

May 19, 2023

To: Energy, Utilities, and Technology Committee
From: David von Seggern (vonseg1@sbcglobal.net)
Date: May 22, 2023
Subject: Opposition to LD1850 as written

Dear Members of the Energy, Utilities, and Technology Committee:

I am only beginning to understand the very rugged landscape of energy planning and energy legislation in the State of Maine. Although many knowledgeable people and NPO's have submitted testimony on LD 1850 (*An Act Relating to Energy Storage and the State's Energy Goals*), I wish to comment from a higher level perspective.

Now that our nation has mostly understood the threats of climate change and the important role of renewable energy in mitigating those threats, the US has lately embarked on effective programs to install and plan for renewable energy resources such as rooftop solar, solar farms, wind turbines, geothermal power plants, and more. This, however, is only part of the resources we will need to run an effective and flexible electricity grid devoid of fossil-fuel sources. It is becoming clear that storage batteries will become more and more crucial as the penetration of renewable resources becomes widespread. LD 1850 is an important response to this challenge. However, I believe it needs to be redrafted to suit the unknowns we have.

I submit that Sections 3 and 4 of LD1850 are the parts of the bill that should be retained while the other sections should await the results of those studies. Sections 3 and 4 are briefly:

Sec. 3. Maine energy storage program development.

Sec. 4. Governor's Energy Office; long-duration energy storage report.

The short-term planning for battery storage cannot be separated from the long-term planning, and the committee should consider how Sec. 3 timetable might be influenced by the results of the study commissioned in Sec. 4.

Sections 1, 2, and 6 should be removed or redrafted in a manner that awaits the results of studies in Sections 3 and 4. The underlying dilemma is: On what side should the state place energy storage — on the “generation” side or on the “transmission and distribution” (T&D) side? Logically, energy storage systems are a form of generation that can be dispatched as needed, much like natural-gas peaker plants. With time, we will

undoubtedly begin to consider them as an integral part of the grid's generation resources, perhaps all under central control. These resources can be as fine-grained as electric-vehicle batteries, small-scale pumped hydro storage, hydrogen fuel cells, or, as in this case, battery-storage facilities.

Postponing any decision to allow investor-owned utilities to deploy significant storage facilities seems prudent at this time. We should not be setting a precedent for these utilities to own a whole new segment of energy generation before the benefits or drawbacks of such a program are shown. I need to mention the upcoming general ballot referendum in the fall of 2023 to perhaps approve a takeover of investor-owned utilities in Maine — now is not the time to enhance the assets of these utilities.

Respectfully yours,

David von Seggern
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