

CLAYTON DAN MCKAY
Dixfield
LD 2205

Chair Lawrence, Chair Zeigler, Honorable Members of the EUT Committee

I, respectively oppose LD 2205 Resolve, to Require the Public Utilities Commission to Initiate a Feasibility Study to Evaluate Transmission Technologies and Siting Locations for Any Future Electric Transmission Line Proposed Pursuant to the Northern Maine Renewable Energy Development Program -

I open with a few numbers:

80% of the electricity used in your home is produced by natural gas, nuclear and oil. The standard offer supplier makes these purchases from the ISO-NE wholesale market to provide meaningful power.

The Maine RPS mandates the standard offer and all other competitive energy providers must prove 56.6% of their offer is from renewable energy resources. Proof is provided by purchasing RECs. So the meaningful power provided to your home is 80% non-renewables, while in addition you pay for RECs representing 56% of electricity in which only 16% is meaningful renewable electricity. 0% come from Massachusetts wind or solar projects.

In 2014, when Maine had 894-megawatt nameplate capacity wind development of the state's current 1039-megawatt nameplate capacity wind development. 57% had power purchase agreements with Massachusetts' utilities. (Maine PUC)

In 2022, Maine NEB and Tariff Rate solar development sold 64% of their RECs to Massachusetts' utilities. (Maine PUC)

In 2021, Maine SO and CEPs purchased over 70% of their RECs from Maine projects. (Maine PUC)

As for LD 2205

I fear this is intentionally meant to enable the weight of power to shift to the legislature, circumventing the duties of the PUC, the DEP and other state and local agencies involved in the decision-making process. A matter of this importance requires all measures wherein the public can have input and such input shall prevail over a select few within the confines of a legislative body, more than not, having a bias towards the decision.

I would hope, before any more effort is put forward to increase intermittent electrical generation within the State, a thorough study of what it would take the state to revert back to pre-2000 times when operations currently undertaken by ISO-NE were in the hands of utilities providing supply acquisition and delivery of electricity. Central Maine Power, Versant and the many consumer-owned utilities have vast engineering experience within their workforce. The answers to many questions could reveal if a better course of action is attainable.

Can Maine power itself with current generation resources?

Is there already too much intermittency in Maine's generation mix to provide a stable, independent grid?

Should Maine consider the option of self-preservation of land and traditional land uses?

How much influence do the policies of the other states in the ISO-NE network have on Maine's electrical systems, the costs of electricity and our unique needs and differences from the other states?

What do we expect Maine would look like considering the two options?

Would a study involving New Hampshire and Vermont as partners in a separate network from the ISO-NE network be good for the three?

Is a common border to Canada an energy asset for Maine, New Hampshire, and Vermont?

There are many more factors to be examined. But, if we do not consider this option, Maine could very well become a wind, solar and battery storage slave to Massachusetts. I believe we are at that crossroad right now as 1000 more wind megawatts would destroy any hope of a sovereign energy regime separate enough from Southern New England and ISO-NE influences to provide reasonably priced and reliable electricity.

Such a described study could be included with the study contemplated with LD 2205, using the expertise of the PUC, the Public Advocate, the Governor's Energy Office and the many stakeholders of the electric market.

As to the feasibility study proposed in LD 2205, I offer the following statements:

The PUC should not be committed to direct any requested proposal to adhere to any part or all parts of the feasibility study recommendations. The PUC will conduct proceedings to determine if a certificate of public convenience and necessity shall be approved for the selected project based on established criteria. All permit requirements sited in the original request for proposals shall carry forward to subsequent RFPs. As expressed, and emphasized in the original RFP, the following statements shall appear in all subsequent RFP(s).

The extent to which the proposed electric transmission line would affect the land, use of or enjoyment of the land, including:

- A. Ecological and other environmental impacts;
 - B. Impacts on scenic character;
 - C. Impacts on recreational uses of affected land;
 - D. Impacts on historical sites;
 - E. The extent to which any proposed route would pass through privately owned land;
 - F. The extent to which any proposed route would pass through a state-owned or federally owned nature preserve
- . Economic impacts, including
- A. A cost-benefit analysis of the proposed electric transmission line

The following statement, at the very least, should be included in the bill:

NOTE REGARDING EVALUATION OF COST: The Commission's evaluation will focus on the cost and benefits to Maine ratepayers rather than the overall costs and benefits of the project. All other factors being equal, the Commission will look favorably upon proposals that are designed to reduce costs to Maine ratepayers through some form of tariff treatment, cost recovery mechanism, cost-sharing with other states, or other means that would prevent the full cost of the Transmission and/or Generation Projects from being borne entirely by Maine ratepayers.

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