

LD 1730, An Act to Make Small, Portable, Plug-in Solar Generation Devices Accessible for All Maine Residents to Address the Energy Affordability Crisis

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

My name is Debra Hart, and I am a resident of Manchester, Maine. I represent the Dirigo Electric Cooperative Companies (“Consumer-Owned Utilities” or COUs), which include VanBuren Light & Power, Houlton Water Company, Eastern Maine Electric Cooperative, Kennebunk Light & Power District, Madison Electric Works, Brunswick Landing Electric Utility, Fox Island Electric Cooperative, and Isle Au Haut Electric Power Co.

The COU’s testimony on this bill is Neither For/Nor Against, however, we do feel compelled to comment on some components of this bill as amended. It is our understanding that the bill as amended is to promote the use of a specific type of self-generation that would allow consumers to bypass the typical electric supply system. We understand that consumers are concerned with high electric rates and are looking for ways to lower their bills, which was the case with people who have benefitted from net energy billing when installing rooftop solar systems. We appreciate the fact that this new technology is not seeking to increase the number of net energy billing customers, but to allow the use of small plug in systems that will either offset all or part of an individual consumer’s electric consumption.

The COUs are concerned, however, that there is little to no oversight of the individual systems that may be deployed and it seems to be pretty much on the honor system as to whether a specific ‘plug-in battery system’ meets all necessary requirements. There seems to be only a requirement that a customer ‘inform’ an electric utility that they have installed an approved system through a notification that the eligible system is in compliance. It’s also concerning that the PUC’s oversight seems to be limited to requiring a consumer to provide the PUC notification that the system is in compliance with requirements outlined in the bill.

Although we are not opposed to new innovations, it seems this bill is a far cry from "making small plug-in solar devices accessible for all Maine residents" as the title suggests. We doubt people who can not afford electricity will be in a position to take advantage of this technology absent some program that makes these available to them. It is concerning that if a large part of the population decided to 'self-generate', the remaining customers will be forced to pay more for the delivery system, which has long been a problem with net energy billing that only a few customers can truly afford.

In closing, we would like to ask the Committee to look at the following issues when you begin your deliberations on this bill. We hope you will find these helpful; we do not put them forth to be adversary but truly want to understand how this technology will work as we go forward:

- In Section 1.A.3. Could this safety device fail? And who is responsible for enforcing this? Is the burden on the utility or the customer?
- Section 3. Who will enforce zero-export to the utility? What equipment prevents this from happening and who is responsible for enforcing this? Is the burden on the utility?
- Section 3.A. Capacity should not be limited. How will this impact smaller COU's. Especially with the prohibition in section 6. At what point should the customer be required to have an interconnection agreement. If customers want to interconnect with the grid at advanced levels utilities must be allowed to require interconnection impact studies.
- Section 5 notice should be required before the installation for safety concerns.

Finally, we are concerned that there do not seem to be any consequences for failure to comply or to clarify the utilities rights to protect its system.

Thank you for your time and attention. We are happy to provide you with additional information at your work session.