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TESTIMONY BEFORE THE ENERGY, UTILITIES AND TECHNOLOGY COMMITTEE

An Act to Provide Maine Ratepayers with Equitable Access to Interconnection of Distributed Energy Resources
L.D. 327

GOVERNOR'S ENERGY OFFICE
May 10, 2023

Senator Lawrence, Representative Zeigler, and Members of the Joint Standing Committee on Energy, Utilities and Technology (EUT): My name is Caroline Colan, and I am the Legislative Liaison for the Governor's Energy Office (GEO).

The GEO testifies in support of L.D. 327.

The GEO appreciates the opportunity to comment on this legislation. Since taking office, Governor Mills has prioritized advancing clean energy in Maine to mitigate the impacts of climate change, reduce Maine's dependence on expensive imported fossil fuels, and grow Maine's own clean energy economy with jobs for Maine people. Increasing the number of Maine homes and businesses with renewable generation and energy storage facilities contributes toward meeting these policy goals, as well as helping to provide resiliency in the face of increasingly volatile weather and natural gas prices.

Our office has recognized the important role interconnection procedures play in facilitating the deployment of new renewable energy needed to achieve our state's requirements. Two years ago, in response to reports of significant cost changes and other unexpected delays related to interconnection agreements for distributed energy resources, Governor Mills sent a letter to the Public Utilities Commission (the Commission) requesting an investigation into the genesis of the problems reported to avoid future challenges with interconnection of distributed energy resources. Additionally, in the letter Governor Mills requested the initiation of a broader review "to ensure that Maine's electric utilities have the systems and planning in place to accommodate the growth of renewables and distributed energy resources that will allow our state to reduce our historically high dependency on high cost fossil fuels."[1]

Later in 2021, the legislature passed L.D. 1100,[2] An Act to Support the Continued Access to Solar Energy and Battery Storage by Maine Homes and Businesses. Pursuant to that act, the Commission engaged experts at the Interstate Renewable Energy Council (IREC) to "evaluate Maine's procedures and practices to ensure solar and storage projects that serve a customer's own electricity needs are interconnected efficiently and without bearing costs for distribution grid upgrades." The GEO appreciates the work of the Commission and IREC on this topic; their report was thorough, engaged stakeholders, and provides useful recommendations based on national best practices.

[1] https://www.maine.gov/energy/sites/maine.gov.energy/files/inline-files/Mills%20PUC%20Letter.pdf
[2] P.L. 2021, Ch. 264

The Commission issued a Notice of Inquiry (NOI) in late 2022 requesting comments on potential changes to its interconnection rules, Chapter 324, based on the recommendations of IREC's report. The GEO submitted comments in response to the NOI, several of which relate to portions of L.D. 327. I have attached the GEO's full comments to this testimony for the Committee's reference. Regarding this legislation, the GEO's previous comments express support for:

- The establishment of an interconnection ombudsperson role at the Commission, which we believe will improve dispute resolution and reduce costs for Maine people and businesses over the long-term, and provide equitable options for interconnecting customers that lack the resources to participate effectively in the existing dispute resolution process;
- The inclusion of specific energy storage interconnection procedures; and
- Various approaches aimed at expediting interconnection applications.

We understand that the Commission is likely to initiate a rulemaking in the near future regarding several of the topics addressed in L.D. 327. The GEO will remain engaged in the Commission's process on this inquiry, but is also open to other approaches, such as this one, to address interconnection challenges that have often led to increased costs, unpredictable timelines, and limited transparency into renewable energy development in Maine.

Thank you for your consideration.

Caroline Colan

Caroline Colan, Legislative Liaison
Governor's Energy Office

STATE OF MAINE
PUBLIC UTILITIES COMMISSION

DOCKET NO. 2022-00345

January 20, 2023

PUBLIC UTILITIES COMMISSION
Interconnection Procedures (Chapter 324)

COMMENTS OF THE MAINE GOVERNOR'S ENERGY OFFICE

The Maine Public Utilities Commission (Commission) issued a Notice of Inquiry (NOI) on December 5, 2022 requesting comments regarding "potential changes to Chapter 324 based on issues raised in the Interstate Renewable Energy Council, INC (IREC) Report in Docket No. 2022-00071," including a straw proposal (the straw proposal) the Commission attached with the Inquiry (NOI at 1).[1] The Commission notes that it intends to open a rulemaking proceeding following this Inquiry.

The Governor's Energy Office (GEO) submits these comments in response to the NOI. The GEO appreciates the Commission's initiation of this Inquiry to address changes needed to small generator interconnection procedures, and the inclusion of a straw proposal with specific proposed changes to Chapter 324 for input from interested parties.

To summarize, the GEO supports inclusion of specific energy storage interconnection procedures, enhancing dispute resolution processes particularly for small and on-site interconnecting customers, adoption of a table-based screening approach for expedited interconnection applications, and adoption of IEEE 1547-2018 standards. Additionally, the GEO encourages the Commission to use this Chapter 324 Inquiry to solicit specific interconnection-related performance metrics, as required by P.L. 2021, Chapter 702 (LD 1959). For clarity, the GEO has organized its comments following the structure of the NOI.

Background

IREC was engaged by the Commission pursuant to P.L. 2021, Ch. 264 (LD 1100, An Act To Support the Continued Access to Solar Energy and Battery Storage by Maine Homes and Businesses) to "evaluate Maine's procedures and practices to ensure solar and storage projects that serve a customer's own electricity needs are interconnected efficiently and without bearing costs for distribution grid upgrades" (NOI at 1). In the NOI, the Commission stated "pursuant to the Act, IREC also evaluated the transparency of the screening process for these projects as well as the dispute resolution process" (NOI at 2). The GEO appreciates the work of the Commission and IREC pursuant to P.L. 2021, Chapter 264 (LD 1100); it was thorough, obtained input from stakeholders, and provided clear recommendations based on national best practices.

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[1] "The IREC report" is *Interconnection Standards, Practices, and Procedures to Support Access to Solar Energy and Battery Storage for Maine Homes and Businesses. Report Prepared for the Maine Public Utilities Commission.* Interstate Renewable Energy Council. February 2022. Available online at https://mpuc-cms.maine.gov/CQM.Public.WebUI/Common/ViewDoc.aspx?DocRefId={2882E685-42B1-4280-B921-A63EBDD0BEDB}&DocExt=pdf&DocName={2882E685-42B1-4280-B921-A63EBDD0BEDB}.pdf

1. Review requirements that on-site solar and storage projects serving customer load must pay for distribution upgrades in some circumstances in light of direction contained in L.D. 1100.

a. Waiver of Distribution Upgrade Costs

P.L. 2021 Chapter 264 (LD 1100) §2 requires the Commission to ensure, based on an independent expert review (the IREC report), that "the timelines and requirements for interconnection do not unduly limit the ability of residential and nonresidential customers to install on-site solar energy generation and battery storage systems to offset a customer's electrical consumption and that interconnection costs for these customers are limited to interconnection facility upgrades and do not include the cost of distribution upgrades." To implement this directive, the Commission proposes changes to Chapter 324 that would exempt projects up to 500 kW from paying any Distribution Upgrade costs, including operations and maintenance.

The Commission requested comments on "whether limiting the exemption to projects 500 kW is a reasonable way to meet the definition in LD 1100" (NOI at 4). Instead of adopting the proposed 500 kW exemption, the Commission should establish in rule an appropriate definition related to the "on-site...systems to offset a customer's electric consumption" requirement contained in P.L. 2021 Chapter 264 (LD 1100). Chapter 313 of the Commission's rules establishes a seemingly equivalent definition of "collocated" facilities that could be instructive here: ""Collocated" means an eligible facility that is located on the same premise, property, or development area of a net energy billing customer facility or facilities that are subscribed to that eligible facility" (Chapter 313, §2). A definition for "on-site" or "collocated"[2] adopted in Chapter 324 should be modified to remove reference to net energy billing or any other specific programs that may not be relevant to all interconnecting facilities. Adopting this approach would obviate a potentially arbitrary designation of 500 kW as the limit for a distribution upgrade cost waiver, instead aligning the implementation of the distribution upgrade cost waiver with its clear intent to avoid allocating costs to projects that are intentionally planned to offset customer load on-site.

The GEO also recommends that table-based eligibility criteria for Level 2 projects be adopted as recommended on pages 37-38 of the IREC report, rather than lowering the Level 2 threshold capacity from 2 MW to 500 kW. A table-based approach better serves the intent of P.L. 2021 Chapter 264 (LD 1100) by basing screens on the capacity of the distribution system at the proposed interconnection location. Linking project capacity to location-related factors that affect the likelihood of having an adverse impact on the electric system through a table-based approach will increase the likelihood of efficiently utilizing existing infrastructure. That, in turn, may help minimize the overall cost of interconnection upgrades, reducing overall costs and enabling more renewable distributed generation consistent with P.L. 2021 Chapter 264 (LD 1100). The table-based approach is discussed further in section 5 below.

The Commission should also consider whether implementation of any cost waivers could be accomplished through a mechanism that would preserve the ability for interconnecting customers to leverage the forthcoming eligibility for certain interconnection costs to be included

[2] The GEO uses these terms interchangeably throughout these comments.

in the basis for the federal Investment Tax Credit and Clean Energy Investment Tax Credits under the Inflation Reduction Act.

b. Waiver of Distribution Upgrade O&M Costs

The GEO agrees with the Commission's interpretation of P.L. 2021 Chapter 264 (LD 1100) as intending to relieve eligible customers of distribution cost O&M charges.

c. Flat Fee for Interconnection Facilities

The Commission seeks comments on "whether a flat fee approach for the cost of Interconnection Facilities would be appropriate for customers with projects 500 kW or less as a means of streamlining the process for small projects" and specifically whether adopting a fixed $14 per kW – New York's flat fee – would be appropriate. (NOI at 5). The Commission also seeks comments on "how to recover the costs of Distribution Upgrades for projects 500kW and under" (NOI at 5).

The GEO supports a flat fee approach for all Level 1 and Level 2 projects, in conjunction with the adoption of a table-based screening approach. Flat fees are more time-efficient and thus consistent with expedited review intended for Level 1 and Level 2 projects. The Commission may wish to consider whether a flat fee should be reconciled periodically based on actual prudently incurred interconnection facility and distribution upgrade costs.

d. Distribution Upgrade Definition

The GEO supports the clarified definition of "Interconnection Facilities" proposed by the Commission.

2. The definition of "Aggregated Generation" leaves gaps in how projects will be studied and upgrade costs allocated.

As explained in the IREC report, "The issue of the definition of "Aggregated Generation" highlights the need to balance two factors: on one hand, the State's policy interest in moving the (generally smaller) solar projects serving on-site load forward with minimal delay, and on the other, the need to ensure that interconnection is an efficient and predictable process for proposed DER of all sizes" (at 20). The Commission has proposed that once a project has paid distribution costs, it will be counted as Aggregated Generation.

The GEO notes two other potential options for consideration: inclusion of projects with completed i.3.9 study results (these projects might not yet have been invoiced for all transmission costs, but may be reasonably certain to proceed); and reservation of a certain amount of capacity on each circuit for small or on-site projects, as discussed by IREC report on pages 23-24.

The GEO also notes that using a table-based approach in conjunction with a flat fee per kW cost allocation structure would streamline the interconnection process and likely reduce the number of projects that withdraw, whether formally from the Level 4 queue or by failing to move

forward after an adverse Level 1 or Level 2 screen.[3] A table-based approach would reduce the likelihood that a feasible project fails a screen and a flat fee would improve predictability.

3. The current manner in which "automatic sectionalizing devices" are defined in the screen contained in Section 7(A) results in excessive screen failure without safety and reliability benefits.

The GEO supports the Commission's proposed changes to the definition of "automatic sectionalizing device" and Section 7(A) screen consistent with IREC's recommendation and national best practices.

4. The screen contained in Section 7(E) relies on an assumption of transformer size that may be insufficiently conservative in some cases and overly conservative in others.

The GEO supports the Commission's proposed changes to the Section 7(E) screen recommended by IREC. The GEO also supports additional amendments to Chapter 324 that streamline storage interconnection consistent with IREC's best practices, as discussed further in section 9 below.

5. Level 2 eligibility is fixed at 2 MW instead of relative to the likely capacity of different feeder types.

The IREC report notes that the FERC and multiple states have moved away from a 2 MW cap for Level 2 review, to a table-based approach based on location-related factors (IREC Report at 37). IREC further notes that it has "long recommended the table-based approach to Level 2 eligibility in nearly all circumstances because it strikes a reasonable balance between taking into account factors that could limit safe and reliable interconnection of a project without upgrades, while ensuring the maximum number of small projects receive faster review" (at 38).

The Commission states that "While the table-based approach is more nuanced than a hard cap, it appears to be more complex and gives the utilities the opportunity to exercise more discretion, which could subsequently reduce transparency. At this time, the Commission is more inclined to learn from the experience of FERC and other states that have begun this approach and re-examine the table-based approach in the future. Thus, while the attached draft does not use a table-based approach, the Commission welcomes comments on IREC's recommendation." (NOI at 9).

The GEO believes transparency can be required regardless of the level of discretion available to the utility on this matter. Furthermore, as discussed above, the GEO supports IREC's recommendation that the Commission adopt a table-based approach to Level 2 eligibility (at 38-39). A table-based approach supports the public interest in minimizing interconnection costs, expanding access to renewable energy, and most efficiently utilizing existing infrastructure. A table-based approach would reduce the likelihood that a feasible project fails a static screen,

[3] The number of projects in these latter categories is presumably known to the interconnecting utilities, but not reported publicly on a regular basis to the GEO's knowledge.

and a flat fee would improve cost predictability and avoid some scenarios where one project gets stuck with "the whole tab" and needs to withdraw as a result. Reducing the Level 2 size from 2 MW to 500 kW could simply result in an increase in the number of 499 kW projects, with the same results for "leap-frogging" and queue unpredictability. Indeed, IREC states that it "is not persuaded that reducing the size limit of the Level 2 process would benefit the process and may contribute instead to more delays and potentially expose applicants to more review than is necessary to ensure safety and reliability" (at 38).

The table-based eligibility approach is consistent with best practices and broader grid modernization principles that seek to utilize existing infrastructure more efficiently. To support the Commission's laudable interest in transparency, the GEO suggests robust and standardized reporting requirements and performance metrics as discussed later in these comments.

6. Maine's Procedures lack a well-defined "Supplemental Review" process that utilities must offer to applicants.

The GEO supports adoption of IREC's supplemental review recommendations, as proposed by the Commission, to "require that utilities offer applicants who fail screening the option to proceed with Supplemental Review instead of going on to Level 4 detailed study...and that the Supplemental Review process add three new screens: the 100% of minimum voltage screen, the voltage regulation screen, and the safety and reliability screen" (NOI at 11). The Commission has also requested comments on specific technical standards to be included in the new screens. The Commission, GEO, and other interested parties may benefit from examples of recent, real-life supplemental reviews (currently named 'additional reviews') to obtain a better understanding of how the existing process is implemented and what information would be helpful to be included. The GEO would welcome an opportunity for interested parties to submit examples to this docket, such as through reply comments.

Regardless of the specific technical standards, the GEO supports clear and consistent standards and templates for the provision of required information at each stage, including information provided on interconnection screen failures discussed in section 8, below.

The GEO also recommends that the supplemental review process "allow for a short period of design change and review, as necessary, to help projects move forward quickly with minimal effects on the queue" as recommended by the national *Toolkit and Guidance for the Interconnection of Energy Storage and Solar-Plus-Storage*[4] (BATRIES Toolkit) (at 21). This would require a section in interconnection procedures that provides guidance on whether and how design changes can be accommodated without submitting a new application. IREC also recommends that "Impact study results provide an analysis of potential changes to the DER system that could eliminate or reduce the need for upgrades. Utilities should provide, at a minimum, a limited analysis of alternative DER configurations, ideally during the normal

[4] Building a Technically Reliable Interconnection Evolution for Storage (BATRIES) is a three-year project focused on developing solutions to a suite of critical barriers to energy storage interconnection to the distribution system. BATRIES is supported by the Department of Energy's Solar Energy Technologies Office and is led by the Interstate Renewable Energy Council with its partners, the Electric Power Research Institute, Solar Energy Industries Association, California Solar & Storage Association, New Hampshire Electric Cooperative, Inc., PacifiCorp, and Shute, Mihaly & Weinberger, LLP. The BATRIES Toolkit includes model rule language, which has been adopted by Commissions in other jurisdictions, most recently New Mexico. For more information, see https://energystorageinterconnection.org/

timeframe of the study process (rather than requiring restudy after study results are delivered)" (BATRIES at 20).

7. The utilities' technical requirements for interconnection may not reflect best practices and thus may unnecessarily increase interconnection costs.

IREC recommended that a technical working group be formed to address five specific technical requirements. The Commission has indicated that it does not expect to create a technical working group but instead seeks comments in this Inquiry, especially from Versant since "it appears that these technical issues are largely Versant-specific" (NOI at 12).

As a general matter, the GEO supports the recommendation by IREC related to adoption of IEEE's latest standards, IEEE 1547-2018 (IREC Report at 80), and believes this would help resolve some of the technical issues. IEEE 1547-2018 includes many new requirements that would clarify technical requirements and improve safety, including voltage and frequency ride-through and regulation, power quality, intentional islands, and new concepts including the Reference Point of Applicability (IREC Report at 81).

While IEEE 1547-2018 is not mentioned in the NOI, the GEO believes it important to develop a schedule for addressing all 1547 adoption topics whether within a working group, as recommended in the IREC Report (at 82), or on an alternative Commission-specified schedule. IREC noted that "ISO-NE has published guidelines for 1547-2018 implementation which can be followed by Maine, and which can help simplify the process" (at 82).

8. Information provided on interconnection screen failures may be insufficient to inform customers about next steps.

While "The Commission declines to adopt IREC's suggestion that the Commission convene a working group to create a standardized form for reporting screen failures" (NOI at 13), the GEO suggests that the Commission direct the utilities to jointly propose, with input from stakeholders, a standard form that incorporates the detailed information recommended by IREC. The Commission could delegate approval of such a standard form, and any updates that may be proposed from time to time, to the Director of the Electric and Gas Division.

9. Chapter 324 is not prepared to accommodate the unique features and capabilities of energy storage systems.

P.L. 2021 Chapter 298 established statewide energy storage deployment goals of 300 MW by 2025 and 400 MW by 2030. It also directed the GEO to conduct an energy storage market assessment, which was completed with stakeholder input and released in March 2022.[5] Among the policy considerations identified in the energy storage market assessment was:

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[5] Maine Energy Storage Market Assessment. March 2022. https://www.maine.gov/energy/sites/maine.gov.energy/files/inline-files/GEO_State%20of%20Maine%20Energy%20Storage%20Market%20Assessment_March%202022.pdf

"Supporting actions that ease the development process for storage resources. Stakeholders identified roadblocks to permitting, interconnection, siting, and customer identification as hurdles to storage deployment in Maine. Specific strategies to alleviate these hurdles include...

- Establish policies and guides for storage interconnection that reduce uncertainty for storage developers, as well as support utilities aligning their interconnection processes with ISO-NE to streamline the process for developers and reduce costs.
- Support updating interconnection procedures to encourage energy storage development, including, as identified by stakeholders, how storage is treated in System Impact Studies as a load during peak events instead of a generator, which can often run contrary to typical battery operations." (Energy Storage Market Assessment at 64).

The GEO urges the Commission to integrate energy storage into interconnection procedures by adopting the national best practices documented in the BATRIES report recommendations and model rule in whole, as applicable, including:

- Require utilities to update all related interconnection documents, studies, agreements, and application forms to include energy storage (i.e. whether energy storage is used, where export controls are used, and what type/equipment settings)
- Amend Ch.324 Subsection 1 "Scope" to include "These Interconnection Procedures are applicable to all state-jurisdictional Interconnection Customer Generator Facilities, including Energy Storage Systems" (adopted from BATRIES at 41)
- Insert a definition for Energy Storage Systems (ESS) that clearly states that the interconnection procedures apply to new standalone ESS and ESS paired with other generators, such as the model definition provided: "Energy Storage System or ESS means a mechanical, electrical, or electrochemical means to store and release electrical energy, and its associated interconnection and control equipment. For the purposes of these Interconnection Procedures, an Energy Storage System can be considered part of a DER or a DER in whole that operates in parallel with the distribution system" (BATRIES at 41).
- Identify a list of acceptable methods that can be trusted and relied upon by both interconnection customer and utility for both non-export and limited-export to avoid customized reviews. There is model language at BATRIES pgs. 57-59. This might fit well in Chapter 324 Section 5, "Standards for the certification of generators and interconnection equipment".
- Amend the definition of Interconnection Customer Generator Facility to mean "Interconnection Customer Generating Facility means the equipment used by an Interconnection Customer to generate, store, manage, interconnect, and monitor electricity. An Interconnection Customer Generating Facility includes the interconnection equipment required to safely interconnect the facility with the distribution system." (BATRIES at 41)
- Add a definition of Operating Schedule and Operating Profile. Model language for each is provided in BATRIES.
- Define and describe requirements and use of Power Control Systems.
- Add a question in the Interconnection Application to flag whether or not grid services will be utilized because different functionalities and technical requirements might be required (BATRIES at 24)
- In the pre-application report, require utilities to provide basic distribution system map data for substation and feeder (BATRIES at 96).

10. Construction of interconnection upgrades may not be occurring in a timely manner, resulting in delays.

IREC recommended that the Commission adopt regular reporting for small projects to ensure compliance with the timelines established in Chapter 324 (IREC Report at 63-64). The Commission "is not inclined to adopt additional reporting requirements at this time" (NOI at 13) and instead suggests that updating the interconnection agreement to "include greater level of detail regarding construction timelines may be appropriate and less burdensome" (Id at 14).

The GEO believes the Commission should both require regular reporting and require greater detail in interconnection agreements. Timely interconnection would be an appropriate performance metric well in line with the requirements of LD 1959 and other metrics discussed below.

11. Dispute resolution procedures may need improvement to resolve disputes in an efficient and fair manner.

The GEO supports establishment of an interconnection ombudsperson role at the Commission. The NOI states:

> "IREC's interviews with the utilities and developers revealed that the current process is resource intensive and that parties are concerned with the time and cost required to engage in dispute resolution. IREC Report at 66. Utilities and developers also expressed concern that Commission staff does not always have sufficient resources to resolve these disputes and that they often still result in a formal proceeding. *Id.* at 67.
>
> IREC pointed to Massachusetts and New York, which have staffed an interconnection ombudsperson to resolve disputes. *Id.* In addition to an ombudsperson, Massachusetts also has a process for resolving disputes through neutral mediators and technical experts. *Id.* at 68. IREC recommended Maine adopt a similar approach to Massachusetts, including creating an ombudsperson position, having pre-qualified set of neutral mediators and technical experts and a three-phase process for non-binding arbitration. *Id.* at 69-70.
>
> Given the costs needed to hire additional staff, the Commission declines to adopt IREC's suggestion at this time. However, the Commission seeks comments on how Section 15 of Chapter 324 could be amended to ensure that disputes are resolved efficiently. For instance, could the timeframes listed in Section 15 be shortened? Are certain steps unnecessary?"

The Commission should consider adoption of a modest per-kW fee for all Chapter 324 projects that is sufficient to fund the necessary staff.[6] The GEO believes improved dispute resolution will reduce costs for Maine people and businesses over the long-term, and provide equitable options for interconnecting customers that lack the resources to participate effectively in the existing dispute resolution process.

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[6] Reports filed by Central Maine Power and Versant Power in docket 2020-00199 indicate more than 160 megawatts of distributed generation became operational in 2022. A per-kW fee designed to fund an ombudsperson role could be modest if spread across such a volume of projects.

The Commission should incorporate development of performance standards as required by P.L. 2021, Chapter 702 (LD 1959) in this proceeding

The GEO supports public reporting by utilities regarding performance of interconnection procedures. P.L. 2021, Chapter 702 (LD 1959) instructed the Commission to adopt metrics pertaining to "distributed energy resources interconnection" among others (35-A MRSA §301, sub-§1-A (A)(4)). The Commission stated in Docket No. 2022-00052, "With respect to distributed energy resources interconnection...the Accountability Act [LD 1959] requires that metrics, standards, and reporting requirements be established. Although not included in this Chapter, Chapter 324 of the Commission's rules governs utility small generation interconnection procedures, including timing requirements for the interconnection process. The Commission may consider additional provisions and metrics in a future Chapter 324 rulemaking" (2022-00052, Order Adopting Rule and Statement of Factual and Policy Basis dated July 29, 2022 at 5). The GEO believes that this Inquiry is an opportune time to incorporate performance metrics for interconnection and encourages the Commission to request comments from all parties on applicable performance metrics that would meet the requirement of P.L. 2021, Chapter 702 (LD 1959).

The GEO appreciates the Commission's consideration of these comments and looks forward to actively participating throughout this Inquiry and subsequent rulemaking processes.

Dated at Augusta, Maine this 20th day of January 2023.

Respectfully submitted,

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