

**Testimony of Industrial Energy Consumer Group
In support of L.D. 589,
Resolve, Directing the Public Utilities Commission to Ensure That the Maine Electric Grid
Provides Additional Benefits to Maine Ratepayers
January 11, 2024**

Good afternoon Senator Lawrence, Representative Zeigler, and members of the Energy, Utilities & Technology Committee. I am Benji Borowski, an attorney at Preti Flaherty testifying in support of LD 589 on behalf of Industrial Energy Consumer Group. IECG was significantly involved in and supportive of the Beneficial Electrification Policy Act enacted last year.

IECG supports the concept of a beneficial load study because consumers have a vital but overlooked role in beneficial electrification. We think a focus on consumers, not generators and not utilities, will emphasize the role that they can play through technologies, practices, rate design, and simply just their location on a given circuit, to increase the efficiency of the grid, to lower rates, and to lower emissions.

Beneficial electrification is dynamic. Adding and managing load is essential to driving electric rates down. In turn, lower rates will ensure heat pump and EV adoption at the pace and scale necessary to mitigate climate change, while sustainable commercial activities and manufacturing also play a part.

In general, we have sufficient excess capacity on the distribution grid now and for the immediate future. That's because the grid was designed for peaks that are rarely reached. In the future, however, one that we need to plan for today, load growth should be encouraged on circuits with excess capacity and with no immediate need for expensive and counterproductive grid upgrades. Conversely, load growth should be carefully managed on circuits close to their maximum capacity and avoided on circuits that are at maximum capacity—at least for as long as possible.

IECG believes that Efficiency Maine has a firm handle on smaller-scale load associated with heat pumps and EVs. A load study should prioritize large-scale loads—for example, where does the State want to encourage new or expanded manufacturing centers, commercial activity, data centers, etc. In this regard, we believe that further tweaks to the Sponsor's amendment may be necessary to ensure this study is consistent with Efficiency Maine's on-going work and the Commission's ongoing grid planning activities. IECG is happy to work with EMT, the Commission, and others to develop such language.