



An Avangrid company

October 29, 2025

Testimony in opposition to

LD 1966 An Act to Improve Access to Community Solar Programs in the State

Senator Lawrence, Representative Sachs, Members of the Joint Standing Committee on Energy, Utilities, and Technology, my name is Kathleen Newman, Vice President of Government Affairs for Central Maine Power Company, submitting testimony in opposition to LD 1966: An Act to Improve Access to Community Solar Programs in the State

This bill perpetuates the idea that administrative charges associated with interconnection projects need additional, legislated scrutiny.

As stated in our testimony on LD 1949, administrative costs are already allocated in accordance with CMP Terms & Conditions section 1.1, where the Commission has approved CMP's use of a set administrative adder. Provisions of this proposed bill would require that utilities disclose to customers information considered proprietary and confidential. For example, the cost of procurement of materials to build an interconnection is accomplished through multi-company bids that leverage the buying power of CMP's parent company, Avangrid, to secure qualified goods and services at the lowest cost, which CMP views as a direct benefit to interconnecting customers. The Company's contracts for materials and services are confidential and thus CMP cannot share this information on a customer's bill, as doing so be a breach of contract.

The Commission evaluates and investigates administrative charges as part of any request for rate change during CMP's annual reconciliation filings. Regulatory requirements already exist to deal with cost disputes related to interconnections (Chapter 324) and line extensions (Chapter 395). The provisions in LD 1966 around cost disputes are unnecessary. CMP continues to oppose legislation which would require utilities to reimburse customers for costs that could not be line-item billed, even though those expenses were incurred by CMP and benefited that customer's interconnection.

Consolidated Billing for a Distributed Generation Resource

LD 1966 would require CMP to show customers their net savings for the solar credits (on their invoice) and then, within 30 days of invoicing the customers, pay the solar provider – regardless if the customer ever pays the utility for those solar credits.

This is unprecedented.

Currently, the Competitive Electricity Providers are not paid for providing electricity to customers until the customer remits payment to CMP. Putting CMP at risk for uncollectible solar credits is unfair and tantamount to theft of company funds.

LD 417 during the 131st Legislature sought similar billing changes to those proposed in LD 1966

and the Company's assessment of this proposed requirement has not changed. The time and cost to implement billing system changes would likely be 5-7 years and in excess of \$10M (based on rough, early estimates) which is significantly more than the potentially authorized 1% fee suggested in the bill. Pursuing this change would also require redirecting resources currently focused on other improvements and initiatives. LD 1966 does not address who pays for these system upgrades or how CMP would recover the costs of system enhancements and losses associated with customer non-payment for NEB credits. The bill requires that these billing system changes be implemented by January 1, 2027, which is not reasonable given the complete redesign and reprogramming of the billing system.

Consolidated Billing and Net Crediting puts the burden on utilities to bill, collect for and essentially finance community solar, while the actual projects reap all the profits. While there may be benefit to customers in a single bill, it may not be worth the \$10M or more it would cost to implement.

CMP believes the changes proposed to achieve consolidated billing and net crediting are cost prohibitive and would burden ratepayers even more with NEB programming and administrative costs.

CMP ratepayers would be on the hook for more administrative costs to manage the additional workload required to support consolidated billing. Creating a process to provide different saving rates for each customer, developing and managing a new standard form agreement between CMP and each DG owner that outlines the business process, billing and payment protocol, customer service and the use, testing and training required for DG owners to send and receive EDI transactions to and from CMP to implement this would require the hiring of more personnel. CMP would also need more personnel to respond to customer inquiries. Additional training would be required for all CMP Customer Relations Center employees in order to explain these new pages on the monthly CMP invoice to customers.

Data Access for Distributed Generation Resources

In compliance with prior legislation, CMP has made enhancements to the Monthly Project Sponsor report. The report now provides the kWh applied to the Current Month Invoice, kWh Banked in Current Month, Used Bank in Current Month, Expired Bank in Current Month and Total Bank. This has been a joint effort between the utilities and the DG Working Group.

Distributed Generation owners have access to customer historical usage information in a variety of platforms hosted by CMP. DG owners can use the Electronic Data Interchange (EDI) to receive up to 12 months of HU request. Suppliers can also ask and receive a username and password to obtain HU through the CMP Supplier Market Place portal. For a small fee, CMP will manually look up and email up to 24 months of historical usage to the DG owner.

Public Policy Charges

In general, the Company agrees to the concept of billing transparency so that customers understand the charges included in their electric bill. To that end, the Company added information regarding policy costs prominently displayed in the message section of the bill. LD 1966 requires the utility to provide an "an accurate and comprehensive description of all costs and benefits of public policy charges, including but not limited to, energy efficiency programs, renewable energy programs and low-income energy assistance programs."

CMP's billing system is not configured to produce individual values for cost and benefit of each component of the public policy charge. The programming of the billing system to meet this requirement would come at a significant cost while the consumer benefit is unquantified.

Overall, while the Company appreciates the intent behind billing transparency, it is not clear how the proposed changes drive improved access to community solar programs in the State as the bill title suggests. LD 1966 places unnecessary scrutiny on administrative charges associated with interconnection projects where effective and adequate regulatory oversight is already in place.

The bill seems to imagine that greater detail in presentation of public policy costs and benefits will improve access to solar. While there is no evidence of that linkage, the processes, effort, and resulting cost required to calculate and present public policy detail per customer seems to run counter to the idea of consumer savings from policy initiatives.

CMP's invoice and website currently provide the average residential cost per month for public policy costs. CMP could break out those costs by the various public policy programs in a bill print message and on our website without additional programming or development.

Thank you for your consideration of our position – we hope you will vote Ought Not to Pass on this bill.