



Chair Tepler, Chair Doudera, and Honorable Members of the Joint Standing Committee on Environment and Natural Resources, my name is Nick Sampson and I'm a Senior Project Manager for Dirigo Solar and BNRG Renewables. Our team greatly appreciates the opportunity to provide public comments on LD 269 and the Maine DEP's proposed Chapter 375 draft rules.

Maine-based Dirigo Solar, and our partners at BNRG Renewables (together "BNRG Dirigo"), have developed and financed energy projects worth over \$150 million in our State. Seven projects (in Milo, Oxford, Fairfield, Augusta, Hancock, Palmyra, and Winslow) are operational and delivering power to CMP and Versant at 3.4 cents per kWh. In 2021 alone, these projects saved Maine ratepayers more than \$3.5M, according to utility filings with the Maine Public Utilities Commission. Additionally, BNRG Dirigo has a large pipeline of projects under development that will contribute to Maine's achievement of its ambitious climate and clean energy goals.

As a Maine-based company, Dirigo is committed to developing and constructing solar in a way that benefits local communities and minimizes impacts on our natural environment. We agree with, and appreciate, the efforts to protect Maine's most valuable habitat areas in the state. However, we remain concerned that the compensation requirements for "undeveloped habitat block" impacts under the draft Chapter 375 rules will significantly slow solar energy development and the state's progress towards its clean energy goals. Specifically, in the southern and central/midcoast eco-regions we're concerned that it will be very challenging to find sites that have access to grid capacity that are also able to avoid undeveloped habitat block impacts and therefore compensation requirements which could either be prohibitive to a project or result in added costs to Maine ratepayers.

While Dirigo and BNRG are intent on siting solar projects in areas that appear to be logical locations for adding renewable energy, like brownfields, PFAS contaminated land, or in close proximity to other development, the reality is that we do not have as much control over project siting as the public may believe. Maine's transmission grid system is not nearly as robust as that of our neighboring states and lacks the capacity required to support widespread grid-scale renewables deployment. As a result, Dirigo and BNRG have been forced to kill, or not pursue, certain projects and opportunities that are ideally sited on contaminated or previously developed land. With the draft Ch. 375 rules, we are now concerned that it will be difficult to find sites that have access to grid capacity and cost-effective interconnections, that also avoid potentially prohibitive compensations fees for impacts to undeveloped areas.

BNRG Dirigo strongly supports an amendment proposed by the Maine Renewable Energy Association to increase the area requirements for undeveloped habitat block qualification. We believe this strikes a balance of protecting Maine's important natural environments while supporting responsible solar development and the state's critical clean energy transition.

Thank you for the opportunity to comment and your consideration.