

**Testimony before the Committee on Energy, Utilities and Technology
neither for nor against: L.D. 946, *Resolve, to Increase Access to Energy Efficiency Programs
by Low-income and Moderate-income Residents***

March 26, 2025

Senator Lawrence, Representative Sachs, and members of the Committee on Energy, Utilities and Technology, my name is Emily Green, and I am a Senior Attorney and the Director of Clean Mobility at Conservation Law Foundation (CLF). I appreciate this opportunity to submit testimony neither for nor against L.D. 946, *Resolve, to Increase Access to Energy Efficiency Programs by Low-income and Moderate-income Residents*.

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.

Although CLF strongly supports this bill's intentions, we are neither for nor against L.D. 946 because we worry the bill's broad strokes could undermine its important purposes.

CLF is not opposed to setting minimum allocations of funds toward low-income or other priority populations; doing so can advance equitable deployment of programming and ensure that priority populations see some benefit. That's why we have previously urged the Trust to allocate 40% of program funds, in alignment with federal Justice40 principles, to disadvantaged communities (and to update that allocation appropriately if and when the state defines environmental justice and achieves a new understanding of which populations warrant priority funding).

However, we have significant concerns that as drafted, L.D. 946 would have unintended consequences as well as prove so administratively cumbersome as to undermine its good intentions. For instance, section 1 would require the Trust to distribute 50% of all electric vehicle rebates to low-income and moderate-income residents (we note that as written, the 50% requirement is absolute and offers little flexibility; "at least 50%" might better effectuate the bill's aims). But this doesn't acknowledge that currently, the Trust's electric vehicle rebate program is suspended altogether *except* for qualifying low-income Mainers.¹ The program caps eligible vehicle prices and requires income-based eligibility verification for participation. Once the next triennial plan is finally approved and takes effect, the Trust's electric vehicle

¹ Efficiency Maine Trust, [Important Changes to EV Rebate Program - Efficiency Maine](#) (Nov. 1, 2024).

programming will be funded but will still be tailored to specific customers with barriers to electric vehicle uptake:

. . . the Trust is limiting eligibility to consumers for whom the program is expected to generate significant “market lift.” The market lift of the planned program is greatest for those consumer segments for whom the upfront incremental cost and/or reluctance to shift to EVs pose significant barriers. The Trust finds that these issues are significant barriers for low- and moderate-income customers (LMI), commercial customers, government entities, and non-profit organizations.²

Given the program design and the Trust’s existing focus on low- and moderate-income consumers as well as others with barriers, it is not clear how the bill would “increase access” to the rebate program—but it *could* present administrative challenges to the Trust, complicating its efforts and even slowing deployment of the popular program.

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Maintaining—and growing—the Trust’s successful programming is critical. Maine’s moderate- and low-income households face staggering home energy burdens.³ At the same time, Maine’s buildings are the second-largest emitter of greenhouse gases, contributing to the worsening impacts of climate change that threaten Mainers’ way of life (and, ironically, increase the need for more energy use in our homes). The Trust’s energy efficiency and beneficial electrification programs offer solutions to both of these intertwined problems.

CLF appreciates the Trust’s work, particularly in recent years, to ensure its programs go further to reach low- and moderate-income consumers. Yet we recognize that ensuring a just transition to a clean economy requires more (of the Trust and all other state entities). Again, CLF supports the good intentions of this bill, but we worry that it does not account for the administrative burdens and full array of consequences that it may engender. It is imperative that the good intentions underlying L.D. 946 not stand in the way of the Trust’s critical programming. CLF would welcome a report, conversation, or other process to consider, advance and deploy ways for the Trust to expand deployment of services to low- and moderate-income households (and other priority populations) and to ensure fair workforce standards in a collaborative setting, without hampering the Trust’s successful programming.

Thank you for your attention and we appreciate the opportunity to testify neither for nor against L.D. 946.

² Efficiency Maine Trust, Triennial Plan VI (Fiscal Years 2026-2028), *Beneficial Electrification Plan for Maine* (Nov. 5, 2024) at 8.

³ VEIC & Beech Hill Research, *Quantifying Maine’s Household Energy Burden and Affordability Gap, A Report to the Maine Electric Ratepayer Advisory Council* (Dec. 1, 2024) at 6.