. ReVision cites a footnote in IREC’s Model Interconnection Procedures 2019:

Clarification of the relevant Line Section is sometimes necessary. If the point of common coupling is downstream of a line recloser, include those medium voltage (MV) Line Sections from the recloser to the end of the feeder. If the 15% criterion is passed for aggregate distributed generation and peak load at first upstream recloser, then the screen is passed. If the point of common coupling is upstream of all line reclosers (or none exist), include aggregate distributed generation relative to peak load of the feeder measured at the substation. If the 15% criterion is passed for the aggregate distributed generation and peak load for the whole feeder, then the screen is passed. A fuse must be manually replaced and is therefore not considered an automatic sectionalizing device.

ReVision states that the Commission should include a definition that clearly stipulates that an automatic sectionalizing device has automatic opening and reclosing capabilities.

iv. Decision on Automatic Sectionalizing Devices

The comments filed and made at the hearing show that the parties disagree whether a “fuse” meets the definition of “automatic sectionalizing device.” While Versant states that it considers fuses to be “automatic sectionalizing devices,” ReVision points out that IREC does not. Based on the current record, the Commission is not prepared to further define “automatic sectionalizing device” at this time. While IREC does not appear to consider a fuse an automatic sectionalizing device because it must be manually replaced, the Commission is reluctant to amend the rule when Versant has stated that not including a fuse as an “automatic sectionalizing device” poses safety concerns. Thus, the Commission declines to add a specific definition of “automatic sectionalizing device” to the rule at this time. However, the Commission expects that this issue will be more fully developed in a future rulemaking.

D. Minor System Modifications

The Commission proposed modifications to the definition of “Minor System Modifications” so that the threshold for system modifications that are minor is increased to less than 32 hours of work and less than \$30,000 in materials. This definition would apply to all Levels.

Additionally, the Commission proposed clarifying and harmonizing the “Minor Modifications” and “Additional Review” provisions applicable to Level 1, 2, and 3 projects by modifying and/or incorporating those provisions in Sections 9, 10, and 11. In the proposed rule, the “Screens Failure” provisions of Section 9(D), 10(D), 11(D) continued to include the ability of the utility, at its sole discretion, to approve an interconnection that fails one or more screens and cannot be cured through Minor System Modifications, provided that such approval is consistent with safety, reliability, and power quality, and provided that the Applicant pays all interconnection costs. That concept was also proposed to be incorporated into the “Minor System Modifications” provision of Section 11(M).

i. CMP Comments

CMP supports the increase in the work hours and equipment cost thresholds and believes these proposed revisions will increase the number of interconnection requests that can be processed and remain under the Level 2 procedures.

ii. ReVision Comments

ReVision states that the proposed definition of “Minor System Modifications” will increase the likelihood of efficient interconnection for smaller (Level 1 and Level 2) projects and further clarification will reduce ambiguity and avoid misapplication.

Revision further suggested that the definition be modified to make clear that interconnection facilities are not included as part of the Minor System Modifications.

iii. Versant Comments

With respect to the proposed modifications in Sections 10(D) and H), Versant states that it appears that Section 10(D) imposes an obligation on the T&D utilities to provide a good faith estimate of the costs of additional review and/or Minor Systems Modifications for each failed screen whereas Section 10(H) appears to require the T&D utilities to offer to perform the additional review. Versant states that requiring the T&D utilities to provide the good faith estimate of the costs of additional review and/or minor system modifications, absent a developer specifically requesting the T&D utilities to do so, will lead to unnecessary work. Instead, Versant suggests that the rule should be revised to state that upon request by the Applicant the utility will provide a good faith estimate.

iv. Decision on Minor System Modifications

The Commission adopts the proposed modifications to the definition of “Minor System Modifications” so that the threshold for system modifications that are minor is increased to less than 32 hours of work and less than \$30,000 in materials. This definition shall apply to all Levels. This is an increase from less than 6 hours of work and \$2,000 in materials for Level 1 and Level 2 applications, and less than \$20,000 for Level 3 and 4 applications.

In its comments, Versant states that it appears that Section 10(D) of the proposed rule imposes an obligation on the T&D utilities to provide a good faith estimate of the “costs of additional review and/or Minor Systems Modifications” for each failed screen, whereas Section 10(H) of the proposed rule appears to require the T&D utilities to offer to perform the additional review. Versant suggests that Section 10(D) be revised to state that only upon request by the Applicant, the utility will provide a good faith estimate of the cost of additional review.

Given that Minor System Modifications are defined as modifications that entail less than 32 hours of work and less than \$30,000 cost, providing an estimate of the cost of studying whether such options exist should not be particularly onerous for the utility to provide, and such information would likely be desired by nearly all developers that have failed a screen. Moreover, requiring the developer to request an estimate of the cost of the additional study before providing it would add an additional, inefficient step to the process.

However, upon review of the wording in Section 10(D) of the proposed rule, it is possible that the good faith estimate of costs to perform “additional review” in Section 10(D) could be conflated with the good faith estimate of the costs of the upgrades themselves (after additional review) in Section 10(H). Thus, because the intention of Section 10(D) is to require the utility to provide an estimate of the costs to conduct an additional review under Section 10(D), not for the Minor System Modifications

themselves, the phrase “and/or Minor System Modifications” that had been included in the proposed rule has been removed from Section 10(D) to ensure clarity.

As noted above, the cost thresholds for Minor System Modifications have been increased from \$20,000 to \$30,000. ReVision suggests that for a Level 2 project interconnecting to a new service, the interconnection costs are commonly between \$15,000 to \$40,000 depending on the quantity of poles required, the transformer size, and metering configuration. ReVision has suggested language to clarify that Interconnection Facilities are not part of the \$30,000 threshold for Minor System Modifications.

The Commission agrees that it was not the intent of the Minor System Modification cost threshold to include the cost of the interconnection facilities. Thus, the definition of Minor System Modifications has been further defined to clarify that Interconnection Facilities do not constitute Minor System Modifications.

E. Addition of Section 7(I)

The Commission proposed reintroducing Section 7(I), which had been removed from the rule previously, though comments had never been made regarding its removal. This section stated that, “The proposed ICGF cannot exceed the capacity of the Customer’s existing electrical service.”

i. ReVision Comments

ReVision states that the proposed reintroduction of the Section 7(I) interconnection screening criteria for Level 1 ICGFs is inconsistent with Maine’s current interconnection rules, would add unnecessary ambiguity and confusion to the interconnection process, and is contrary to national best practices. ReVision also notes that Section 7(I) screening criteria is no longer included in IREC’s procedures.

ReVision states that, in addition to the ambiguity, it is concerned that the reintroduction of 7(I) would allow utilities to interpret the proposed 7(I) screening criteria in a manner that prohibits the installation of ICGFs requiring a transformer upgrade. ReVision states that transformer upgrades are relatively common during the interconnection of Level 1 ICGFs and are largely independent of the customer’s choice in service panel sizing. ReVision states that this section could unintentionally limit the facility size of Level 1 ICGFs to 10kVA for many applications, thus subverting the Commission’s efforts to modernize Chapter 324.

ii. CMP Comments

CMP supports the reintroduction of screen 7(I), which requires, “The generator cannot exceed the capacity of the Customer’s existing electrical service.” With regard to ReVision’s concerns, CMP states that the ambiguity surrounding the definition of “electrical service” can be eliminated by adding a definition of “Customer’s Existing

Electrical Service,” which CMP proposes be the same as the definition of “Service Equipment” in the National Electrical Code:

Customer Existing Electrical Service: The necessary equipment, consisting of a circuit breaker(s) or switch(es) and fuse(s) and their accessories, connected to the serving utility and intended to constitute the main control and disconnect of the serving utility.

iii. Decision on Reintroduction of Section 7(I)

It is unclear why Section 7(I) was removed from the rule previously. CMP suggests it was a drafting error and supports its inclusion, while Revision opposes including it, stating that IREC has removed this requirement as a screen and that it creates ambiguity. There is not enough information in the record for the Commission to support reintroducing Section 7(I). This issue may be explored further in a subsequent rulemaking.

F. Further Transparency for Screen Failures

i. ReVision Comments

In its initial comments, ReVision requested that the rule be amended to require the utilities to provide eight items of additional information if an applicant fails the Section 7(A) screen. The utilities did not address this in their comments, but at the Hearing, CMP expressed concern with the confidentiality and competitive sensitivity of certain information, while Versant noted that it may be difficult to ensure the accuracy of certain information at the time of determining a screen failure.

ii. Decision

Section 10(D) of the rule has been amended to require the utilities to provide 1) its definition of the line section and identification of the automatic sectionalizing device that bounds the line section and 2) the aggregated generation of the line section when an applicant fails the Section 7(A). The Commission understands the utilities’ concerns regarding the difficulty and confidentiality of some of the information requested by ReVision but believes the two new items should be readily available to the utilities and not provide any confidentiality issues.

G. Penalties

Regarding penalties, the Commission proposed amending Section 14 to establish penalties pursuant to 35-A M.R.S. § 3482(4), which provides that the Commission shall establish by rule “financial penalties to ensure timely action” by investor-owned transmission and distribution utilities in reviewing and executing interconnection requests.

The Commission proposed setting penalties for failure to comply with timeframes listed in the rule, along with failure to comply with timelines listed in construction

schedules. For penalties related to non-compliance with timelines listed in Chapter 324, the Commission proposed that penalties be assessed on a project-by-project basis. The proposed rule required that T&D utilities provide both annual and quarterly reports. Specifically, the proposed rule provided that for the annual report, for each project that was issued a signed Interconnection Agreement in the prior calendar year, the T&D utility shall compare the amount of days set forth in Chapter 324 (days allowed), and the amount of time the utility actually took to complete each step. This results in a Days Over/Days Allowed calculation, whereby, if the Days Over/Days allowed is greater than 10%, a penalty shall be calculated.

The Commission also proposed that the T&D utility file quarterly reports regarding the Days Over/Days Allowed for projects that signed Interconnection Agreements in the prior quarter.

The Commission proposed a similar calculation for the timelines listed in an initial construction schedule issued by the T&D utility. However, this calculation would be based on all projects in the aggregate and the total MW of all projects. Additionally, the “Days Over” calculation would exclude any days that were not within the control of the T&D utility.

The proposed rule also provided that the T&D utility and Interconnection Customer may waive certain timelines for reasons beyond either party’s control.

In the NOR, the Commission sought comments on 1) whether penalties should be assessed on a quarterly basis; 2) the preciseness of construction schedules; 3) should penalties be assessed for transmission upgrade construction delays; 4) and whether the maximum penalty should be capped at \$500,000.

i. CMP Comments

CMP states that the plain language of the legislation authorizing the imposition of penalties on utilities regarding the timeliness of interconnecting generation is limited to only such failures as may hamper the procurement of certain distributed generation resources in specific Commission bid processes. Specifically, CMP states that 35-A M.R.S. § 3482(1) was amended to read:

Procurements. The commission may not procure distributed generation resources in the shared distributed generation and commercial or institutional generation market segments using the targets and procurement methods described in this chapter.

CMP says that with this amendment, the Commission no longer has the statutory authority under Section 3482(4) to impose penalties. However, the Commission still has authority under the Commission’s general authority to impose administrative penalties under Section 1508-A regarding violations of Title 35-A, Commission rules, or Commission orders.

CMP does not object to quarterly reporting but does not believe penalties should be assessed on a quarterly basis. CMP does not believe penalties should be assessed for failure to meet construction schedules. CMP states that construction schedules are inherently imprecise. CMP also notes that with respect to transmission system upgrades, there is even greater levels of uncertainty.

CMP believes that the maximum annual penalty should be capped at \$500,000.

ii. Versant Comments

Versant does not support quarterly reporting or assessing penalties on a quarterly basis. Versant states that if penalty language is included in Chapter 324, penalties should be assessed on an aggregate basis up to the point of executing the IA. Versant also sets forth a specific proposed methodology in its initial comments.

Like CMP, Versant strongly opposes penalties for construction timelines.

iii. MREA/CCSA Comments

MREA/CCSA request the Commission include the timelines associated with transmission level studies conducted by the utilities in its consideration of interconnection timeline penalties.

MREA/CCSA agree with the proposed rule that penalties should be assessed on an annual basis, but that quarterly reports would be helpful. MREA/CCSA also recommend that penalties be applied retroactively to calendar year 2020.

MREA/CCSA supports penalties for construction delays and believe benchmarks need to be established to prevent the inflation of construction schedules. MREA/CCSA recommends that construction timelines be calculated based on the date that 25% payment has been made by the Interconnection Customer in accordance with § 12(T) and consider any deviations from a standardized timeframe based on factors deemed appropriate by the Commission.

MREA/CCSA believe the Commission should include transmission upgrades in the formulation of construction delay penalties.

iv. ReVision Comments

ReVision strongly recommends that the Commission facilitate a stakeholder process to establish construction timelines to address the concern posed in the rulemaking: the inherent tendency for utilities to over-estimate timelines.

ReVision supports assessing penalties on a quarterly basis. Should the proposed penalties be adopted, ReVision recommends using a portion of those penalties to fund a solar ombudsman position that can assist the Commission.

v. Reenergetica Comments

Renergetica believes that deadlines and milestones should be treated as material terms in the interconnection agreements between the developers and the utilities.

vi. Decision on Penalties

The proposed rule suggested automatic penalties for failure to comply with timelines listed in Chapter 324 and timelines listed in construction schedules. While the Commission supports quarterly and annual reporting for compliance with Chapter 324 timelines, and annual reports for construction timelines, the Commission declines to adopt automatic penalties. However, automatic penalties could be further explored in a future rulemaking or through the consideration of service quality metrics. The Commission is satisfied that reporting requirements allow the Commission to monitor compliance with timelines and the Commission retains its existing authority to impose penalties if necessary.

Accordingly, the Commission

O R D E R S

1. That Chapter 324, Smaller Generator Interconnection Procedures is hereby amended as described in the body of this Order and as set forth in the amended Rule attached to this Order;
2. That the Administrative Director shall file the amended Rule with the Secretary of State;
3. That the Administrative Director shall notify the following of this amended rule:
 - a. All transmission and distribution utilities in the State
 - b. All persons who have commented in this rulemaking proceeding, Docket No. 2021-00167
 - c. All persons who have filed with the Commission with the past year a request for notice of rulemakings; and
 - d. The Office of the Public Advocate.
4. That the Administrative Director shall send a copy of the amended Rule to the Executive Director of the Legislative Council, 115 State House Station, Augusta, Maine, 04333-0015.

Dated at Hallowell, Maine this 21st day of December 2021.

BY ORDER OF THE COMMISSION

/s/ Harry Lanphear

Harry Lanphear
Administrative Director

COMMISSIONERS VOTING FOR: Bartlett
 Davis
 Scully

NOTICE OF RIGHTS TO REVIEW OR APPEAL

5 M.R.S. § 9061 requires the Public Utilities Commission to give each party at the conclusion of an adjudicatory proceeding written notice of the party's rights to seek review of or to appeal the Commission's decision. The methods of review or appeal of Commission decisions at the conclusion of an adjudicatory proceeding are as follows:

1. Reconsideration of the Commission's Order may be requested under Section 11(D) of the Commission's Rules of Practice and Procedure (65-407 C.M.R.ch. 110) within **20** days of the date of the Order by filing a petition with the Commission stating the grounds upon which reconsideration is sought. Any petition not granted within **20** days from the date of filing is denied.
2. Appeal of a final decision of the Commission may be taken to the Law Court by filing, within **21** days of the date of the Order, a Notice of Appeal with the Administrative Director of the Commission, pursuant to 35-A M.R.S. § 1320(1)-(4) and the Maine Rules of Appellate Procedure.
3. Additional court review of constitutional issues or issues involving the justness or reasonableness of rates may be had by the filing of an appeal with the Law Court, pursuant to 35-A M.R.S. § 1320(5).

Note: The attachment of this Notice to a document does not indicate the Commission's view that the particular document may be subject to review or appeal. Similarly, the failure of the Commission to attach a copy of this Notice to a document does not indicate the Commission's view that the document is not subject to review or appeal.