

BLUEWAVE

April 10, 2025

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

Re: BlueWave Energy Testimony in Opposition to LD 1321 and LD 1317

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

Please consider this written testimony in opposition to LD 1321 and LD 1317.

BlueWave is a solar and energy storage developer and long-term asset owner and a leading innovator of dual-use, or agrivoltaic, projects in the Northeast. We have developed a total of 46 MW of community solar projects through the Net Energy Billing (NEB) program in Maine and are the long-term owner of approximately 23 MW of those operational projects. These projects provide savings to hospitals, municipalities, and hundreds of small and medium business across the state. BlueWave is also proud to have developed the first agrivoltaic project in Maine on a wild blueberry farm in Rockport, which was completed in 2021 and provides community solar bill credits to customers through the NEB program.

We urge the Committee to recognize the benefits of the NEB program and reject the measures outlined in LD 1321 and LD 1317. Both bills would make retroactive changes to the value of NEB bill credits, and therefore the savings that community solar subscribers receive. The retroactive changes to NEB rates proposed in both bills would also result in many operational projects defaulting on their financing obligations. For example, removing the 2.25% annual escalator for projects operating under the lower cost alternative C&I tariff rate, as proposed in LD 1317, is not financially workable. These projects have ongoing financial obligations that increase with time, including lease payments, operation and management agreements, and debt service. All of these project costs were financed assuming an annual escalator. Similarly, these projects would not be able to absorb the reduction in the tariff rate and removal of the annual escalator proposed in LD 1321.

These measures would not only harm project owners but also the Maine residents and businesses who subscribe to community solar projects and are expecting to continue receiving the benefits and savings associated with these projects. Subscribers to BlueWave's projects include hospitals, municipalities, and hundreds of small and medium businesses. These Maine people and businesses have made investments and budgetary decisions with the understanding that the NEB



program would remain in place. If NEB rates are retroactively reduced, these customers would face a reduction or elimination of their bill credits and will be unable to realize the savings they have planned for. During this period of economic uncertainty, now is not the time to cut off these benefits to Maine businesses and hardworking families.

Thank you for your time and consideration. Please do not hesitate to reach out with any questions or concerns.

Sincerely,

Elizabeth Curran
Senior Director of Policy and Regulatory Affairs
BlueWave Energy