



STATE OF MAINE
PUBLIC UTILITIES COMMISSION

Philip L. Bartlett, II
CHAIRMAN

Patrick J. Scully
COMMISSIONER

Harry Lanphear
ADMINISTRATIVE DIRECTOR

Testimony of the Maine Public Utilities Commission

Neither for Nor Against

LD 1232, An Act to Increase Adoption of Solar Power in Maine

April 4, 2023

Senator Lawrence, Representative Zeigler, and Distinguished Members of the Joint Standing Committee on Energy, Utilities, and Technology (Committee), my name is Deirdre Schneider, testifying neither for nor against section 2 of LD 1232, An Act to Increase Adoption of Solar Power in Maine on behalf of the Maine Public Utilities Commission (Commission).

Section 2 of the Act mandates that the Commission amend its small generator interconnection rules (Chapter 324) to increase the capacity limit for the Level 1 screening criteria from 25 kW to 100 kW. As the Committee is aware, issues involving the operation of the grid and interconnections are extremely technical and are of utmost importance to ensure the safety, reliability, and power quality of the grid.¹ Thus, any mandates or required changes to the interconnection rules must be carefully considered. Consistent with other states and FERC rules, Maine's interconnection rules contain several "levels" of interconnection requirements that depend on the size and operational characteristics of the proposed interconnecting generators. The Commission's interconnection rules contain four levels. The specific interconnection study procedures (referred to as "screens") depend on which "level" the proposed generation project falls. The capacity limit and requirements for the rule's four levels is as follows:

- Level 1: certified, inverter-based facilities have a power rating of 25 kW or less on Radial or Spot Network systems.
- Level 2: certified generating facilities that do not qualify for Level 1; and have a power rating of 2MW or less.
- Level 3: certified generating facilities that do not qualify for Level 1 or Level 2; have a power rating of 10MW or less; and do not export power to the T&D Distribution System.
- Level 4: all generating facilities that do not qualify for Level 1, Level 2 or Level 3.

The Commission is unaware of any state that has a capacity limit of 100 kW for Level 1 projects. Currently, 25 kW is a common threshold for Level 1 projects. New York and Illinois have a higher capacity limit. New York generally allows projects up to 50 kW to interconnect without a formal screening process as long as they meet specified technical requirements. Illinois allows projects with an

¹ For the Committee's reference, attached to this testimony is the Commission's current small generator interconnection rules (Chapter 324).

export capacity of up to 25 kW and a nameplate capacity of up to 50 kW to go through a Level 1 review (which includes 4 screens).

The actual screening process and the number of specified screens depends on the qualifying requirements (such as a capacity limit) for a particular Level. Thus, if the Commission is required to amend its interconnection rules to increase the Level 1 capacity limit, it would be extremely important for the Commission to review the specific screening criteria that currently apply to Level 1 and make any necessary changes to avoid compromising the safety, reliability, and power quality of the grid.

The Commission notes that the language in Section 2 of the Act does not explicitly prevent a review of the Level 1 screening criteria. However, the bill summary specifies that the current Level 1 screening criteria and process be maintained. In the event the Committee proceeds with this bill, the Commission emphasizes that it should be clear that it retains the authority to apply its expertise in reviewing and possibly changing the screening criteria to address the impacts of larger projects and maintain the safety and power quality of the grid.

Finally, the Commission notes that it is currently conducting a proceeding to obtain input and proposals from numerous interested persons for possible amendments to its interconnection rules.² The Commission anticipates opening a formal rulemaking in the near future to consider changes to its interconnection rules. Thus, the Commission can consider changes to the screening levels and requirements in that process.

I would be happy to answer any questions or provide additional information for the work session.

² Docket No. 2022-00345.