

March 27, 2025

Senator Mark Lawrence, Chair  
Representative Melanie Sachs, Chair  
Committee on Energy, Utilities, and Technology  
100 State House Station  
Augusta, ME 04333

***Re: Testimony Neither for Nor Against LD 839***

Dear Senator Lawrence, Representative Sachs, and Members of the Energy, Utilities and Technology Committee:

Please consider this testimony neither for nor against LD 839. The Coalition for Community Solar Access (CCSA) is a national coalition of businesses and non-profits working to expand customer choice and access to solar for all American households and businesses through community solar. Our mission is to empower every American energy consumer with the option to choose local, clean, and affordable solar.

LD 839 would move the recovery of Net Energy Billing (NEB) program costs from rates to the General Fund. While CCSA agrees there is merit to using taxpayer funds to pay for some aspects of renewable energy programs, we are concerned that this bill goes too far, too fast.

There are valid reasons to re-examine funding public policy objectives through utility rates. For example, some of the benefits of the NEB program accrue specifically to ratepayers because they directly reduce the costs of operating the distribution grid. From this perspective, it is appropriate that ratepayers fund such elements related to the electric system. Other benefits from NEB apply on a societal level; for example, the environmental, economic, and health impacts of reducing greenhouse gases benefit all Mainers, whether they pay a CMP or Versant electric bill or not.

Before moving all NEB program costs to the General Fund, we think it would be appropriate to complete a thorough analysis of the impacts of the program to understand how best to allocate costs in relation to how and to whom the benefits accrue. The docket to examine the benefits of the NEB program, Case 2024-00149, is still in progress, but we expect the outcome will give better direction to the portions of the program that represent societal benefits rather than ratepayer benefits, and should be a tool in determining how to divide the costs appropriately.

Finally, and importantly, this bill also leaves a great deal of uncertainty as to how general fund appropriations would be made on an annual basis to cover the costs of the program, and what would happen if the program is not fully funded in any given year. CCSA has serious concerns

that such uncertainty could result in stranded costs, defaults on payments to distributed generation projects operating in good faith, and uncollected revenues needed to make the distribution utilities whole. A shift in the manner in which existing program costs are recovered must be more carefully thought out before adopting statutes that prohibit the existing vehicles for recovering those already-incurred costs.

Thank you for your consideration of our testimony. Please do not hesitate to reach out with any additional questions.

Sincerely,

/s/Kate Daniel  
Northeast Regional Director  
Coalition for Community Solar Access