Chair Lawrence, Chair Sachs, Other Honorable Members of the EUT Committee and the people who are gathered here, and those listening and viewing by internet.

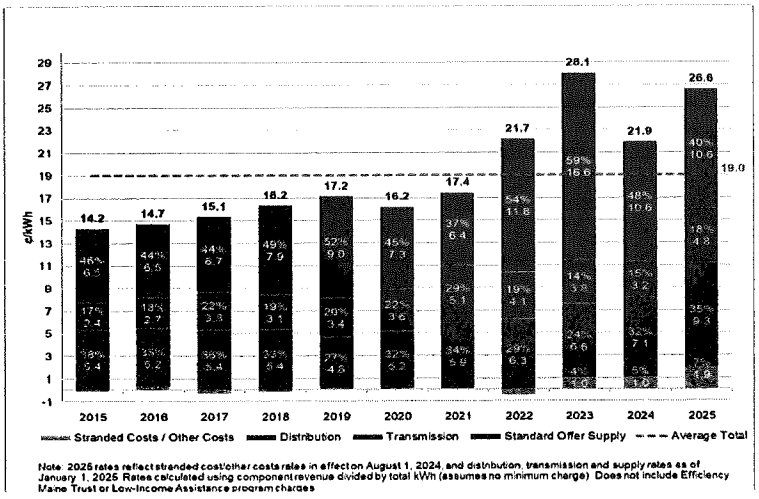
I am here to provide testimony in favor of **LD 32 An Act to Repeal the Laws Regarding Net Energy Billing** and **LD 257 An Act to Eliminate the Practice of Net Energy Billing**

I will also offer thoughts concerning actions to correct the future unjustified costs that would be imposed on certain ratepayers, even with the repeal of NEB.

1. **The Legislature has problems** with Net Energy Billing (NEB), the PUC has problems with NEB, the Public Advocate has problems with NEB, oddly, some NEB developers even have problems with NEB and, certainly, all ratepayers unsoiled from the NEB siren song, including residential class customers to large transmission class customers have problems with NEB. Is there anyone who hasn't problems with NEB? Follow the money, follow the money, follow the money, you will find the few who love NEB.

2. **The PUC** classifies NEB as a stranded cost. The PUC lists stranded costs as 7% of CMP residential electric bills in 2025 (1.9 cents per kilowatt hour). The PUC describes stranded costs: " Stranded costs include the impacts of long-term contracts for renewable power as well as the net energy billing programs created by the Legislature to facilitate the transition to renewable power.'

CMP Historical Prices By Component



3. **Long-term contracts** had a net cost to ratepayers of $17,781,554 from December 1, 2023 to November 30, 2024. An additional $140,000,000 from Net Energy Billing may be factored into rates in 2025. The OPA recently commented that **" According to the latest monthly reports from the utilities, the rate impact of NEB is well over $200 million when accounting for current rates and transmission revenues"** Case No. 2024-00356.

4. **Since 2022**, the PUC has wrestled with stranded cost and rate class allocation. Case 2022-00160 had 92 filings and 6 data requests, this case was subsequently closed and Case 2023-0023 was opened. This case had 166 filings and 10 data requests before closure. Now, the open case 2024-00137 so far has 290 filings and 10 data requests. The PUC argues that all rate

classes and NEB customers should be involved in paying for NEB. How to do it so everyone is happy is proving to be a big,big problem.

5.**Commissioner Philip L Bartlett**, during a proceeding of stakeholders and regulators in case no. 2024-00137 brought up an interesting consideration; If the generators are using the system significantly with the "pumping" of electrons onto it, perhaps they should accordingly be paying more for NEB. The conversation derives from case no. 2024-00137, filing item no. 275, 1/17/2025, TRANSCRIPT 1/10/2025

MR.BARTLETT is Mr, Philip L Bartlett II, PUC Commissioner and **MR. GORDON** is introduced as an employee of CPV (CPV has 4 wind projects in Maine) TRANSCRIPT:Page 62 to Page 64

MR. BARTLETT: Would you agree, I mean, that given that these are public policy charges, they're advancing a public policy objective, that everybody should be contributing something towards those costs

MR. GORDON: Absolutely. Absolutely.

MR. BARTLETT: Okay.

MR. GORDON: And we've said all along that we're very willing to pay our fair share of what those are.

MR. BARTLETT: But in your view, your fair share is pretty de minimus? It's only based on the very few kilowatt hours you're using?

MR. GORDON: It's equivalent to my usage of the electric system, yes.

MR. BARTLETT: But -- well, so that's an interesting -- because your usage of the system, you're -- there's a difference, I think, between the amount of consumption versus your use of the system because you're -- I mean, aren't you

connected at a high voltage because of the fact that you're pumping electrons onto the system?

MR. GORDON: Which makes it --

MR. BARTLETT: Which makes you a high user of the electric system, certainly of the transmission system.

MR. GORDON: Yes, as a producer of electricity which ultimately, at the end of the day, is beneficial all around to folks in Maine.

MR. BARTLETT: Right. And it's beneficial particularly based on the policies that the legislature has put in place supporting renewable energy and greenhouse gas reductions.

MR. GORDON: Okay.

MR. BARTLETT: I mean, is that fair?

MR. GORDON: That as a generator, I use the transmission system?

MR. BARTLETT: That as a renewable --

MR. GORDON: -- service the load, yes.

MR. BARTLETT: Yeah. But you're describing the benefits you're providing to the state of Maine which are, in significant part, because of the renewable policies that the state has adopted.

MR. GORDON: Yeah.

MR. BARTLETT: So, I mean, isn't a hybrid -- some sort of a hybrid approach, some combination of a fixed -variable rate a better reflection of the contribution -- or the benefit -- the contribution that individual ratepayers should be paying?

MR. GORDON: Are you asking whether, as a generator, I should be paying a share of the NEB?

MR. BARTLETT: Yeah, as a user -- I think as a -- yeah, as someone connected to the system.

MR. GORDON: I completely disagree with that premise.

MR. BARTLETT: So you don't feel like you should be paying -- that generators should have to contribute towards the public policy cost of the state?

MR. GORDON: Only in the sense that it is a user -- as a consumer of electricity on the system.

MR. BARTLETT: So we're backing away from the idea of somebody using the system, but you --

so you limit it to consumption?
MR. GORDON: I limit it to consumption.

6. **The Legislature** has amended 35-A MRS subsection 3209-A and 3209-B, 8 times. And amended 35-A MRS section 3210, 4 times. Maine Statute 35-A, subsection 3209-A allows the PUC to evaluate NEB when the total amount of generation capacity involved in NEB in the State reaches 10% of total maximum peak load of T & D utilities. CMP's last NEB summary statement has NEB at 52% of maximum peak load. (case no. 2020-00199 Item no.147) Sorry to say, but NEB solar does not deliver 52% of the total electricity load to CMP customers. It delivers 15.5% , and it delivers disruptive energy in many cases.

7. **The fight over NEB and the ownership of Renewable Energy Credits (RECs)** are heating up in case 2024-00251.

8. **The battle over expired NEB credits and equitably monetizing them** is brewing in Case No. 2024-00356. The ratepayers never get a break and this case is yet another indication of how little consideration they receive from legislation. This case does reveal some facts about the numbers of subscribed customers to NEB facilities that offer subscriptions. CMP, on January 27,2025 offered the following: ":***49 out of 67 total accounts were fully subscribed, meaning every kilowatt hour generated by the facility was allocated to a customer account. Six projects allocated 0-5% of their credits to their facility account. Seven projects allocated between 5-10% of their credits to their facility account. One project had 29% of their credits allocated to their facility account. Three projects allocated between 10-50% of their credits to their facility account and Two projects allocated over 50% of their credits to their facility account. 849,519 kwh of expired credits were allocated to facility accounts.***"**849,519 kwh** could have been associated with a customer's account, but were not. A trend that the interest in saving money that mostly comes from other non-participating customers is waning. I congratulate everyone that sees the indecency of this law and refrains from participating.

9. **The case of investigating benefits of Distributed Generation (DG) under NEB**, which, as of today, has 89 filings and 10 data requests, doesn't look like it is coming to a conclusion any time soon. Case No. 2024-00149

10.**Maine Public Utilities Commission Report on the Effectiveness of Net Energy Billing in Achieving State Policy Goals and Providing Benefits to Ratepayers Pursuant to An Act To Promote Solar Energy Projects and Distributed Generation Resources in Maine (P.L. 2019, Chapter 478) Presented to the Joint Standing Committee on Energy, Utilities and Technology November 10, 2020**
Ratepayer Impacts " Maine's ratepayers that participate in the State's NEB programs do realize benefits through reductions in their utility bills. The Commission notes, however, that, based on the structure of arrangements observed to-date in marketing materials for NEB facilities, it appears that NEB customers will receive a small portion of the value associated with their share of the facility (e.g.,10%-15%), while project developers or sponsors who will finance and construct the facilities receive the remaining value (e.g., 85%-90%). Moreover, individual ratepayer savings resulting from participation in the NEB program will be offset to a substantial degree by rate increases resulting from lost utility revenues that are ultimately paid for by the general body of ratepayers."
"The Commission notes that nearly all of the NEB projects proposed after the enactment of the Act are

solar projects. The substantial increase in the number and size of NEB projects resulting from the Act serves to promote State policies of enhancing resource diversity by increasing renewable power development, increasing solar installations and reducing electric sector greenhouse emissions. However, the resulting substantial increase in electric rates from the NEB program if the pace of development continues under current law (discussed above) may have a serious negative impact on enhancing beneficial electrification and reducing oil dependence to the extent it changes the financial impact of switching fuels. Because the electric power industry contributes only 7% of the State's CO2 emissions while the Transportation and Residential sectors contribute 54% and 19%, respectively, rate increases that impede beneficial electrification efforts in transportation and residential heating would be detrimental to the State's CO2 reduction goals."
"A. Rate Impacts The Commission recommends that the Legislature consider some form of a cap on ratepayer exposure to increased costs. Such a cap could be in the form of a limit on the total MW allowed under the program, a limit on the Tariff Rate program rates, or a ratepayer dollar increase limit."
2020 PUC Annual Report, Section 5, ELECTRIC-THE ELECTRIC INDUSTRY IN MAINE"The Commission also concluded that the current NEB program will result in substantial increases in electric rates. Such rate increase might have a negative impact on the State policies of promoting beneficial electrification and reducing oil dependence."
CMP testimony LD1711, An Act to Promote Solar Energy Projects and Distributed Generation Resources in Maine May 16, 2019
"It is important to avoid unjust and unreasonable cost shifting and bill impacts on all customers."

11. **Value of solar subject to the competitive ISO-NE wholesale market**: While solar resources increased day-ahead offer quantities following DNE implementation, cleared day-ahead quantities have increased at a slower rate. Between December 2023 and February 2024, day-ahead cleared quantities were similar in magnitude to those of the prior winter, and most capability was offered at a price greater than $30/MWh and did not clear. Between March 2024 and May 2024, solar generators increased the quantity of capability offered in the $0/MWh - $30/MWh range, and the quantities that they cleared in the DAM continued to increase slowly. In Summer 2024, we observed a significant increase in solar generators offering and clearing in the DAM, with cleared quantities offered, on average, in the $0 - $30/MWh range. (ISO-NE Summer Quarterly Report 2024)

12. **SOME HISTORY OF THE FORMATION OF SOLAR POWER POLICY**

Testimony of PUC Commissioner Vannoy on LD 1649 An Act To Modernize Maine's Solar Power Policy and Encourage Economic Development, March 16, 2016. "if the intent of the Legislature is to obtain the most solar generation at the lowest cost to ratepayers, it may want_to emphasize larger grid-scale and community solar projects, rather than adopt high mandatory targets for small roof-top installations. It is recognized that larger solar projects, due to economies of scale, can provide a large amount of solar generation at a significantly reduced price. The Department of Energy's sunshot data indicates that grid scale installation costs are about half that of residential installations. Non-consuming ratepayers still bear these costs, but at a lower impact than perhaps a more costly and less efficient residential buildout program."

Testimony of Patrick Woodcock on LD 1649:

1) Price of the Contracts. To achieve the legislatively mandated markets for each solar segment, the Legislature will be requiring contracts to be signed Well beyond market rates with no restriction on price. In other mandates the Legislature included caps on prices to protect ratepayers. This legislation does not include price protections. ***Recommendation: The Energy Office would recommend include price caps on contracts signed, e. g. Community Renewable Energy Program.***

2) Length of the Contracts. Each market segment requires contracts of 20 years. Contracts of this length inherently increase risk. ***Recommendation: The Energy Office would recommend reducing the duration of the contracts to no longer than 10 years.***
3) Size of the Residential Market. The legislation would mandate that ll8MW of capacity be installed in the state by 2022. Currently, the state has roughly l2MW. It is likely that pricing in this segment would yield the highest prices for ratepayers. The Energy Office does not believe these are realistic numbers and has strong concerns with the underlying foundation that projects these numbers under an assumption that net-metering would continue in its current form by 2022.***Recommendation: The Energy Office would recommend reducing the size of this segment.***

Lisa Smith, Governor's Energy Office, Testimony LD1649) Solar proponents assert that Mainers want renewable energy, including solar, but when offered the choice, ratepayers are not in favor of paying more for the privilege. Mainers can already choose to purchase electricity generated from renewable sources; it is called the green power option. It is available to all customers in CMP and Emera service territories; it is easy to sign up for; and, it costs 1.5 cents/kwh more than the standard offer of 6.5 cents. This 1.5 cents is not subsidized by other ratepayers; it is not hidden in the t&d portion of their electric bill. So, customers know exactly how much going green will cost them. Of the approximate 767,000 customers for whom this option is available, 2,000 have signed up. From these numbers, it would seem that not a significant number of Mainers are inclined to pay more for electricity generated from renewable sources. ***Recommendation: The Energy Office is in favor of market based compensation mechanisms outlined in the Public Advocate s white paper. If the committee decides to move forward with a proposal, we recommend reducing the subsidy that all non-solar ratepayers will be required to Pay.***
2) This bill would allow all residential, small business, and community solar enrollees to discount 100% of their bill, even fixed monthly charges. During the stakeholder process, there was considerable discussion about cost shifting associated with net metering. Where non-solar ratepayers are subsidizing solar generators and solar proponents dismissed this cost as negligible. Because net metering is not price-transparent, non-solar customers are not aware they are subsidizing solar customers. However, net metering in Maine, for all its flaws, does not permit solar customers to eliminate the fixed monthly charge on their bill. This bill does. In CMP territory, for example, that charge is $138 per year. Assuming the 118 MW of rooftop solar planned in this bill comes from installations of 5kw (average home-sized installation), that would mean that 23,600 new customers would not pay the minimum fee, leaving other ratepayers to pay $3.25 million each year. If We add to this a portion of community solar customers, who would also be eligible to net their bill to zero, the cost could very easily reach $4 million or more annually. ***Recommendation: The Energy Office would recommend requiring all solar customers to continue to pay their fixed monthly charges, and not allow them to use bill credits to net their bill to zero.***
3) The bill provides very large subsidies for rooftop solar, which means electric ratepayers are guaranteeing a twenty year revenue stream to this one segment of one renewable industry. In recent years there have been many proposals to use the electric ratepayer as a mechanism to support specific industries and types of development, including paper mills, wind projects, hydropower, tidal energy, biomass, and Waste-to-energy, to name a few. This proposal does that for the rooftop solar industry. The Energy Of ce does not believe electric ratepayers should be required to guarantee the financial success of any one technology or industry. ***Recommendation: If this bill moves forward the Energy Office would recommend reducing the size of the rooftop solar segment, and shortening the length of the contracts.***

13.**Versant Power provides an update to its Threshold Report pursuant to Section 3(P)(1)1 of**

Chapter 313 of the Commission's Rules. The cumulative capacity of the generating facilities, which have an executed Interconnection Agreement and the project developers/owners have indicated an intent to participate in one of the NEB programs under Chapter 313, has now reached 171% of the peak load in Maine Public District (MPD) and 102% of the peak load in Bangor Hydro District (BHD).2 The peak percentages are based on the 2023 peak demand values as reported in the company's FERC Form 1 filing, submitted March 29, 2024.

Versant operational projects: NEB and Tariff Rate Projects: (Case no. 2020-00199, Item no. 148) 315,551 kw capacity up to 12-31-2024,Including active, non operating projects and pending projects = 450,689 kw cap.

CMP operational projects: NEB and Tariff Rate Projects: (Case no. 2020-00199, Item no.147), 867,265.33kw up to 12-31-2024, Including non operating projects and pending projects =1,119,346.62kw.

How much rate impact are you comfortable allocating to the existing program?

NEB Capacity (MW)	~Cost/year ($ Millions)	Estimated Delivery Rate Increase %
250	38.35	5%
500	76.69	10%
750	115.04	15%
1,000	153.39	20%
1,250	191.74	26%
1,500	230.08	31%
2,000	306.78	41%
2,500	383.47	51%

PUC Presentation to EUT, April 1, 2021

14. **In Case No.2020-00199,** CMP and Versant lists 115,810 participating accounts in NEB.This represents about 14% of all accounts. (846,284 accounts total).If NEB costs were paid wholly by those who participate, it would add about $100 per month to their bills. What you must realize, as rates go up, partially caused by NEB policies, NEB participants receive a concurrent increase in payout. AS the number of NEB projects grows, the growth adds kilowatt hours subject to payment. This growth must be dampened and a complete repeal of NEB would do that in the simplest, quickest and fairest way. After repealing the NEB, as legislators, you must allocate more NEB costs to developers and participants which would reduce costs for those that CHOSE not to participate. I choose to follow the thoughts of Commissioner Bartlett, payment made by using the system.(i.e.:the generation side)

15. **A thought about carbon dioxide**, the multi-trillion dollar so-called villain driving the green stuff. Suppose, in God's grand plan, he determines a changing climate will exist and when it cools, carbon dioxide concentrations will lower and man will see my power and the plants will wither, and when it warms, carbon dioxide levels will increase and man will flourish and see my mercy and the plants will grow.

16. LD 32 repeals the NEB program. **Problem(s) solved**

Operational Capacity of NEB and Tariff Rate Projects Per Year and Peak Load Per Utility

Year 2020
Versant 15.3 MW Peak 382 MW
CMP 84.4 MW Peak 1708 MW
Total 99.7 MW

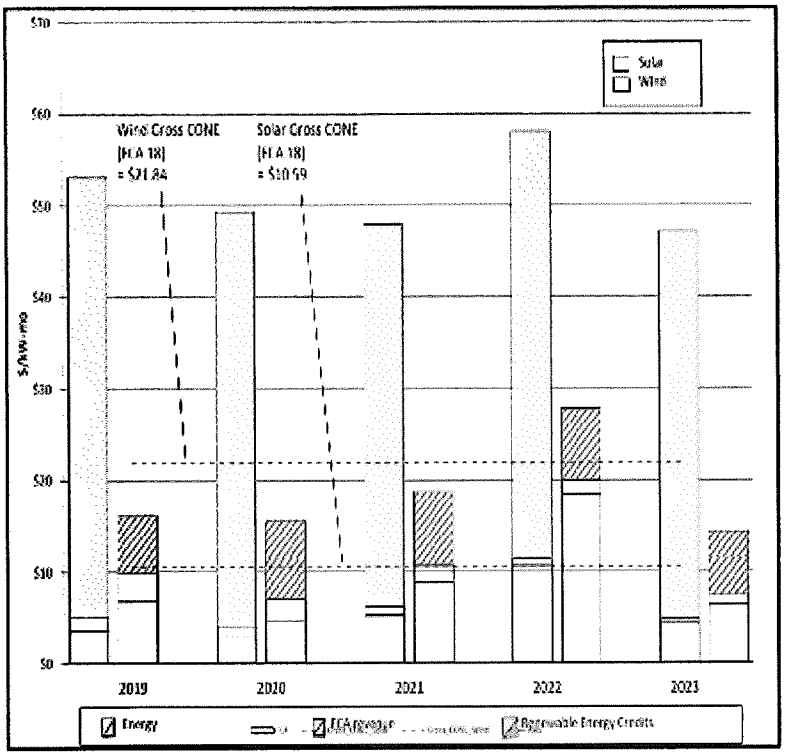
Year 2021
Versant 26.3 MW Peak 405MW
CMP 144.9 MW Peak 1810 MW
Total 171.2 MW Up 72%

Year 2022
Versant 43.9 MW Peak 408 MW
CMP 291.9 MW Peak 1638 MW
Total 335.8 MW Up 96%

Year 2023
Versant 111.5 MW Peak 390 MW
CMP 550.6 MW Peak 1624 MW
Total 662.1 MW Up 97%

Year 2024
Versant 315.6 MW Peak 386 MW
CMP 867.3 MW Peak 1665 MW
Total 1182.9 MW Up 79%

Figure 1-17: Estimated Net Revenue for Solar- and Wind-Powered Units



The profitability of wind and solar units in the region is intricately linked with state policies, with both resource types generally relying on additional revenue streams to those in the wholesale markets to be economically viable. Between 2021 and 2023, the solar unit would have earned 80% to 90% of its revenues from the sale of renewable energy credits; similarly, 30% to 50% of the wind unit's revenue would have been attributable to RECs. While these policies help to meet the region's clean energy targets, their economic impact on market prices and their operational strategies require careful consideration to maintain market efficiency and reliability.(For example, energy market prices may be distorted, with negative clearing prices prevailing whenever solar or wind units benefiting from these policies are marginal). 2023 Annual Markets Report PG 51-52 ISO New England Inc.

Table 6-1 shows the range of average wholesale market costs for calendar years 2013–2023 among the New England states and the range of residential retail power supply rates in effect immediately thereafter (i.e., on January 1 of each year) for each of the states with unbundled retail electricity markets.

Table 6-1
Wholesale Market Costs and Residential Retail Power Supply Rates (¢/kWh)[a][b]

	Wholesale Market Costs (¢/kWh)	Date Residential Retail Power Supply Rates in Effect	Residential Retail Power Supply Rates[c] (¢/kWh)
2023	4.80 - 5.29	January 1, 2024	10.83 - 17.74
2022	10.51-10.89	January 1, 2023	17.47 - 29.28
2021	6.63 - 6.75	January 1, 2022	9.82 - 15.18
2020	4.82 - 4.88	January 1, 2021	6.41 - 11.97
2019	6.13 - 6.20	January 1, 2020	7.24 - 13.11
2018	7.48 - 7.81	January 1, 2019	8.92 - 13.51
2017	5.36 - 5.68	January 1, 2018	7.83 - 12.61
2016	4.11 - 4.37	January 1, 2017	6.64 - 10.36
2015	5.43 - 5.78	January 1, 2016	6.56 - 11.85
2014	7.53 - 8.27	January 1, 2015	7.56 - 15.56
2013	6.75 - 7.23	January 1, 2014	6.81 - 9.56

(a) The analysis is based on a hypothetical residential consumer that uses 750 kilowatt-hours (kWh) per month. The values indicate a range of lowest-to-highest costs among the states. Wholesale markets costs for 2023 are preliminary.

(b) The figures in this range are the load-weighted residential retail power supply rates as calculated by the ISO using rates approved by state regulators as of January 1, 2024 and 2023 load figures by utility, by state.

(c) The ranges for residential retail power supply rates include the states that have unbundled retail electricity markets. Vermont has not unbundled its retail electricity market; therefore, its rates are not included as part of this analysis.

- The rates presented represent average rates over all rate classes.
- Not all components apply to all rate classes.
- Supply costs are inclusive of certain State energy policies, such as the Renewable Portfolio Standard and the Regional Greenhouse Gas Initiative.
- Regional Greenhouse Gas Initiative costs reflect only the small class loads served by standard offer service.

Central Maine Power Company's Average Rates by Component

2023 Calendar Year

Cost Component	Total Cost	Cents per kWh	Percent of Total
Supply	$828,683,163	16.81	52%
Distribution	$342,293,295	3.95	21%
Transmission	$309,691,724	3.58	19%
Renewable Resource Portfolio	$36,131,746	0.42	2%
Efficiency Maine Trust	$31,246,376	0.36	2%
Regional Greenhouse Gas Initiative	$22,202,971	0.54	1%
Utility Energy Supply Contract Obligations	$13,813,180	0.16	1%
Low Income Program	$11,148,191	0.13	1%
MPUC Assessment	$5,674,974	0.07	0.4%
OPA Assessment	$1,566,704	0.02	0.1%
Total	$1,602,452,323	26.03	100%

Table 1 -
2023 NEB Program Summary Cost and Benefit in Millions of Dollars

Benefit / Cost Category	Costs	Benefits
Program Expense	$130.76	N/A
kWh Credit Impact on Supply Cost	$4.43	N/A
Renewable Portfolio Standard (RPS) Cost Reductions	N/A	$31.89
Energy Resale Revenue	N/A	$15.44
Energy Price Suppression	N/A	$25.43
Capacity Benefits	N/A	$1.30
Transmission & Distribution system (T&D) Benefits	N/A	$45.73
Reliability Benefits	N/A	$1.17
Greenhouse gas (GHG) and Environmental Benefits	N/A	$42.57
Totals	$135.19	$163.54

SEA calculates that the NEB 2023 calendar year program expenses were $135.19 million and the program benefits were $163.54 million. Note that the cost and expenses are for all NEB projects operating in 2023. Thus, the impact of projects as old as 1994 are included in the analysis.

2 Introduction

In the 2023 Legislative session, LD 1986 "An Act Relating to Net Energy Billing and Distributed Solar and Energy Storage Systems" was enacted (the Act)[3] The Maine Public Utilities Commission (Commission) is tasked per LD 1986 with providing

ISO-NE Market Value of Solar

ISO-NE, the keeper of a competitive electricity market, rightfully decided "front of the meter" solar should enter the day ahead market with bids for their output, just like all other resources.

So, what is the real, market value of solar ?

First, consider it only brings generation to market during off peak hours, nevertheless, natural gas-fired generation generally sets the wholesale price during off peak and on peak hours.

In order to be a price setter, solar would have to bid lower than natural gas and displace natural gas at dispatchable level of generation.

Solar found out that they are not dispatchable. ISO-NE does not call on solar to get over the top.

Solar also found out their real market value would not even give them enough revenue to provide the capital costs to enter the market.

In the words of ISO-NE :

" Value of solar subject to the competitive ISO-NE wholesale market: While solar resources increased day-ahead offer quantities following DNE implementation, cleared day-ahead quantities have increased at a slower rate. Between December 2023 and February 2024, day-ahead cleared quantities were similar in magnitude to those of the prior winter, and most capability was offered at a price greater than $30/MWh and did not clear. "

$30/MWH. How did ISO-NE figure solar could even make it into the market?

This graph on the following page explains it all:
Note: CONE is "COST OF NEW ENTRY"
The vertical scale is $/kw-mo. and moves up and down with market conditions.
In 2022, when politics sent natural gas costs to soar, solar barely achieve CONE from market revenue.
In 2023, with politics somewhat removed from the market, solar does not achieve CONE without renewable energy credits.

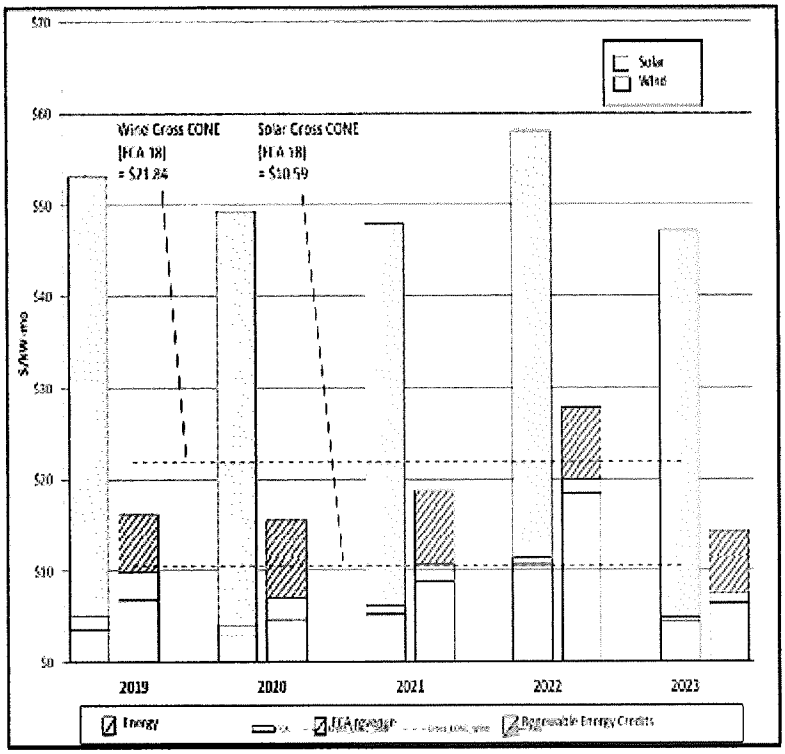
Renewable Energy Credits should be limited by seasonable capacity factors.

Wind at 33% CF would not achieve CONE in 2023.
Solar at 15% CF would barely achieve CONE in 2023. Winter solar, at a lower capacity factor, would not achieve CONE.
The market has surpassed prices of $100/MW for 35 days out of the last 38 days due to the cold weather. All generators have received these prices. Natural Gas achieves this price because it is

dispatchable, and this price would be considerably lower with adequate pipeline capacity and without RGGI costs, while solar value would always be $30/MW maximum.

When you hear about solar suppressing costs in the wholesale market, it is a lie. The market presents solar with unearned revenue.

Figure 1-17: Estimated Net Revenue for Solar- and Wind-Powered Units



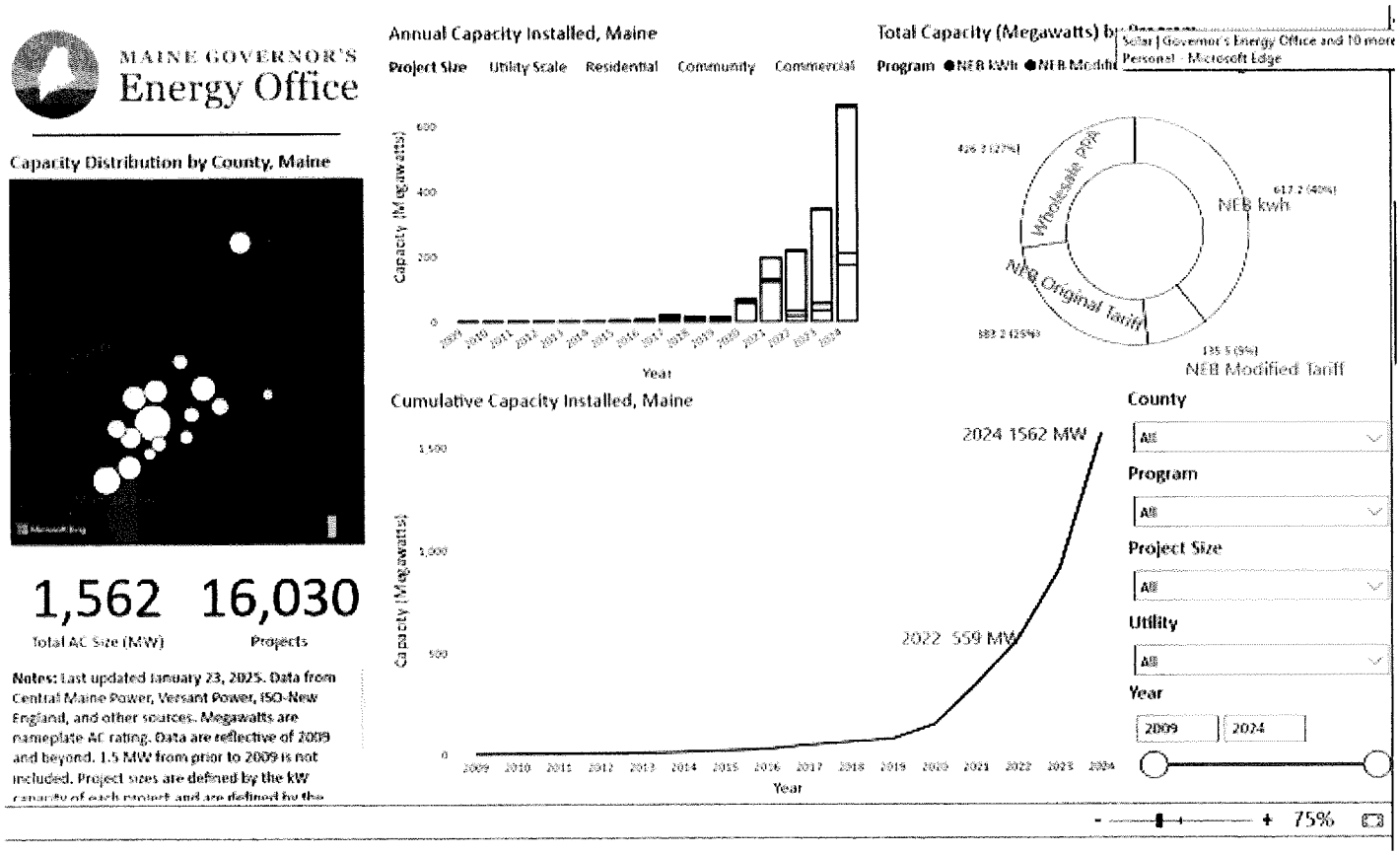
The profitability of wind and solar units in the region is intricately linked with state policies, with both resource types generally relying on additional revenue streams to those in the wholesale markets to be economically viable. Between 2021 and 2023, the solar unit would have earned 80% to 90% of its revenues from the sale of renewable energy credits; similarly, 30% to 50% of the wind unit's revenue would have been attributable to RECs. While these policies help to meet the region's clean energy targets, their economic impact on market prices and their operational strategies require careful consideration to maintain market efficiency and reliability.(For example, energy market prices may be distorted, with negative clearing prices prevailing whenever solar or wind units benefiting from these policies are marginal). 2023 Annual Markets Report PG 51-52 ISO New England Inc.

The rocket growth of solar sited in Maine means a charge of an additional $100 per participating account would mean an additional $0 charge on non-participating accounts.

14% participate

86% non-participate

You want to use up space on the grid, pay for it!



Report on the Effectiveness of Net Energy Billing in Achieving State Policy Goals and Providing Benefits to Ratepayers

Maine PUC Presented to the Joint Standing Committee on Energy, Utilities and Technology November 9, 2020

"In this Report, the Commission concludes that energy goals of increasing resource diversity through renewable resource generation, the promotion of solar generation and addressing climate change are promoted to a significant degree by the NEB program. The Commission also concludes that the current NEB program will result in substantial increases in electric rates. Such rate increase would have a negative impact on the State policies of promoting beneficial electrification and reducing oil dependence. "

A. Ratepayer Impacts Maine's ratepayers that participate in the State's NEB programs do realize benefits through reductions in their utility bills. The Commission notes, however, that, based on the structure of arrangements observed to-date in marketing materials for NEB facilities, it appears that NEB customers will receive a small portion of the value associated with their share of the facility (e.g.,10%-15%), while project developers or sponsors who will finance and construct the facilities receive the remaining value (e.g., 85%-90%). Moreover, individual ratepayer savings resulting from participation in the NEB program will be offset to a substantial degree by rate increases resulting from lost utility revenues that are ultimately paid for by the general body of ratepayers.

Finally, as noted above, the capacity of NEB facilities pending in the service territories of CMP and Versant is already significant and appears to be on an upward trajectory. For CMP, the capacity of these facilities was in excess of 50% its peak load as of the end of September. This suggests that there could be NEB facility capacity in excess of system load at certain times. The consequences of this have not yet been examined and appears worthy of further study. Based on information presented to the Small Generator Interconnection Stakeholder group, it appears that the utilities may have this same or related concerns and have indicated the potential that additional equipment and associated costs may be needed to address reliability and operational issues. The potential magnitude of these costs is not readily quantifiable.

Bills before the EUT Committee would repeal Net Energy Billing, LD 32 and LD 257.

A Public Hearing is scheduled for February 27,2025.

Written testimony received so far includes 91 opposed to the repeal and 16 in favor of the repeal.

Not surprising, most of the 91 opposing the bill participate in the "screw your neighbor" NEB program. Many do not even have solar panels at their residence because they are subscribed to projects developed by business firms, many who have out-of-state headquarters. Many probably do not even know where their savings originate. And some take the righteous approach thinking that climate change is real, and some have swallowed a report commissioned by the PUC that includes sketchy math that concludes NEB is a big benefit for all.

There is no doubt that NEB has strained many Maine household budgets. Low Income Assistance Programs administered by the utilities are seeing an influx of funds, again from other ratepayers.

IMO, these funds are payoffs to keep cost complaints down. Someone once said "You can fool some of the people, all of the time, and you can fool all of the people, some of the time, but you cannot fool all the people, all of the time"

A Cheap Shot at Carbon Dioxide

"The average residential CMP Delivery amount includes about $15 per month in non-CMP costs to support Maine public policy initiatives including net energy billing subsidies, low-income assistance and energy efficiency."

That message came with my electric bill. How much is too much to reduce greenhouse gases from the atmosphere? As I listen to people telling of the dangers of carbon dioxide, and how this substance must be eradicated from electricity production, transportation, agriculture and home heating, I conjure up a scene of a recession of civilization culminating in the return of cave dwelling.

Can we agree on some facts?

1. Carbon dioxide is a natural occurring gas.
2. Carbon dioxide is integral to vegetation growth.
3. Volcanoes and wildfires produce amounts of carbon dioxide that exponentially surpasses all fossil fuel chemical reactions.
4. Volcanoes and wildfires are naturally occurring events.
5. Climate is defined by trends in temperature.
6. The climate changes in a somewhat cyclic way, sometimes warming, sometimes cooling
7. The planet could very well be experiencing a warming period, or a warming period within a cooling period.
8. Depending how the length of time a warming/cooling period is defined, an abrupt length of time within a defined period could be contrary to the period's assigned designation.
9. These periods are beyond human control.
10. These periods develop due to many variables.
11. Humans have yet to discover all variables pertaining to climate or how each variable interacts with each other.
12. The present concentration of carbon dioxide in the atmosphere is accepted as approximately 450 parts per million.
13. The optimum concentration of carbon dioxide in the atmosphere for vegetation growth is around 1000 ppm.
14. Most terrestrial life would cease at carbon dioxide levels below 150 ppm.
15. Could be that carbon dioxide concentrations increase with warming cycles.
16. Could be that carbon dioxide concentrations decrease with cooling cycles.
17. We know not enough to claim continued use of fossil fuels to enhance the living experience will kill us all.
18. Trying to control the climate through public policy that will cost trillions and reduce human living conditions needs to be carefully examined.

on supply-demand shifts, material policy changes, and a range of other factors. Current prices are in the high $30s per MWh.

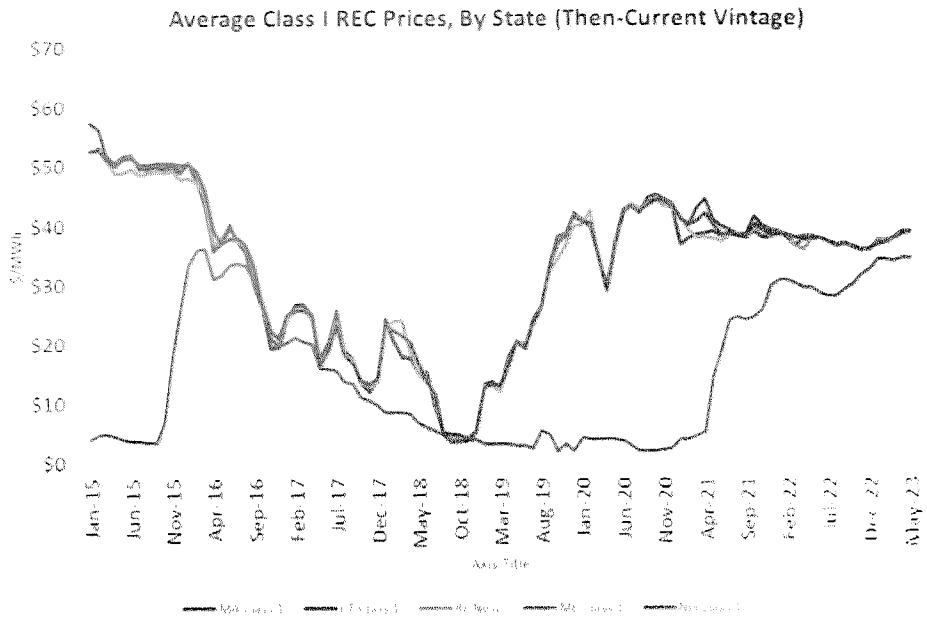


Figure 1: New England Class I REC price Historic Range and Volatility