Central Maine Power

An Avangrid company

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

Senator Lawrence, Representative Sachs, Members of the Joint Standing Committee on Energy, Utilities, and Technology, my name is Craig Nale, Senior Director of Regulatory Affairs for Central Maine Power Company, presenting testimony in opposition to LD 2113: An Act to Align Long-range Grid Strategy with the State Energy Plan and Strengthen Integrated Grid Planning.

Over the past four years, the Legislature has created a comprehensive, stakeholder-driven integrated grid planning framework. LD 1959, which the Legislature enacted in 2022, requires ten-year grid plans that include detailed analysis of load growth, distributed energy resources, hosting capacity, environmental justice, and non-wires alternatives. LD 1726, which was enacted last year, then strengthened this framework by adding consistent forecasting across state planning efforts, and requiring for the next grid plans explicit consideration of advanced conductors, grid-enhancing technologies, and low-voltage sensors for grid visibility. The first round of integrated grid plans, which were finalized and filed between December 15, 2025 and January 12, 2026, are still being reviewed. Those plans are the result of an extensive process: the Commission led more than eighteen months of workshops and stakeholder sessions to build the structure and priorities for these plans, which was followed by an additional eighteen months of modeling, needs identification, and solution development by the utilities, all with ongoing stakeholder engagement. This is a robust, transparent, and iterative process taking place under the Commission's independent, adjudicatory oversight, and it is still ongoing.

LD 2113 would set up a parallel planning regime at the Department of Energy Resources. Under the bill, DOER would create its own ten-year long-range grid plan, the PUC would then be required to adopt that plan by order, and every utility rate case, capital plan, and integrated grid plan would have to demonstrate consistency with DOER's plan. This approach blurs the essential line between policy development and independent regulation and invites conflict between the DOER plan and the Commission's prudence determinations. In practice, it risks functioning as a form of de facto preapproval for favored investments outside of the protections provided by a fact-specific adjudicatory record. And because DOER would be producing its own grid plan without the operational knowledge, historical system understanding, or engineering staff that a utility possesses, it is inevitable that the DOER plan would conflict with the utility's integrated grid plan. A state

agency without system planners or operational responsibilities simply cannot produce a plan that matches the depth, technical accuracy, and safety considerations of a utility-led grid plan.

LD 2113 also places utilities in the untenable position of having to propose and defend investment proposals in support of a system plan they did not create. A utility bears the burden of proof in a rate case to demonstrate that its investments are prudent, cost-effective, and necessary to provide safe and reliable service. LD 2113 requires utilities to prove that their rate case positions are consistent with a DOER grid plan they did not write, may not agree with, may be technically unable to implement, and likely does not adequately incorporate system safety, reliability, maintenance, or storm-response needs. In that situation, the utility is no longer advocating for its own engineering judgment. It is forced to defend a plan built outside the utility, even if its system planners believe that the DOER plan would reduce reliability, divert capital from higher-value system needs, raise customer costs, or conflict with NERC, NPCC, or ISO-NE standards. Requiring a regulated entity to defend a plan it had no role in developing is unworkable and fundamentally unfair, and it undermines the integrity of the rate-setting process.

The bill would also add unnecessary costs for ratepayers. DOER would need consultants, expert panels, and staff to replicate a complex planning process that the Commission has already completed for the current set of grid plans. Trying to mirror the utility's operational expertise, including knowledge of storm response, regional coordination, asset condition, safety standards, and system modeling, would be extraordinarily expensive and still incomplete. Ratepayers already fund consultants for the Commission and for the Office of the Public Advocate, both of which participate extensively in grid planning and rate cases to vet whether investments are prudent before they are approved. Creating a duplicative process at DOER offers no clear benefit commensurate with its cost.

Finally, the State Energy Plan is a policy document that reflects evolving political priorities, preferred strategies, decarbonization goals, and market-development initiatives. Technical grid planning, however, must be apolitical, objective, and grounded in engineering. It must be durable across administrations, based on industry standards, and built around actual system data and physical constraints. A grid plan must test multiple scenarios rather than adopt a single policy-driven future. Doing otherwise undermines the stable planning environment that the electric system requires.

For these reasons, we respectfully urge the Committee not to advance this legislation.

Thank you for your time and consideration.