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53 Exchange Street, Suite 200 Portland, ME 04101 **P:** 207.210.6439 www.clf.org

Testimony before the Committee on Energy, Utilities and Technology neither for nor against LD 197: Resolve, to Direct the Governor's Energy Office to Conduct a Study Regarding the Future of Electric Transmission Infrastructure in the State

March 11, 2025

Senator Lawrence, Representative Sachs, and members of the Committee on Energy, Utilities and Technology, my name is Phelps Turner, and I am a Senior Attorney and the Clean Grid Director at Conservation Law Foundation (CLF). I appreciate this opportunity to testify neither for nor against LD 197: Resolve, to Direct the Governor's Energy Office to Conduct a Study Regarding the Future of Electric Transmission Infrastructure in the State.

CLF, founded in 1966, is a public interest advocacy group that works to solve the environmental and energy challenges threatening the people, natural resources and communities in Maine and across New England. In Maine for almost four decades, CLF is a member-supported organization that works to ensure that laws and policies are developed, implemented and enforced that protect and restore our natural resources; are good for Maine's economy and environment; and equitably address the climate crisis.

The Governor's Energy Office (GEO) has recently conducted studies on the issues raised in LD 197. In January 2025, the GEO released the Maine Energy Plan, a comprehensive energy plan that covers, among other things, the status of electric transmission infrastructure and the needed planning and investments related to transmission upgrades that support the more efficient use of existing infrastructure and the expansion of new transmission infrastructure in Maine. There have been similar efforts by the GEO², as well as by ISO New England at the regional level. Two 2024 studies concerning "2050 Transmission Planning" and "Economic Planning for the Clean Energy Transition" assess the status and needs of the transmission system, including in Maine.

The work proposed under LD 197 is therefore redundant—however, if LD 197 proceeds, it must be revised in several ways to better achieve its objectives:

1. Add a provision to prohibit any effect on pending transmission activity. LD 197 should be amended to specify that the work of the stakeholder group and the preparation of the

¹ Maine Governor's Energy Office, "Maine Energy Plan: Advancing affordable, reliable, and clean energy for Maine," January 2025, https://www.maine.gov/energy/sites/maine.gov.energy/files/2025-01/Maine%20Energy%20Plan%20January%202025.pdf.

² Maine Governor's Energy Office, "An Assessment of Maine's Renewable Portfolio Standard," March 2024, https://www.maine.gov/energy/sites/maine.gov.energy/files/inline-files/Maine-RPS-Impacts-and-Procurement-Policy-Options-Report-Master-FINAL.pdf.

³ ISO New England, "2050 Transmission Study," February 2024, https://www.iso-ne.com/static-assets/documents/100008/2024_02_14_pac_2050 transmission study final.pdf; ISO New England, "Economic Planning for the Clean Energy Transition: Illuminating the Challenges of Tomorrow's Grid," October 2024, https://www.iso-ne.com/static-assets/documents/100016/2024-epcet-report.pdf.



study must not delay any electric transmission infrastructure-related work or activities, including but not limited to, transmission system-related planning, studies or upgrades and/or transmission-related procurements that are currently pending or become pending during the study period.

Proposed language: "Sec. 4. The study outlined in Sections 1-3 shall not delay or otherwise affect any electric transmission infrastructure-related work or activities, including but not limited to, transmission system-related planning, studies or upgrades and/or transmission-related procurements that are currently pending or become pending during the study period."

2. Amend the bill to include review of additional transmission analyses. LD 197 should be amended to require the review and consideration of additional analyses that directly relate to transmission infrastructure in Maine, including but not limited to, regional analyses being performed under the Longer-Term Transmission Planning (LTTP) process by ISO New England and the New England States Committee on Electricity.

Proposed language: "3. Existing <u>state and regional</u> analyses of future electric transmission needs in the State..."

3. Amend the bill to include an opportunity for public participation. LD 197 should be amended to require that, as part of developing the study, the stakeholder group should solicit and respond to feedback from the public. There is sufficient time in the proposed schedule for the study to allow for this participation, which will increase the transparency of, and accessibility to, the stakeholder process.

Proposed language: "15. An individual representing an electric transmission line developer. The stakeholder group shall hold at least one meeting open to the public."

Thank you for the opportunity to submit testimony neither for nor against LD 197.