

**Testimony before the Committee on Energy, Utilities and Technology  
in support of LD 1868, *An Act to Advance a Clean Energy Economy  
by Updating Renewable and Clean Resource Procurement Laws***

**May 6, 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 Director of Clean Grid at the Conservation Law Foundation (CLF). I appreciate this opportunity to testify in support of LD 1868, *An Act to Advance a Clean Energy Economy by Updating Renewable and Clean Resource Procurement Laws*.

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.

**LD 1868 will increase the already significant economic, reliability and environmental benefits generated by Maine's Renewable Portfolio Standard (RPS), which include:**

Economic benefits:

- “[T]he state’s RPS has saved Maine ratepayers more than \$21 million annually in net electricity costs by suppressing prices in the regional electricity market while supporting more than \$100 million in direct investment and approximately \$900 million in operations and maintenance spending.”<sup>1</sup>

Reliability benefits:

- Prioritizing renewable energy sources like those in the RPS is critical to ensuring Maine’s energy systems are resilient and reliable: indeed, “[i]mproved energy reliability and resiliency is achieved through the addition of renewable energy sources and load flexibility resources like batteries.”<sup>2</sup>

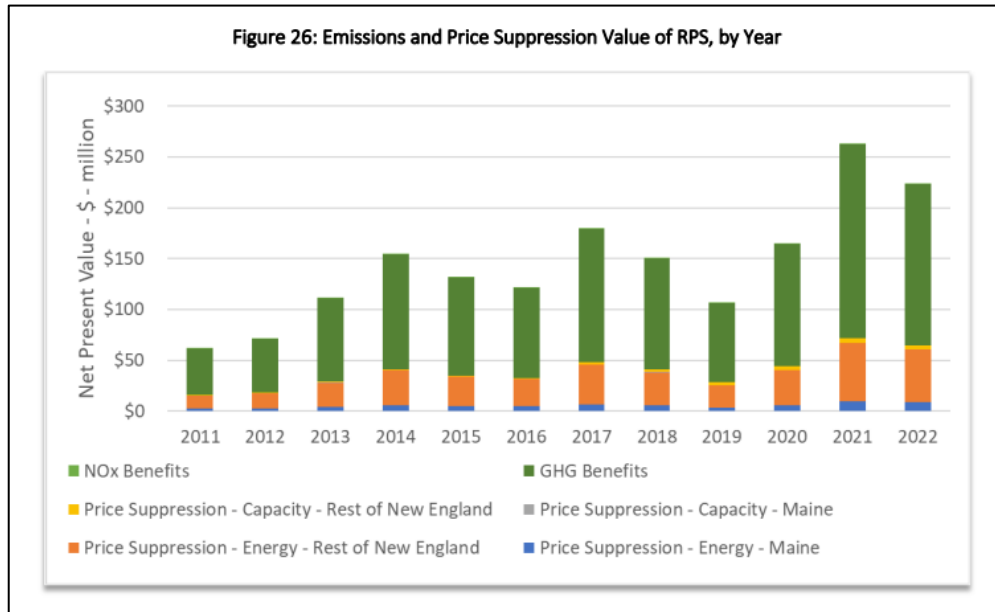
Environmental benefits:

- The emissions benefits of Maine’s RPS have been between \$50-\$150 million per year, net present value from 2013-2022,<sup>3</sup> as represented in the table below:

<sup>1</sup> Maine GEO, “Maine Energy Plan,” Jan. 2025, <https://www.maine.gov/energy/sites/maine.gov.energy/files/2025-01/Maine%20Energy%20Plan%20January%202025.pdf>, at 33.

<sup>2</sup> Maine GEO, “State of Maine Renewable Energy Goals Market Assessment,” March, 2021, <https://www.maine.gov/energy/studies-reports-working-groups/current-studies-working-groups/renewable-energy-market-assessment>, at 74.

<sup>3</sup> Maine GEO and PUC, “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>, at 30.



- “[I]ncreasing the amount of locally produced electricity from renewable generators and pairing that energy with advanced energy storage can diversify the region’s electricity supply and reduce emissions that contribute to climate change.”<sup>4</sup>

Under LD 1868, these benefits will be expanded, Maine will add clean energy jobs and Maine communities will be safer and healthier.

**LD 1868 will decrease energy burdens in Maine by lowering electricity costs overall and by lowering average annual household energy costs:**

- The Maine Pathways to 2040 analysis examined pathways to reaching 100% clean electricity by 2040 and indicated that by achieving that objective, “[t]he total cost of serving the energy needs of an average Maine household falls by about 20% from 2023 to 2050 (just over \$1,300 per-year), relative to 2023 costs.”<sup>5</sup>
- The Maine Energy Plan 2025 indicates that “[t]ransitioning from an energy system that is heavily reliant on fossil fuels to one that uses a diverse mix of local, renewable energy sources also offers long-term energy cost suppression benefits.”<sup>6</sup>

<sup>4</sup> Maine GEO, “Maine Energy Plan,” at 20.

<sup>5</sup> Maine GEO, “Maine Pathways to 2040: Analysis and Insights,” Jan. 2025, <https://www.maine.gov/energy/sites/maine.gov/energy/files/2025-01/Maine%20Pathways%20to%202040%20Analysis%20and%20Insights.pdf>, at .

<sup>6</sup> Maine GEO, “Maine Energy Plan,” at 21.

**LD 1868 can be strengthened by clarifying the clean and renewable energy targets and what constitutes a “Class III resource” or “clean resource.”**

***Targets for retail sales of electricity***

Section 5 of LD 1868 should be amended to provide that the target for retail sales of electricity from renewable resources will be at least 90% and that the target for retail sales of electricity from clean resources will be up to a maximum of 10%, as follows:

“B. By January 1, 2050, 100% 2040, at least 90% of retail sales electricity in the State will come from renewable resources and up to 10% of retail sales electricity in the State will come from clean resources.”

***Definition of “Class III resource” or “clean resource”***

Section 6 of LD 1868 should be amended to include language which requires that the definition of “Class III resource” or “clean resource” that is adopted by rule or order by the Department of Environmental Protection meet certain criteria, as follows:

“A-4. ‘Class III resource’ or ‘clean resource’ means a Class I resource, a Class IA resource or a source of electrical generation that:

(1) Generates power that can physically be delivered to the control region in which the New England Power Pool, or its successor as approved by the Federal Energy Regulatory Commission, has authority over transmission, or to the Maritimes Control Area; and

(2) Has been certified by the Governor’s Energy Office in accordance with an emissions-based definition adopted by rule or order by the Department of Environmental Protection. The definition must:

a. Include a full life-cycle analysis of the greenhouse gas emissions of combustion-based resources or technologies using the latest industry standard best practices;

b. Require emission reductions necessary to meet Maine’s climate requirements under 38 MRS s. 576-A; and

c. Include sustainability criteria and other safeguards to avoid, minimize, or mitigate potential negative environmental impacts, public health impacts, and impacts to low-income or environmental justice populations.”

Thank you for the opportunity to testify in support of LD 1868.