



Testimony in Opposition to LD 1232
An Act to Increase Adoption of Solar Power in Maine
April 4, 2023

Senator Lawrence, Representative Zeigler and members of the committee, my name is James Cote and I am here today on behalf of Versant Power in opposition specifically to Section 2 of LD 1232.

Since 2020, Versant Power has processed more than 1200 applications to interconnect renewable energy generators and has worked with developers to interconnect more than 71MWs of solar energy to the grid. Versant Power is currently working with the owners of more than 400 active projects to integrate an additional 514+ MWs of renewable energy in northern and eastern Maine.

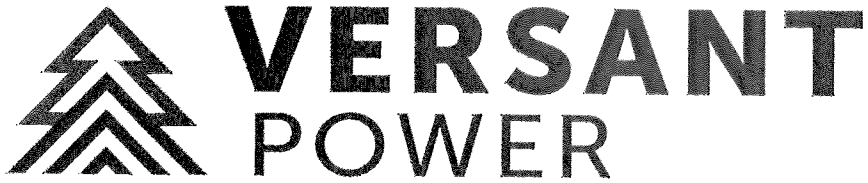
Versant Power understands that we all have critical roles to play in facilitating the major energy transitions currently underway. One of our roles is to ensure that new resources are connected efficiently, in a manner that maintains reliability for all customers, and prioritizes safety above all. We are also committed to faithfully implementing Maine's current state policy dictating that a project owner, and not other ratepayers, are to bear the costs of certain interconnection upgrades for which they are the sole beneficiary.

The technical screening of projects seeking interconnection is governed by Chapter 324 of the Public Utilities Commission's rules. These rules have been developed iteratively since the enactment of LD 1711 in 2019, including in collaboration with the Interstate Renewable Energy Council (IREC) and other stakeholders. We are unaware if IREC and other key stakeholders were consulted about these potential changes and have weighed in on their appropriateness and potential for operational reliability and safety concerns.

Section 2 of this legislation envisions quadrupling, from 25 to 100kW, the project size at which the Level 1 screening process would apply. This change would have the impact of bypassing Level 2 project screens intended to identify technical problems for numerous larger and more complex projects.

Versant Power is concerned that a reduction in screening criteria for these larger projects could put adjacent customers at unnecessary and unreasonable risk. The following questions, for example, arise:

- What if the combined (aggregated) fault current is greater than 10%, but the condition is not recognized because the Chapter 324, §7 B screen is not applied for a project (as a result of Level 1 screening processes being applied rather than Level 2 processes)?
- What if the combined short circuit interrupting capability is exceeded and not recognized because the Chapter 324, §7 C screen is not processed for the project (again, the 7 C screens are not applied to Level 1 projects, but are applied to Level 2 projects)?



There are also transient stability limit reviews (§7(G)) that must take place to ensure safe operation in areas with known stability concerns.

Should Section 2 of this bill pass as written, the reviews for such projects will be bypassed, and prevent the utility from reviewing and conducting an analysis of potential operational problems, something that will only become ever more critical as additional projects are interconnected to the grid.

To ensure that new solar installations are appropriately reviewed for safety and operational considerations, we would respectfully ask the committee to vote ought not to pass on LD 1232.

Thank you for your consideration, and we would be pleased to bring additional information to the work session at your request.