

Senator Lawrence  
Representative Ziegler  
Members of the Energy, Utilities & Technology Committee

Re: LD 542, An Act to Comprehensively and Equitably Reform Electricity Rates

My name is Debra Hart and I am a resident of Manchester, Maine. I am providing testimony today in opposition to section 3 of LD 542, which would require consumer-owned transmission and distribution utilities to offer an optional time-of-use rate to the retail customers in its service territory. As you know, COUs represent some of the more rural areas of the State and they have few large industrial or commercial customers. A focus of the COUs is to keep their rates as low as possible for all of their customers and they have been quite successful in those endeavors with their standard offer service providers by locking those rates in for in excess of one year, oftentimes as many of upwards to five years and beyond.

Some of the COUs do not have a billing or metering systems that will support time-of-use metering, which would likely only be used by a few customers in a COU territory. In addition, because COUs are able to choose one standard-offer service provider for their entire territory, the rates they get from that provider apply to all their customers and not a separate rate for a time-of-use customer ~~ and again, one that would require a separate metering or billing system.

While we appreciate the endeavors to lower rates, in this instance we believe there would be little benefit to all of the consumers they serve in order to provide this option to a few customers who might choose this time-of-use rate.

Changing the language in Sec. 3 to read “A consumer-owned transmission and distribution utility *may* offer an optional time-of-use rate to the retail customers in its service territory” would make this permissive rather than a requirement. We would support this change or taking that sentence out entirely.

I’d be happy to answer any questions or provide you with any additional information.