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Testimony of Representative Gerry Runte introducing

LD 2113, An Act to Align Long-range Grid Strategy with the State Energy Plan and Strengthen Integrated Grid Planning

Before the Joint Standing Committee on Energy, Utilities and Technology

Senator Lawrence, Representative Sachs, and distinguished members of the Energy, Utilities and Technology Committee, I am Gerry Runte and I represent Ogunquit, Wells, and York. Thank you for the opportunity to present testimony on **LD 2113, An Act to Align Long-range Grid Strategy with the State Energy Plan and Strengthen Integrated Grid Planning.**

Integrated grid planning is one of the state's most important tools for achieving affordable, reliable, resilient, and climate-aligned electricity service. LD 2113 addresses a structural gap in how Maine plans, regulates, and invests in its electric grid. While Maine has made progress in grid planning and energy policy, ongoing proceedings examining the Non-Wires Alternative (NWA) process and the reexamination of future long-range grid plan priorities are still not well aligned in timing, scope, or accountability. This bill is intended to fix that.

The overarching problem was clearly illustrated by the relationship between Central Maine Power's (CMP) most recent rate case, filed last September, and its required ten-year integrated grid plan (IGP) filed in December. The IGP should have preceded the rate filing so it could inform investment decisions, but there was no statutory requirement for it to do so. And in fact, during deliberations that ultimately led to dismissal of the case, Commissioner Scully observed:

> "I don't think we have the authority to dismiss the rate case simply because CMP filed this rate case in advance of their filing of the required grid plan… The legislature could have imposed such a restriction had it intended this result."

That statement highlights the problem this bill is intended to fix. What is the value of the IGP, a long-term plan, if later rate cases are inconsistent with its elements? And should that plan be left solely to the utility, merely treated as advisory, rather than formally adopted and enforced?

LD 2113 answers those questions by establishing a Commission-adopted, ten-year IGP developed by the Department of Energy Resources (DOER), rather than by the utilities, as is the case now. The plan would be developed with strong utility involvement and include stakeholder input as well as consultation with the PUC and other agencies. Future utility filings would then need to demonstrate consistency with that plan. Adoption by the Commission would not be pre-authorization of projects or spending. Rather, the IGP provides strategic direction grounded in data, expert input, and public engagement, and ensures that future rate cases, and capital investment plans can be evaluated against a common, statewide framework.

Integrated Grid Plan Ownership

Who develops the IGP matters. When planning is utility-led, the focus naturally reflects the utility's core responsibilities: system reliability, capital deployment, and financial recovery. Those are legitimate considerations, but they are not the only ones the state must weigh. By assigning IGP development to the DOER, LD 2113 ensures that affordability, demand-side solutions, climate risk, and alternatives that reduce or defer capital investment are considered on equal footing. Utilities remain essential contributors, but the plan itself reflects a broader public-interest lens.

Just as important, the plan must reflect a systems-thinking approach to grid planning, recognizing that infrastructure, customer behavior, electrification, distributed resources, climate risk, and technology adoption interact over time. Optimizing individual projects or individual proceedings in isolation is not enough.

LD 2113 as the yardstick for a 10-year IGP

LD 2113 makes clear that a long-range plan must be more than a forecast or a list of projects. It must be scenario-based and forward-looking; explicitly evaluate non-wires alternatives, grid-enhancing technologies, distributed energy resources, and flexible demand as system resources; prioritize capital-efficient strategies that maximize existing assets before new infrastructure; and include measurable objectives that support accountability and performance-based regulation.

What happens without a consistency requirement

So let us do a brief thought experiment. Assume that a rule already existed requiring rate cases to be consistent with an adopted IGP. We can then compare CMP's September rate case filing with its December IGP to see whether the filing would meet that standard. The following table summarizes the results.

Dimension	IGP Expectation	Rate Case Alignment	Assessment
Planning Role	System needs identified first; investments and alternatives evaluated before capital needs developed.	Predefined capital program proposed first; no system needs defined first to develop proposed investments.	**Not aligned**
Load Forecasting	Scenario-based, flexible demand and distributed energy resources (DER) adoption scenarios.	Single-path base forecast and treated as fixed input.	**Partially aligned**
Non-Wires Alternatives	Should be first-order, core planning activity with quantified deferral values.	Presents narrative, isolated project discussions; no evidence of a systematic screening process across the proposed capital portfolio, nor quantified estimates of deferrable capacity, avoided cost, or reliability equivalence. Treats as afterthought.	**Not aligned - conceptually recognized but not fully integrated**
Asset Utilization	Prioritizes maximizing utilization of existing infrastructure before authorizing expansion.	New investments justified by projected peak conditions and asset condition thresholds, with limited analysis of operational changes, reconfiguration, or technology-enabled optimization that could increase utilization of existing assets.	**Not aligned - limited incorporation of increased utilization**
Grid-Enhancing Tech (GET)	Requires explicit evaluation and deployment pathways.	Acknowledges GETs but are not treated as substitutes for traditional investments. No binding deployments, cost benefit analyses or quantification of GETs deferring capital projects.	**Not aligned- limited incorporation of utilization-first logic**
DERs & Flexibility	Treated as actively managed system resources.	DERs, EVs, and electrification framed as drivers of system stress. No modeling of DERs, storage, or flexible loads as resources or reducing infrastructure needs at specific locations.	**Not aligned- Not yet treated as system resources**
Cost Mitigation	IGP explicitly links planning decisions to affordability outcomes and requires consideration of least-cost system solutions.	Customer rate impacts are presented as an inevitable outcome of required investments rather than as a variable influenced by planning choices.	**Not aligned**
Coordination & Sequencing	Long range planning should inform rate filings.	Rate case filed before IGP completion and could not incorporate its findings. Filing pre-commits the system to investments that the IGP was intended to evaluate.	**Procedurally misaligned**
Transparency	Assumptions, tradeoffs should be explicit in a form accessible by regulators and stakeholders before investment decisions are finalized.	Filing is dense, project-specific, and adversarial in structure, difficult for stakeholders to assess tradeoffs or system-level logic. Key assumptions and decision rules are embedded rather than explicit.	**Partially aligned**

If the rate case as filed had been required to be consistent with the IGP, it would have fell short in several key areas. And there is another question: how does the CMP IGP compare with what LD 2113 envisions?

The CMP IGP and LD 2113

The CMP IGP demonstrates meaningful progress in several areas. It aligns with LD 2113 by identifying system needs before proposing solutions, considering multiple load and electrification scenarios, and acknowledging the role of non-wires alternatives, grid-enhancing technologies, and flexible demand. It also provides a roadmap for foundational investments, including data integration, advanced forecasting, automation, and advanced management systems, which are essential for effective resource use.

However, the IGP lacks enforceable measures. It does not establish a binding decision hierarchy that prioritizes capital-efficient or non-wires solutions before approving traditional infrastructure. It also does not define standardized screening criteria, benefit-cost methods, or procurement pathways for non-wires alternatives. While it mentions a shift toward time-series planning, it does not set clear milestones, decision rules, or performance metrics for rate cases.

Even in those areas where the IGP aligns with LD 2113's intent, the recent rate case consistency check shows that intent alone is insufficient. Without an adopted plan that translates these concepts into explicit standards, rate cases may proceed without meaningful connection to planning.

What Versant's IGP shows

Versant Power's Integrated Grid Plan is different. Versant's IGP treats the grid plan as a forward-looking system planning framework, rather than a proxy for capital authorization or cost recovery. It models electrification and distributed energy growth at the circuit and substation levels, across various seasonal and time-of-day conditions, and evaluates both traditional and non-traditional solutions to meet system needs.

Importantly, Versant's IGP defines a ten-year grid-needs envelope and identifies a set of "no regrets" solutions. This provides the analytical baseline needed for applying a consistency requirement in future rate cases.

This comparison is not about favoring one utility over another, but it demonstrates that the technical tools for developing an IGP as envisioned by LD2113, are already available.

Without this structure, Maine risks having two separate long-range visions for a single interconnected grid: one from CMP and another from Versant. Neither would be binding on the other, nor would they necessarily reflect a unified state strategy,

What must a 10-year plan include for consistency to be real?

For LD 2113's consistency requirement to be effective, the PUC adopted IGP must go beyond high-level goals and use system level planning. At a minimum, it should:

- **Use what we already have first.** Before utilities are allowed to build new poles, wires, or substations, the plan should require them to show they've first tried cheaper options—like fixing bottlenecks, using smarter controls, upgrading software, adding storage, or using customer-side solutions that reduce demand at peak times.
- **Provide a clear, statewide way to use cheaper alternatives.** There should be one set of rules for the whole state that explains how utilities must look for and evaluate non-wires options like energy efficiency, demand response, batteries, or local solar instead of automatically building new infrastructure.
- **Give explicit requirements for time-series and scenario-based planning.**
- **Offer a way to check whether utility spending matches the plan.** When a utility asks for rate increases or construction projects, it should have to show exactly how those proposals fit the long-term plan, and what other options were considered.
- **Include clear ways to track results.**

Without these elements, any IGP might just provide information instead of guiding real action.

Conclusion

LD 2113 is intentionally technology-neutral and builds on existing statutory tools. It does not change who builds the grid, but rather how Maine determines what should be built, when, and why. By aligning rate cases and capital investment decisions with the IGP, the bill seeks to optimize use of the existing grid, increase reliance on modern technologies and smarter planning, and avoid unnecessary spending, all while maintaining reliability and resilience.

I hope there is consensus on these challenges within our current system. The bill is intended to highlight these issues and provide a solution.

I look forward to the Committee's questions and the testimony of others.