



**Testimony of Marge Kilkelly on Behalf of
the Maine Council on Aging to the Committee on
Energy, Utilities, and Technology**

**Neither For/Nor Against LD 186 - An Act to Clarify the
Public Utilities Commission's Authority to Establish
Time of Use Pricing for Standard Offer Service**

Submitted February 6, 2025

Senator Lawrence, Representative Sachs, and the members of the Committee on Energy, Utilities, and Technology.

My name is Marge Kilkelly, and I am a Policy Consultant for the Maine Council on Aging (MCOA). The MCOA is a broad, multidisciplinary network of over 135 organizations, businesses, municipalities, and older community members working to ensure we can all live healthy, engaged, and secure lives with choices and opportunities as we age at home and in community settings.

I am testifying Neither For/Nor Against LD 186 and recommend additional study to better understand the impacts on older and disabled Mainers before a Time of Use (TOU) policy is implemented.

Time of Use pricing is one tool that allows consumers to modify their use of electricity to times of day with less demand and as a result lower Kwh costs. That tool can be very effective for consumers who can limit their use of washers/dryers/dishwashers /AC units etc. to off-peak hours and save on their electric costs.

It is critical to understand that some older Mainers in their homes do not have the ability to limit electrical use of medical equipment, electric heat or AC, and therefore would be subject to the higher prices.

We believe that implementation of such a significant change in electric pricing policy requires in depth study and public input.

- Will this reduce electric costs or shift costs to those who have fewer options and resources?
- Have there been Pilot Projects designed to gather real world information on costs?
- Have the impacts on home bound or vulnerable individuals been studied?
- Will the costs resulting from implementing TOU be reflected in individual rates? How?

In December of 2025 CMP is scheduled to deliver a report on rate design offerings, we hope that the Committee will delay action on this legislation until the information in that report as well as answers to our other concerns can be addressed.

Finally, we oppose allowing this policy to be implemented without benefit of public rulemaking; we believe that public rulemaking offers the most transparent process to raise issues and allow the public to better understand the underlying facts to support changes.

Electric rate plans impact rate payers differently, we urge the Committee to take the time to fully understand how TOU would impact older and disabled Mainers before moving this legislation forward.

Thank you for your consideration.