

Sundog Solar LLC  
P.O. Box 465  
222 East Main St.  
Searsport, ME 04974

May 13, 2025

Senator Mark Lawrence, Senate Chair  
Representative Melanie Sachs, House Chair  
Committee Members on Energy, Utilities and Technology  
2 State House Station  
Augusta, ME 04333

*LD 1936, "An Act to Provide Greater Equity in and Reduce Cost Related to the State's Net Energy Billing Program"*

Dear Senator Lawrence, Representative Sachs, honorable and distinguished Members of the EUT committee,

This statement provides written comments from Sundog Solar LLC in opposition to LD 1936 as it is written today.

Sundog Solar and our dedicated company of 30+ employees, has been operating out of Searsport Maine since 2009. Sundog's company vision is to "*Energize a Brighter Future*" which we deliver through our mission of "*Megawatts of Happy Customers*". We offer installation and maintenance services for photovoltaic, energy storage, heat pump and Electric Vehicle charging technologies. Our company develops turnkey installations for both residential and commercial customers. Sundog has been interconnecting level 1 and 2 renewable distributed energy resources (DERs) for over 15 years.

LD 1936 is written in a well intended manner to address some of the concerns that the rate base has expressed in regards to Net Energy Billing (NEB). The bill aims to end the NEB program as it is by October 1, 2025 while allowing a more narrow standard of participation moving forward. Interconnecting projects would need to be consumer owned and under 1MW or customer owned onsite projects serving the customers load, with 100% of the credits going towards offsetting their retail account.

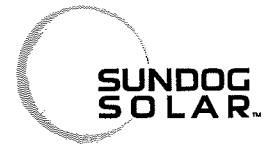
While both of these narrowed pathways service more than 90% of Sundog's customer base, it does exclude some very important development pathways. The most notable is in the situation of third party ownership and direct power purchase agreements. Sundog owns and operates multiple photovoltaic systems that are structured in this manner serving non-profit, municipal and government related entities



operating within our communities. Without the IRS direct pay opportunities, the third party ownership model is an important development pathway for these entities for whom self-funding is not feasible. Sundog proposes a potential solution to this important development pathway, which comes with compromise. It is suggested that the bill language be modified to allow for **“third party owned, single consumer credited projects”**. This would allow for that exact scenario to exist where a third party entity can own the project, while directly offsetting a single consumer's account, or accounts, with the credits. This narrows the development opportunities to be bound by single consumers, regardless of whether owned by the consumer or a third party entity.

The proposed Bill Tariff credit rate projects drops to well below 50% of the current Tariff credit rates. This is too much of a dramatic devaluation of the renewable kWh's being supplied by these systems to our local electricity mix. In solving the financial inefficiency of the Tariff rate program to the rate base, cutting compensation by 55-60% is a dramatic pendulum swing which will likely prevent consumers from investing in projects under the tariff rate program. This will essentially affect the majority of small and medium sized businesses in that the ROI's for their photovoltaic investments would negate the majority of the projects occurring. We support a compromise to the tariff rate, but more in tune of a 20-25% reduction with the assurance of an escalator. It seems that the Tariff Rate program has cost only a few percent compared to the benefits it provides to the general rate base. Altering the compensation of the Tariff Rate at a lower capital percentage is more aligned with the currently known cost/benefit ratio described in the Sustainable Energy Advantage report provided to the MPUC in April of 2024.

The bill proposes to end NEB for participating consumers once their “agreement” with the electric utility ends. The often 20 year agreement with the electric utility doesn't cover the entire operating lifespan of a photovoltaic system. This is specifically important for residential, consumer-owned small projects and single customer-owned on-site projects. These photovoltaic system investments are often made by the individual that is looking for the longest possible return on their investment. Currently residential and small commercial solar panel manufacturer warranties are offering the market 30 years. This ensures that the consumer will benefit at an average of 80% of the name plate rating of the solar panel, in 30 years. The photovoltaic systems will continue to operate well past the electric utility agreement timeframe. Sundog believes that it is very important to include language in the bill that provides a pathway of future operation and compensation potential for the consumer. The renewable kWh's will still



be valuable at the end of the electric utility agreement window and the interconnecting rate payer will still need to be compensated for that value contribution.

On behalf of Sundog Solar and our employees, more importantly our customers as well as other interconnection rate payers, we strongly urge this committee to reject LD 1936 as written without altering the bill to account for some of the important points made above. Thank you kindly for your attention and ongoing commitment and dedication to positively revising the NEB program for the greater benefit of all rate payers.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. Piper".

Danny Piper  
Principal Owner  
Sundog Solar LLC