Testimony before EUT committee regarding NEB Thursday, April 10, 2025 In opposition to LD 1321.

Good afternoon, my name is Michael Dunn and I live in Harrison.

My wife and I have been net energy billing CMP customers for about 12 years. I'll focus most of my comments on the residential, behind the meter aspects of LD 1321.

NEB programs across New England get credit for lowering the cost of electricity. The obvious example for this is the elimination of the subsidy ratepayers paid for several years to keep the Mystic River Generating Station open. But it also shows up because the Levelized Cost of Energy for solar is about the same or less than fossil fuel electricity.

The NEB program is credited with reducing greenhouse gas emissions. This might be hard to see, even in aggregate, but there is one outstanding example which makes it clear. Our grid operator, ISO-NE, stated that it would be safe to shut down the gas fired Mystic River Generating Stations in Boston because of behind-the-meter solar. Mystic River was shut down last May.

Grid peaks are an expensive period for utilities. Residential time-of-use and commercial rates charge a premium to deliver power during peak times. Even non-TOU accounts in the MGS, IGS and LGS rate structures get a demand charge. Solar works very nicely to shave those peaks, which puts downward pressure on the need for demand charges and grid expansion. LD 1321 pushes in just the opposite direction, in effect telling homeowners and businesses, "No, we don't want your investments to make the grid better. We'd rather ratepayers pay more for these services."

Solar NEB customers are doing precisely what many utility rate structures are pushing us to do, that is, to stay off the grid during peak times. Even on quite cloudy days, our panels produce enough power to remove our house from the grid. And on bright days, the ISO-NE real-time charts show that behind the meter solar is providing over 6GW of power. That's 6 nuclear power plants. This distributed power is what allows utilities to delay or eliminate costly grid expansions, costs that are borne by ratepayers.

<omit during speaking time>Battery storage can be configured to reduce grid evening peaks. Indeed, I've done just that with my solar and batteries to essentially eliminate my home's consumption from 7AM through 8PM weekdays year around. Utilities offer rate structures to incentivize this (Residential A-TOU and B-CPT, among others).

NEB promotes homeowner and corporate investment, not utility or State investment, to address several energy challenges including grid resiliency, cost and pollution. While LD 1321 retains the benefits to the utilities and all people who breathe, it reduces and then eliminates the benefits to investors who make this possible.

Net energy billing is not perfect, but eliminating it is not the solution.

Thank you.

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