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February 10, 2021

Joint Committee on Energy, Utilities and Technology Cross Building, Room 211 Augusta, ME 04333 EUT@legislature.maine.gov

> Public Testimony of Brookfield Renewable on LD 9 – An Act to Promote Renewable Energy by Authorizing a Power-to-Fuel Pilot Project

Chair Lawrence, Chair Berry and members of the Joint Committee on Energy, Utilities and Technology:

Brookfield Renewable greatly appreciates the opportunity to provide testimony on LD 9, which directs the Public Utilities Commission to administer a pilot program to support the development of up to 20 megawatts (MW) of projects converting renewable energy to hydrogen gas, methane gas or another fuel. Brookfield Renewable is neither for nor against this legislation but is providing these comments to assist the Joint Committee in its work on this issue and issues related to optimizing renewable energy production.

Throughout Maine Brookfield Renewable owns and operates 46 hydropower stations totaling 622MW of installed capacity, 219MW of windpower and a 20MW battery located in Millinocket. Brookfield Renewable has over 100 employees in Maine and supports 275 indirect jobs across the State. Each year, Brookfield Renewable invests millions of dollars in capital projects in Maine, with plans to invest more than \$300 million over the next 20 years to maintain and optimize our existing Maine fleet. Brookfield Renewable pays more than \$20 million in property taxes in Maine annually, which provides critical funds for local schools, fire departments and public services.

Brookfield

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Brookfield Renewable urges the Joint Committee to first consider the necessity of the proposed pilot. In general, the requirement to approve *two* power-to-fuel projects of up to 10MW each by December 31, 2027 assumes another approach to addressing transmission constraints and associated renewable energy curtailment is not already available or that market and system conditions won't change before 2027. For example, battery storage paired with existing and new renewable energy projects can optimize renewable energy that would otherwise be curtailed by shifting delivery of renewable energy to less congested time periods. Investments have already been made in Maine, and additional opportunities are being explored, to enhance renewable energy production and system reliability for the benefit of ratepayers and carbon reduction goals. Importantly, this optimization is occurring without added carbon emissions, which may not be the same for the proposed power-to-fuel pilot.

As the Joint Committee reviews whether to advance a power-to-fuel pilot program, it would be sensible to consider whether the 10MW project limit is appropriate or should be reduced. Any pilot structure should also, at minimum, include defined metrics that assist the Public Utilities Commission in determining the viability of the program and to guide project selection. Adding parameters would ensure a more open and competitive program without predetermined projects or locations.

The Joint Committee should also consider that providing an exemption from distribution charges to a specific technology would be choosing technological winners and losers. As described, battery storage projects have been built and proposed that have not had access to this same incentive, and many projects will not be economic without similar treatment. In the context of the Joint Committee's broader work this session – especially as it relates to energy storage – the Joint Committee should consider whether similar treatment for other technologies and use cases is necessary.

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Thank you for your consideration of our comments. Please don't hesitate to contact me directly to discuss any of these issues and concepts further.

Sincerely,

Steve Zuretti

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