



January 9, 2024

Senator Mark Lawrence, Chair
Representative Stanley Paige Zeigler, Chair
Committee on Energy, Utilities, and Technology
100 State House Station
Augusta, Maine 04333

Re: Testimony on LD 1465, “An Act to Amend the Calculation of Tariff Rates and Billing Credits Under Net Energy Billing”

Senator Lawrence, Representative Zeigler, and members of the Energy, Utilities, and Technology Committee:

Founded right here in Maine twenty years ago, ReVision Energy is a local, employee owned, certified B Corporation with over 480 employees across our seven branches in New England, with 268 staff in Maine at our Montville and South Portland locations. Our mission is to make life better by building our just and equitable electric future. In 2022 alone, we installed 10,000 kilowatts of residential solar and nearly 24 megawatts of commercial solar across the region—and our 2023 numbers are soon to be finalized.

We believe that an effective net energy metering is critical in reaching our state’s climate commitments and renewable portfolio standard law, and therefore we are here today in strong opposition of LD 1465. We believe that meeting our climate targets is not optional; these have been set and codified based on the best available understanding and the goal to maintain a livable planet. When we accept this is the only possible outcome, we can then work backwards to implement policies necessary to achieve that end result.

Our state has a considerable way to go on our renewable energy targets. Any suggestion that we’re building clean energy too fast is wildly disconnected from the reality we live in. To jump start the development we needed, Net Energy Billing (NEB) 1.0 was implemented. We’re the first to say it wasn’t perfect, especially in how it addressed larger offsite projects. Fortunately, you stepped in as leaders, and together, we have improved the process. ReVision has been supportive of these changes. However, the flow of new large projects has come to a standstill. When it became time to iterate holistically, you stepped in again and passed LD 936, bringing together leaders from across the clean energy sector, including nearly all parties that have commented on this bill, to provide thoughtful and strategic stakeholder input to create a policy for the future—NEB 2.0. And of course, as we all know, last session LD 1986 was passed to further reform—closing the tariff program, requiring the Governor’s Energy Office (GEO) to develop a successor program, opening potential options to reduce existing costs overall, and finally, annually calculating the programmatic benefits as well as the costs.

We respectfully ask the Committee to vote ought not to pass on this legislation—which has unclear impacts given the passage and codification of LD 1986—and again contemplates retroactivity, and instead allow the implementation of last session’s law to occur. We ask the Committee to engage and share feedback in the development of a successor program via GEO and in the programmatic cost benefit analysis to occur at the Public Utilities Commission (PUC).

In that regard, we simply wanted to raise the fact that our advocacy last session in the development of new legislation stems from our deep concern that we continue to accept utility



claims regarding programmatic costs while not comprehensively evaluating the tangible, economic benefits that distributed energy resources provide. We believe it is critical that the PUC work with its contractor and allow stakeholder input into the development of their study to ensure a clear and rigorous methodology is applied to the calculation of NEB costs and significant scrutiny is applied to multiple variables to reduce ratepayer impact. Specifically, we recommend a thorough analysis of the current queue and assumptions regarding capacity coming online, capacity factor, and tariff rates. Lastly, we look forward to seeing a comprehensive evaluation of benefits from distributed energy resources, including avoided or reduced costs associated with electricity capacity, environmental compliance, and portfolio requirements, as well as REC price suppression and transmission and distribution costs, and of course, reduced electricity prices and societal benefits through avoided greenhouse gas emissions.

Net energy billing is currently the most foundational policy for supporting distributed generation—and ultimately supplies Maine homes and businesses with the myriad benefits, including the reduction of energy costs, offered through investment in renewable energy. We recognize this policy must be a sophisticated regime that has customized applications for different market segments. For that reason, we look forward to continuing to participate in the implementation of LD 1986 and GEO's development of a new solar program, especially one that benefits LMI customers given our own mission.

Together, let's strive to meet our goals for the future of all Mainers—and their children and grandchildren, too. We ask you to oppose LD 1465.

Sincerely,

A handwritten signature in black ink, appearing to read "Lindsay Bourgoine", with a long horizontal flourish extending to the right.

Lindsay Bourgoine
Director, Policy & Government Affairs
[ReVision Energy](#)
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