



October 30, 2025

Committee on Energy, Utilities and Technology
% Legislative Information Office
100 State House Station
Augusta, ME 04333

Re: Public Hearing, LD 1966 – An Act to Improve Access to Community Solar Programs in the State

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

Thank you for the opportunity to testify in **support of LD 1966 – An Act to Improve Access to Community Solar Programs in the State**. Nexamp, a national clean energy company that develops, owns, and operates community solar projects — including right here in Maine, strongly supports this legislation and appreciates the sponsor's efforts to modernize Maine's net energy billing (NEB) framework to improve program efficiency and customer experience.

Support for Utility Consolidated Billing (Net Crediting)

Utility consolidated billing, also referred to as *net crediting*, allows customers to receive both their standard utility charges and their NEB credits on a single, easy-to-understand utility bill. Under this approach, the utility collects customer payments and remits the solar portion to the project sponsor.

For NEB participants, consolidated billing simplifies the customer experience, enhances transparency, and ensures that savings are clear and visible on a familiar utility bill. For project sponsors and utilities, it streamlines data management, improves crediting accuracy, and facilitates more effective monitoring of customer usage and system performance.

Implementing utility consolidated billing will align Maine's NEB program with proven best practices in states such as Maryland, Illinois, and New York, where similar structures have successfully increased customer participation and reduced administrative friction.

Evidence from Other States and Utilities

Maine's transition to net crediting is both feasible and cost-effective — a fact demonstrated by other **Avangrid-owned utilities**, including **New York State Electric & Gas (NYSEG)** and **Rochester Gas & Electric (RGE)**.

Both utilities have successfully implemented net crediting within New York's community solar framework in a timely and efficient manner. These programs are operating smoothly today, demonstrating that such billing reforms are well within reach for utilities that share common parent companies, platforms, and technical resources with CMP.

This precedent directly refutes claims that implementing consolidated billing in Maine would require excessive time or resources. The systems, software, and institutional knowledge to deliver this functionality already exist within Avangrid's own network.

Response to CMP's Concerns

While Central Maine Power has raised concerns about the time and cost of implementing consolidated billing, these concerns are overstated. Utilities across the country have integrated net crediting systems within comparable or shorter timeframes, often leveraging existing billing software capabilities. The modest system investments required are part of the natural modernization of utility infrastructure—improvements that ultimately enhance transparency and service quality for all ratepayers.

Moreover, maintaining the current dual-billing model is less efficient and more confusing for customers. Project sponsors are capable of managing billing, but that approach introduces unnecessary administrative costs, inconsistent customer experiences, and delayed or inaccurate credit applications. Utilities already manage customer data and billing functions; therefore, they are the most logical and efficient party to consolidate billing.

Utility Billing Transparency

Nexamp also supports increased transparency in utility billing for customer-funded work on project interconnections and related system upgrades. In Nexamp’s experience, interconnection invoices frequently lack transparency, with large, undefined categories that obscure overhead and markups. Utilities often include vague “administrative” or “other” charges in invoices without explanation of what they cover or how they are calculated. This lack of detail makes it difficult to assess costs and can lead to disputes.

LD 1966 addresses this by requiring utilities to identify and describe all administrative charges on customer-funded bills. This simple step would bring much-needed clarity and oversight. Requiring clear disclosure will reduce conflict, improve accountability, and lower costs for developers and ratepayers alike.

Conclusion

By requiring utilities to offer consolidated billing, LD 1966 aligns Maine's NEB program with proven best practices that benefit customers, project sponsors, and utilities alike. It's a straightforward, achievable reform that will improve customer experience, reduce administrative costs, and strengthen confidence in Maine's clean energy programs.

For these reasons, **Nexamp strongly supports LD 1966** and urges the Committee to vote **Ought to Pass**.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicholas Bihun".

Nicholas Bihun
Utility and Consumer Policy Director
Nexamp