

October 30, 2025

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

Re: Testimony in Support of LD 1966

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

Please consider this testimony in strong support of LD 1966. 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 1966 contains several important measures that will enhance transparency, improve customer protections, and expand access to solar energy—particularly for low- and moderate-income households. Specifically, the bill:

- **Improves billing transparency** by requiring utilities to clearly describe and justify all “administrative charges,” such as those for vegetation trimming or interconnections.
- Requires utilities to **provide a full and accurate description of public policy charges** included in customer bills.
- **Expands access to community solar** by directing the Electric Ratepayer Advisory Council to identify solutions that help low- and moderate-income Mainers participate in solar programs.
- **Requires utilities to offer consolidated billing (net crediting)** for community solar subscriptions—a critical consumer protection measure.

We focus our testimony on Sections 7-10, the creation of a net crediting program. We strongly support the increased bill transparency measures and refer the committee to the testimony from the Maine Renewable Energy Association on these issues.

Net Crediting is a Needed Improvement to Maine Community Solar

LD 1966 requires utilities to offer net crediting, a method of consolidated billing by which the bill credit savings associated with the subscriber’s share of generation and the subscription fee for community solar services are incorporated into the subscriber’s standard utility bill for a nominal administrative utility fee. This is important because it will improve the customer experience for all community solar customers, but namely, it will eliminate a major barrier to low income

customers participating in community solar. The current two bill system is confusing, difficult to manage, and the community solar bill is often harder to pay than the electric bill, which can be paid in cash at many types of physical locations such as Walmarts and grocery stores. The current two bill system also makes it difficult to accommodate energy assistance benefits through HEAP. These energy assistance payments may only be applied to the utility bill, and if a community solar subscription has created a very low or \$0 balance on the electric bill, the energy assistance payment cannot be applied. Under net crediting, a customer's bill will be reduced because of community solar, but not eliminated, ensuring that state and federal energy assistance dollars can go even further. Additionally, net crediting means that customers never pay for credits that are not applied to their bill - an efficient way to address expiring credits, over-sized subscriptions, and the uneven, seasonal nature of solar bill credits.

Net Crediting is the most efficient way to implement consolidated billing

LD 1966 specifies that the utilities must use a net crediting model to derive a single bill for a community solar customer. Under net crediting, the T&D utility applies the community solar credits to the customer's bill. The full credit is applied to the customer's bill, and it is first used to pay off (i.e., clear) the subscription charge that is owed to the subscriber organization. In turn, there is no need for the electric company to collect a subscription payment, and the remaining "net credit" is used to lower the amount owed to the electric company for electricity services. The community solar provider is paid by the utility after the utility renders monthly bills for electric service to all subscribers of the project. Attached, we have provided an example customer bill with net crediting from New York as a demonstration of how net crediting works.

We have modeled the proposed net crediting structure after the method in place in the largest community solar program in the country, and the one that has had consolidated billing in place for the longest period of time - New York. Net crediting has worked in New York and has been adopted in subsequent markets because it guarantees bill savings, improves access to benefits for low-income customers, and lowers collection risks for both utilities and community solar providers. The bill specifies that the net credit is determined by a customer's savings rate, which must be greater than zero - meaning, a community solar subscription under net crediting is guaranteed to reduce a customer's bill. It eliminates collection risk because the subscription payment is automatically covered by the credit value applied to the customer's bill, so it creates no new obligations or receivables that must be collected by the utility.

Net crediting is a no regrets measure that will not incur ratepayer costs

This proposal will not add to ratepayer costs of the NEB program. CCSA supports that the costs of implementing the necessary billing system updates should be covered by community solar providers. LD 1966 assesses a 1% fee on the value of every credit applied as the mechanism for providers to pay those costs. The fee is again based on our experience in New York, which has a 1% fee, and with the intention of providing some incentive for the utilities to implement the

billing structures in the most efficient way possible. We do not propose to have ratepayers cover the costs of this added benefit to the program, but do think it is critical for there to be a check on the utilities' costs to implement, as community solar providers have no control over what those costs are otherwise.

We thank you for your consideration of this testimony, and are happy to provide any further information as helpful to the Committee.

Sincerely,

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

Sample National Grid Bill – Part 1

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SERVICE FOR
[REDACTED]

BILLING PERIOD
Mar 27, 2023 to Apr 26, 2023

PAGE 3 of 4

ACCOUNT NUMBER [REDACTED] PLEASE PAY BY [REDACTED] AMOUNT DUE
May 20, 2023 \$ 108.37

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Merchant Function	0.00140755 x 677 kWh	0.95
ESRM	0.016488 x 677 kWh	11.17
Tariff Surcharge	1.0101 %	0.45
Sales Tax	3.0 %	1.34
Total Supply Services		\$ 45.91

Other Charges/Adjustments

CDG Credit - Applied to This Bill	-71.38
CDG Subscription Fee	64.24
Paperless Billing Credit	-0.41
Total Other Charges/Adjustments	-\$ 7.55

Sample National Grid Bill – Part 2

nationalgrid

SERVICE FOR
[REDACTED]

BILLING PERIOD
Mar 27, 2023 to Apr 26, 2023

PAGE 1 of 4

ACCOUNT NUMBER [REDACTED] PLEASE PAY BY [REDACTED] AMOUNT DUE
May 20, 2023 \$ 108.37

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CORRESPONDENCE ADDRESS
300 Erie Blvd West
Syracuse, NY 13202

DATE BILL ISSUED
Apr 26, 2023

ACCOUNT BALANCE

Previous Balance	219.97
Payment Received on APR 21 (ACH) <i>THANK YOU</i>	- 219.97
Current Charges	+ 108.37
Amount Due ▶	\$ 108.37

To avoid late payment charges of 1.5%, \$ 108.37 must be received by May 20 2023.

SUMMARY OF CURRENT CHARGES

	DELIVERY SERVICES	SUPPLY SERVICES	OTHER CHARGES/ ADJUSTMENTS	TOTAL
Electric Service	70.01	45.91		115.92
Other Charges/Adjustments			-7.55	-7.55
Total Current Charges	\$ 70.01	\$ 45.91	-\$ 7.55	\$ 108.37