

Monday, January 15, 2024

Kat Taylor – Testimony on LD 1963 -*An Act Regarding the Future of Renewable Energy Transmission in Northern Maine*

**The following is my testimony on LD 1963.**

Please let me start first by saying for the record that I have the utmost respect for Senate President Troy Jackson. He and I share a heritage of being from generational Mainers who made their living from the natural resources of Maine.

Senator Jackson is to be commended for his efforts in bringing prosperity to Aroostook County. He was gracious enough to reach out to me after I sent an email voicing my concerns about the Aroostook Renewable Gateway (LD924) to him and my local representatives Gary Drinkwater and Mike Tipping.

We had a lively discussion and I mentioned that the use of eminent domain was discussed at the Howland stakeholders' meeting. Later I sent him an email from Senior VP Lawrence Willick confirming this. Senator Jackson was quoted in local newspapers as being against the use of eminent domain shortly after. He has been responsive to the wishes and concerns of Maine voters and I appreciated his forthright answers at the public hearing when put to the question by the Energy, Utilities and Technology Committee (EUT).

I took the position of “Neither for nor Against” because even though **I am against** the Aroostook Renewable Gateway (**ARG**) and the King Pine Wind Farm (**KPWF**), **I am for progressive development of renewable energy resources that benefit rural Maine.**

**If LD 1963 cannot be amended to achieve that goal, and the EUT’s decision is solely to decide on whether or not to put out another Request For Proposals for an energy corridor, then I am opposed and suggest the EUT committee vote ONTP. Careful consideration must also be given to the KPWF project and whether or not it is the best solution for harvesting Aroostook’s abundant resources.**

**Creating a single high capacity transmission line will be unpopular, take years to realize, may ultimately fail, and is not the path forward;** it is a step backwards to the days when transmission lines were put up all over Maine to transfer electricity. **Today’s technology in smart grid development may make the days of connecting to static energy generation sources over a single line a thing of the past.**

Think point A to point B. We used to use cables to connect to the internet, one computer to one modem. Smart grid systems would allow multiple connections with load balancing (<https://www.iea.org/energy-system/electricity/smart-grids> ). Think wifi internet. Today multiple internet connections can be achieved over airwaves to a single router. The only limitation is the bandwidth, or throughput capacity, of the wifi router.

Our aging energy infrastructure has reached the point where **it does not matter how much energy we generate since we have to filter it through the bottleneck of incumbent utilities to return it to rural Mainers through an unreliable, unbalanced**

**system.** The sales pitch of “Maine grown energy for Mainers” is misleading since supplying rural Maine with reliable, affordable energy is overlooked.

**Connecting Maine to the ISO-NE is the major focus of LD 1963.** Instead Maine needs to ‘future-proof’ our energy infrastructure instead of using old technology on a larger scale.

Because of this goal, and speaking as a former Information Technology professional, I **cannot support a system that will only seek to further the status quo of old, cumbersome technology and failure to invest in a system that will propagate reliable, affordable energy to rural Maine in an equitable manner.** I cannot support a system designed to further **enrich the already wealthy** while ignoring **Maine’s need for locally built, owned and operated energy generation and distribution** that will bring prosperity to rural Maine.

Below are my **comments on Senator Jackson’s amendment.** I’ve also attached an **email thread between myself and LS Power Senior Vice President Lawrence Willick,** who I met at the Howland Stakeholders’ meeting. In it I ask VP Willick many of the **questions posed at the recent hearing and it contains unedited answers directly from a high level representative of LS Power.**

I’ve also included a **comprehensive news article** (See “**Foreign Investors Will Reap 92 Percent of Profits...**” news article below) on the ARG and KPWF projects **breaking down the investment structure** and technical details which may give the committee answers to questions they asked of industry professionals. This article is **a must read to understand the structure and culture of large energy projects.**

Thank you for your time and attention.

I will be happy to provide additional research to support my testimony or answer any questions the committee may ask of me.

Respectfully,

Kat Taylor  
Argyle Twp.

## Senator Jackson's Amendment

**Sec. 1. 35-A MRSA § 3210-I, sub-§1** is amended to read as follows:

**Program established** *"To promote development of the substantial renewable energy resources in northern Maine."*

*The Northern Maine Renewable Energy Development Program decision was made before the NECEC was allowed to continue and offshore wind farm projects were approved and may no longer be necessary for Maine to reach its climate goals in regards to the ISO New England grid.*

The question is, **who do the ARG and KPWF projects truly benefit?**

Even though **Maine ratepayers would pay for half of the ARG** we will not own or have any control over it. **92% of the KPWF** is owned by foreign interests. (See **"Foreign Investors Will Reap 92 Percent of Profits..."** news article below)

The **land the KPWF sits on is owned by JD Irving**, arguably the largest landowner in Maine; is that who will benefit from any tax revenue?

**A transmission line from Aroostook County will do nothing to add to the reliability of our energy supply.** Hundreds of thousands of Mainers lost power repeatedly this last year and are continuing to endure outages regardless of where their energy originates.

**Gas powered generators and vehicles had to be employed during outages for residents to survive.** An extension cord from Aroostook County to Massachusetts would have done us no good; however, **buried transmission lines** would have reduced the impact on so many residents.

We keep hearing the subterranean option is too expensive, yet **we will continue to endure outages until we** bite the bullet and **bury power lines**. Incumbent utilities keep lines above ground to reduce investment costs. Yet, that practice may also be ensuring job security in perpetual maintenance and repair, the cost of which they can pass on to ratepayers.

In spite of recent lower natural gas prices, Versant is yet again requesting another price hike. **Instead of investing in the reliability of our infrastructure, they are focusing on recouping the costs of power restoration exacerbated by neglect (and political advertising), passing those costs on to ratepayers.**

So debating how much energy will cost per kilowatt is unproductive since **incumbent utilities charge** whatever they want **to fill any revenue gap** and whatever the PUC will bear.

Public advocate Harwood pointed out the **need for long range planning**. But the planning has to be locally determined to be effective. The needs of coastal Maine are different than the needs of inland. The needs of rural Maine are different from

the needs of urban. **Only the people who live in an area can assess their need for power**, how much is used, how and where it is developed and how much it should cost.

**Therefore multiple projects with diverse methods must be considered.**

**More Public Input** - Given the controversial response to any energy corridor project, the public needs to be allowed to submit comments and testimony before paying for a project they don't want or may not need or be able to use. Since this new RFP may be over \$1billion, I believe the voters should be able to weigh in. It is not equitable to only apply Question 1 to member owned utilities, exempting for profit entities.

“Encourage the **rapid development** of renewable resources in northern Maine”

Because of opposition, the Aroostook Renewable Gateway (**ARG**) and King Pine Wind Farm (**KPWF**) **consecutive projects will take years longer than anticipated to permit and implement.**

**Localized, site specific, smaller projects** could be approved faster, regionally owned, operated and contracted to local labor.

“Transition the State's **mandated renewable energy purchasing** through contracting approved and ordered by the commission for the purchase of capacity, renewable energy and **renewable energy credits (REC)**”

**Local use, control and ownership** would allow Maine to reap the benefits of REC's allowing investment back into the local areas to **improve reliability** and **support future development.**

**Longroad Energy would own any REC's generated by KPWF** making that revenue unavailable to Maine.

“**Promote energy equity** with particular consideration given to the economic circumstances and opportunities in the State's **socially vulnerable counties and communities... disproportionately burdened by existing social inequities or lack the capacity to withstand new or worsening burdens;**”

**All of Rural Maine is a “socially vulnerable” community.** We bear the burdens of urban Maine's lifestyle and are the first to be targeted for large development.

**We are** the last to get power restored in outages and **the first choice in development of renewable energy infrastructure** no matter the environmental or socioeconomic costs to our land or lives. **This is hardly equitable.**

“Recognize that the **near-term development** of the transmission and other infrastructure necessary to reduce greenhouse gas emissions is in the public interest.”

**Opponents of the ARG are not against renewable energy development.**

They are against sacrificing land and the environment for what is in essence a project designed to benefit out of state/country interests rather than home grown energy from which Mainers can directly benefit.

**Projects that will take years to develop and will cost ratepayers for decades does not serve “near term development” or the public’s interest.**

“...**partner with other states or entities** in the procurement of infrastructure ... and renewable energy generation projects”

**Locally owned and operated smaller energy projects allows Mainers to develop at a sensible pace** rather than putting all our resources into one huge project that may rely on out of state collaboration and global energy price predictions to achieve its goals.

**Once we commit to a large development we will have no other options or resources to correct course or pursue smaller more sensible projects.**

“**Request for proposals; generation connection infrastructure.** The commission shall issue a request for proposals for the development and construction...”

“The proposals must be required to cover a **contract term** of 30 years, except that the commission may, in its discretion, approve a contract term of a different duration.”

**Caution is advised when entering into a long term contract with “other entities”.** Mainers need to know the feasibility and direct benefit, or detriment, to their local area before agreements are made. Without knowing what the impact will be on communities and environment, Mainers cannot make an informed decision.

**Public Transparency** is needed. Recent agreements have denied access to information regarding routes, cost or impacts on communities and have been based on studies speculating on natural gas prices which fluctuate.

“The commission shall **evaluate** the proposals received **based**, at a minimum, **on the following factors: cost, economic benefit to northern Maine...**”

**The ARG would have been paid for in part by ratepayers but would have been owned by LS Power.** If **ratepayers** are subsidizing a project they **should be at least part owners** and **reap the benefits in lower energy costs and any sale of REC’s.**

Mainers should also have influence in **bolstering current and future local infrastructure for accessibility and reliability.** We are expected to pay

incumbent utilities, which are unwilling to invest in improvements, for repairs from storm damage that may have been avoided in the first place.

“The commission shall **give preference** to proposals that..”

“...the most **cost-effective** and **efficient transmission access** to renewable energy resources in northern Maine ...**maximize benefits to the State**”

The **most cost effective way for energy created in northern Maine** to maximize benefits to the State is to have it **connect directly to infrastructure in that area.**

This would **promote local energy generation**, alleviating much of the need to transmit energy from elsewhere, **lower costs** to adjacent residents and **provide an ongoing income** to communities hosting these projects.

**Lowering energy costs locally would improve the local economy and promote business development in that area.**

Any **surplus energy could be sold to adjacent areas of the state** going first through current infrastructure which should be improved upon by reinvesting revenue (rates and REC's) from locally generated energy.

Any **surplus** beyond that **could be sold** to the ISO New England System *after* filtering down from northern Maine through adjacent communities.

**Any project approved should serve Maine first** and force a retrofitting of any substandard infrastructure incapable of sustaining larger throughput of electricity.

In other words, **any energy derived by projects paid for, in full or part, by Maine ratepayers, should directly benefit residents.** When we have reached our statewide renewable energy goals, *then* we can address any commitment to the ISO New England grid.

“...use of **existing utility and other rights-of-way** and other existing transmission corridors”

See:

(L.D. 2087) "**An Act to Protect Property Owners by Preventing the Use of Eminent Domain to Build Transmission Lines Under the Northern Maine Renewable Energy Development Program**" (SP0880) (Presented by Senator CURRY, C. of Waldo) (Cosponsored by Senator LAFOUNTAIN, D. of Kennebec, Senator NANGLE, T. of Cumberland, Senator RENY, C. of Lincoln) Approved for introduction by a majority of the Legislative Council pursuant to Joint Rule 203.

“...likely to provide a **reduction in transmission costs and costs to ratepayers for electricity over time** as more energy is transmitted using the line or lines...”

See above **cost-effective** and **efficient transmission access**

“The commission may consider and... select a proposal or proposals that **include both the development and construction of the line or lines ...and the development and construction of one or more qualified renewable energy generation projects...**”

**Mainers are reluctant to approve any new transmission corridors.** The destruction of **our forests that act as a carbon sequestration shield** is not an acceptable sacrifice to cater to the needs of the rest of New England.

Instead **we should focus on locally generated energy projects that utilize and improve existing infrastructure** that has proven itself unable to handle even the current negligible input of solar.

Rather than trying to transmit energy from one part of the state to the rest of New England, **we should focus on local areas, improving current methods of transmission,** rather than working around them.

“The commission shall approve a **contract or contracts between one or more transmission and distribution utilities ... except that, if at the close of the competitive bidding process the commission determines that no proposal meets the requirements ... or ... is not in the public interest,** the commission may **reject all proposals** and may open a new competitive bidding process...”

Again, **more input is needed from Mainers in deciding what projects are in the public interest.** We should hold more public comment periods and hearings in each potential area designated for development.

**Independently owned small generation and cogeneration facilities** would foster reliable, cost effective development in currently unserved and underserved communities.

## Conclusion

I was pleased to see the PUC opt out of the agreement with LS Power for the development of the ARG transmission corridor. After attending the Howland stakeholders' meeting I was left with concerns about the course of the line, which traversed land I was very familiar with, and the reluctance of LS Power representatives to be forthcoming with information.

I've attached an **email correspondence between LS Power Senior Vice President Lawrence Willick** and myself over the course of the summer. VP Willick was very forthcoming and gracious in answering my plethora of questions. Although the contract with LS Power may no longer be on the table, I hope the EUT may find the information in those emails valuable in its future decision making.

I have also included a comprehensive article (See “**Foreign Investors Will Reap 92 Percent of Profits...**” below) regarding the **investment structures of LS Power and Longroad Energy** by out of state and out of country investors. Any decision the commission makes regarding partners should prioritize Maine and U.S. energy goals first.

I would also encourage the **committee to consider allowing generation and distribution to be owned by the same entity where generation is fewer than 80 megawatts**, (See FERC <https://www.ferc.gov/qf> ). This would **discourage adding to the monopoly** we see today with incumbent utilities, **provide funding** in the form of federal and state support and **add revenue from the sale of REC's** for small renewable energy projects to be reinvested back into the infrastructure instead given to shareholders.

**Waiving the separation of distribution and generation** for smaller projects would also **encourage local development and create revenue** giving **local control** over how and where energy is created and distributed. We could grow our energy supply gradually, **skirting the process of legislative approval needed for large investments (>\$1B)**, eliminating the need for long term contracts or investment in large scale projects.

We could **modify such projects over shorter periods of time** to adapt to the ever changing costs of global energy supply and newly developed technology, allowing us to **evaluate the impact and benefits** of such projects **without** the inflexibility of **involving outside entities if changes must be made**.

Senator Jackson's amendment is a step in the right direction. But **Mainers should not be forced into an agreement that goes against our way of life**, or negatively impacts our land. Maine is a long state and **each region has its own natural resources for renewable energy generation**: river, wind, solar and tide.

Each region should be allowed to **choose what best fits their needs and benefits their area** rather than forcing a 'one size fits all' approach. Let Mainers decide how best to meet our energy needs and **let each region bear the burden and benefit** from those decisions.

As each region develops they can **merge resources to fortify our statewide energy infrastructure** creating a reliable, cost effective collaboration ensuring Mainers will have a **more robust system of generation and distribution** that directly benefits our state. Think **Venn Diagram** rather than a **single linear source** of transmission.

Focusing on **our contribution to the ISO New England grid does not directly benefit the rural areas of northern Maine** as it draws away efforts from stabilizing our local grids to achieve a goal that **may not be practicable in the given timeframe**. It also adds to the cost to ratepayers as **energy is sent southward below Augusta only to be rerouted back up to its point of origin**.

After all, how does it further our renewable energy goals when we are forced to utilize an **unreliable grid that necessitates dependence on fossil fuels to travel or run our homes and businesses** when it fails us?

Instead let's **focus on creating a more reliable localized system of renewable energy** that first takes care of Mainers, and then worry about our place in the greater picture.



We cannot give if we do not have.

Respectfully,

Kat Taylor  
Argyle Twp.

*'Never forget that your equipment was made by the lowest bidder'*

*Murphy's Laws of Combat* (from an unnamed army colonel) printed in newspapers in 1989.



# 131st MAINE LEGISLATURE

## FIRST SPECIAL SESSION-2023

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Legislative Document

No. 1963

S.P. 799

In Senate, May 18, 2023

### **An Act Regarding the Future of Renewable Energy Transmission in Northern Maine**

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Reference to the Committee on Energy, Utilities and Technology suggested and ordered printed.

A handwritten signature in black ink, appearing to read 'D M Grant'.

DAREK M. GRANT  
Secretary of the Senate

Presented by President JACKSON of Aroostook.

1 **Be it enacted by the People of the State of Maine as follows:**

2 **CONCEPT DRAFT**

3 **SUMMARY**

4 This bill is a concept draft pursuant to Joint Rule 208.

5 This bill would enact provisions of law regarding renewable energy transmission in the  
6 northern part of the State.

## Proposed Amendment to LD 1963

Amend the bill by striking out everything after the enacting clause and inserting the following:

Sec. 1. 35-A MRSA § 3210-I, sub-§1 is amended to read as follows:

**1. Program established.** The Northern Maine Renewable Energy Development Program, referred to in this section as "the program," is established to remove obstacles to the use of and to promote development of the substantial renewable energy resources in northern Maine. As used in this section, "northern Maine" means Aroostook County and any other area of the State in which the retail market is administered by the independent system administrator for northern Maine.

The commission shall administer the program in accordance with this section and shall ensure that such administration accounts for and is designed to advance the renewable energy and climate policies and goals of the State and to:

A. Encourage the rapid development of renewable resources in northern Maine to achieve greenhouse gas emissions reductions in the State and realize direct and near-term economic benefits in northern Maine;

B. Develop the transmission infrastructure necessary for the State to expeditiously meet its renewable energy and climate goals using, to the extent practicable, renewable energy resources located in the State;

C. Transition the State's mandated renewable energy purchasing through contracting approved and ordered by the commission in accordance with this section for the purchase of capacity, renewable energy and renewable energy credits, or any combination thereof, in a manner designed to most effectively account for the changing seasonal, time of day and other electricity usage characteristics associated with beneficial electrification as defined in section 10102, subsection 3-A over the duration of such contracts;

D. Promote energy equity with particular consideration given to the economic circumstances and opportunities in the State's socially vulnerable counties and communities. For the purposes of this paragraph, "socially vulnerable counties and communities" means those counties and communities in the State containing populations that are disproportionately burdened by existing social inequities or lack the capacity to withstand new or worsening burdens; ~~and~~

E. Recognize that, in advancing the renewable energy and climate policies and goals of the State, the near-term development of the transmission and other infrastructure necessary to reduce greenhouse gas emissions is in the public interest; ~~and~~

F. Seek, in collaboration with the Governor's Energy Office, established in Title 2, section 9, to partner with other states or entities in the procurement of infrastructure pursuant to subsection 2 and renewable energy generation projects pursuant to subsection 3.

Sec. 2. 35-A MRSA § 3210-I, sub-§2 is amended to read as follows:

**2. Request for proposals; generation connection line infrastructure.** The commission shall issue a request for proposals for the development and construction of ~~a 345-kilovolt double-circuit generation connection line, or, in the commission's discretion, a transmission line or lines of greater capacity,~~ **infrastructure necessary to connect up to the maximum number of megawatts permitted by ISO-New England of renewable energy resources** located in northern Maine and developed pursuant to subsection 3 with the electric grid operated by the New England independent system operator, referred to in this section as "the ISO-New England system." **The commission may issue preliminary requests for information from utilities and private developers or release draft requests for proposals to gather information to inform the program. The commission may develop a request for proposals and evaluate proposals in coordination with other states or entities.**

A. The proposals **must be required to cover a contract term of 30 years, except that the commission may, in its discretion, approve a contract term of a different duration, and must include provisions for the construction, development and subsequent commercial operation of the line or lines** described in this subsection.

B. The commission shall **evaluate the proposals** received based, at a minimum, on the following factors: **cost, economic benefit to northern Maine, the qualifications of the bidder or bidders, the long-term viability of each proposal and the anticipated contribution of each proposal toward the achievement by the State of its renewable energy goals under section 3210.** The commission shall **disqualify any proposal that, in the commission's determination, fails to demonstrate the bidder's technical and financial capacity to successfully construct, develop and operate the line or lines described in this subsection and to pursue, negotiate and contract for its interconnection with the ISO-New England system.**

C. The commission shall give **preference** to proposals that:

(1) In the commission's determination, in the aggregate with proposals received under subsection 3, demonstrate the **most cost-effective and efficient transmission access to renewable energy resources in northern Maine** in a manner that best supports the achievement of the State's renewable energy goals under section 3210 and that **maximize benefits to the State;**

(2) **Favor use, where practicable, of existing utility and other rights-of-way and other existing transmission corridors in the construction of the line or lines described in this subsection; and**

(3) In the commission's determination, are likely to provide a **reduction in transmission costs and costs to ratepayers for electricity over time as more energy is transmitted using the line or lines** described in this subsection.

D. The commission may consider and, in accordance with the applicable provisions of this subsection and subsection 3, **select a proposal or proposals that include both the development and construction of the line or lines described in this subsection and the development and construction of one or more qualified renewable energy generation projects** described in subsection 3.

E. ~~No later than November 1, 2022, the~~ The commission shall approve a contract or contracts between one or more transmission and distribution utilities and the bidder of any proposal selected by the commission in accordance with this subsection, except that, if at the close of the competitive bidding process the commission determines that no proposal meets the requirements of this subsection or that approval of a contract or contracts that otherwise meet the requirements of this subsection is not in the public interest, the commission may reject all proposals and may open a new competitive bidding process under this subsection.

**Sec. 3. 35-A MRSA § 3210-I, sub-§3** is amended to read as follows:

**3. Request for proposals; renewable energy generation projects.** The commission shall issue a request for proposals for the development and construction of qualified renewable energy generation projects in northern Maine designed to connect to and transmit generated power using the line or lines to be constructed pursuant to subsection 2. The commission shall make every effort to ensure that the competitive bidding process directed by this subsection results in the approval of contracts pursuant to paragraph E ~~no later than November 1, 2022.~~ As part of the request for proposals under this subsection, the commission shall make available to potential bidders any relevant information submitted to the commission by the bidder or bidders whose proposal or proposals were approved for contracting under subsection 2. The commission may develop a request for proposals and evaluate proposals in coordination with other states or entities. Except as provided in paragraph B, subparagraph (2), renewable energy generation projects on which construction commenced prior to September 30, 2022 are not qualified for the purposes of this subsection.

## SUMMARY

The amendment replaces the bill, which is a concept draft. It does the following:

1. It requires the Public Utilities Commission, in collaboration with the Governor's Energy Office, to seek other state or entities to partner with for the procurement of infrastructure and renewable energy generation projects;
2. It allows the commission to develop a request for proposals and evaluate proposals in coordination with other states or entities for both infrastructure and renewable energy generation projects; and
3. It requires the commission to issue a request for proposals for infrastructure necessary to connect up to the maximum number of megawatts of renewable energy resource located in northern Maine instead of a 345-kilovolt double circuit generation connection line, or a transmission line or lines of greater capacity.

Tuesday, January 16, 2024

RE: Kat Taylor Testimony on LD 1963 *An Act Regarding the Future of Renewable Energy Transmission in Northern Maine*

To Whom It May Concern:

The following is an email thread between **LS Power Senior Vice President Lawrence Willick** and me over the course of the summer.

It contains **many of the questions posed in testimony** and by the EUT Committee. Here they are **answered by a senior executive of LS Power**.

The **text has not been edited for content**, but I have omitted my email address for privacy reasons and left the public email addresses of those I cc'd because of their involvement with the ARG.

I have **deleted** any **disclaimers** of **outside** firewall **origin**  
I have **colored text** for ease of scanning.  
Quotes are **indented** and *italicized*.

**The thread is in reverse chronological order**. If you want to read it chronologically, I suggest you begin at page 20 and work your way up. It helps to read the questions before the answers.

- The dates sent are highlighted in **yellow**
- My text is **orange**
- VP Willick's is **blue**
- My comments are in **black**

The next document *Foreign Investors Will Reap 92 Percent of Profits from Aroostook County's King Pine Wind Power Scheme* is the most comprehensive news article I have found regarding **both** the ARG and KPWF projects.

It was published in the **Maine Wire** (<https://www.themainewire.com/2023/09/foreign-investors-will-reap-92-percent-of-profits-from-arostook-countys-king-pine-wind-power-scheme/> )

and **Wind Watch** (<https://www.wind-watch.org/news/category/locations/americas/us/maine/> ) news outlets.

There are links and attachments that may not be visible in this PDF.

If you would like me to supply those additionally I would be happy to comply.

If you would like me to supply an electronic copy for use on your digital device just ask.

I hope this information will assist you in your deliberations.  
Please let me know if you have any questions.

Kat Taylor

On **Wed, Oct 25**, 2023 at 2:29 PM Lawrence Willick <LWillick@lspower.com> wrote:

Kat-

I will do my best to try and response to your questions. I have repeated your questions below with responses in italics.

*Was Carolyn C. Gilbert, a former Managing Consultant at Daymark Energy Advisors, involved in anyway with the Daymark study?*

Response: No, as far as I know, **Carolyn Gilbert did not perform any work on our study while she was employed at Daymark. Commissioner Gilbert recused herself from the MPUC decision to end the deal with LS Power**

*Why did LS Power pay for an additional study? (see attached) "The Macroeconomic Impacts of the Aroostook Renewable Gateway on the Maine Economy" Prepared For LS Power Grid Maine, LLC Prepared by Wallace Economic Advisers, LLC- October 2023*

Response: These two studies are related to different impacts of the Aroostook Renewable Gateway and King Pine:

- The **Daymark study relates to the electricity market benefits** – both the direct benefits of the fixed price electricity relative to future electricity prices as well as the impact of the zero-fuel cost electricity in the energy market, and the related benefits to Maine electricity customers.
- The **Wallace study is a traditional economic impact study** that looks at the tax payments, jobs, and other economic impacts of the construction and operation of the projects within Maine.

*According to the Daymark study, on page 6, Mainers may be saving \$887 million in rates over a 25 year contract (30 years minus 5 for construction) after completion of the corridor and depending on the price of natural gas (Page 14 "Therefore, the natural gas price assumptions are a critical driver to our modeling and results.") Yet Mainers are paying about \$1.4 billion for half the corridor construction.*

*How are Mainers saving money when we're spending \$513,000,000 more than what we reap in savings?*

Response: The Daymark study concludes Mainers are saving more money than is being spent, due to **the avoided cost of natural gas-fired generation**. Without the wind generation from King Pine, Maine would be importing much more expensive natural gas to fuel power generation, and payment more for all of the generation in the ISO-NE market. **The Daymark study concludes the savings to Mainers would be much greater than the costs of payments to LS Power and King Pine.** I would note that the \$1.4 billion cost that you cite is not consistent with how the savings in the Daymark study are calculated. I believe your **\$1.4 billion is calculated as half of the \$2.8 billion transmission line cost** that was identified in the PUC Order. **That value can be confusing because it is not really explained.** My understanding of the \$2.8 billion value is that it is the total cost of all payments under the transmission contract over the entire term which is much higher than the initial capital cost. It is also in year of



occurrence dollars, while the Daymark study values are on a net present value discounted basis. Think of a buying a house for \$100,000 with a mortgage. The total cost of home ownership over 30 years with the mortgage payments as well as maintenance and upkeep would be over \$250,000. Those same payments, discounted on a net present value basis would be \$160,000. So in this house example, someone might say the cost of the house is \$100,000, or \$250,000, or \$160,000. I hope that is not too confusing, **my point is just that the \$1.4 billion is not comparable to the Daymark savings.**

*If Massachusetts is paying 40% (Page 7) of the cost of the ARG and Mainers are paying for the rest of the corridor, why is it going to be owned by LS Power?*

Response: This might be a rhetorical question, but I will attempt to answer. We operate like any other privately owned business. For example, Mainers pay for all of the gasoline purchased at filling stations in Maine (Maine drivers, businesses and visitors buy all of the gasoline in the state) **but just because Mainers pay for all of the costs it doesn't mean that Mainers will own all of the filling stations. However, Mainers would not be paying to build the gas stations**

*Once the 30 year contract ends is there any guarantee that Maine will have access to the ARG? or will LS Power have exclusive rights?*

Response: At the end of the contract, LS Power will continue to have an obligation to serve the public. The assurance that **Maine will have access to the ARG is in the open access requirements** of the transmission grid. **Do "Open Access" requirement apply to existing corridors?**

*Who will own the Renewable Energy Credits (REC's) generated by the ARG corridor and the KPWF?*

Response: I do not know the details of the arrangements that King Pine has regarding the sale of their **Renewable Energy Credits.**

*Were the 6 Longroad wind farms in the Pittsfield and Augusta areas a determining factor in LS Power's decision to route the corridor through that region?*

Response: No, existing wind farms were not a consideration in the transmission line routing. **The requirement of the solicitation that LS Power responded to was to integrate new wind generation in Aroostook County into the ISO-NE system in the least cost, most efficient manner.** LS Power **identified the northern terminal in Aroostook County and what it believed are the minimum set of facilities to integrate those resources into ISO-NE,** which defined the scope of facilities it proposed.

*Is LS Power contributing funding to oppose or support any referendums in the Nov 7 election? If so, which ones?*

Response: No, LS Power is not contributing to oppose or support any referendums in the Nov. 7 election.

*If **Question 1** passes, will the ARG and KPWF need additional voter approval to continue? (See attached)*

*The question: Do you want to bar some quasi-governmental entities and all consumer-owned electric utilities from taking on more than \$1 billion in debt unless they get statewide voter approval?*

Response: No, LS Power will not need additional voter approval in the event Question 1 passes. **LS Power is not a quasi-governmental entity or consumer-owned electric utility, and LS Power will not require more than \$1 billion in debt.**

*Doug Mulvey was quoted in the media as saying **LS Power will hold additional public meetings.***

*When can we expect those meetings to be scheduled?*

*Response: We do not know when those meetings will be scheduled, but will provide notice when they are scheduled.*

*I hope you will find these responses to be helpful.*

*Lawrence*

**From:** k a t  
**Sent:** Tuesday, October 17, 2023 12:48 PM  
**To:** Lawrence Willick <[LWillick@lspower.com](mailto:LWillick@lspower.com)>  
**Cc:** Douglas Mulvey <[DMulvey@lspower.com](mailto:DMulvey@lspower.com)>; Troy Jackson <[troy.jackson@legislature.maine.gov](mailto:troy.jackson@legislature.maine.gov)>; Tipping, Mike <[Mike.Tipping@legislature.maine.gov](mailto:Mike.Tipping@legislature.maine.gov)>; Gary Drinkwater <[rph20@aol.com](mailto:rph20@aol.com)>; [Richard.Bennett@legislature.maine.gov](mailto:Richard.Bennett@legislature.maine.gov); Stacy Brenner <[Stacy.Brenner@legislature.maine.gov](mailto:Stacy.Brenner@legislature.maine.gov)>; [Steven.Foster@legislature.maine.gov](mailto:Steven.Foster@legislature.maine.gov); [Nicole.Grohoski@legislature.maine.gov](mailto:Nicole.Grohoski@legislature.maine.gov)  
**Subject:** Re: \*ext\* stakeholders meetings

Good Afternoon Lawrence

I hope you enjoyed your end of summer. I'm sure you haven't missed my endless questions and I appreciate your patience and accessibility. Giving you a break also allowed me to digest the Daymark study on the potential benefits from the Aroostook Renewable Gateway (ARG) and the King Pine Wind Farm (KPWF).

I just have a few more questions for you if you would be so kind.

The Daymark study, paid for by Longroad and LS Power, was the study done on the benefits the of the ARG and the KPWF that legislatures used to determine their viability.

Was Carolyn C. Gilbert, a former Managing Consultant at Daymark Energy Advisors, involved in anyway with the Daymark study?

Why did LS Power pay for an additional study? (See attached)

*"The Macroeconomic Impacts of the Aroostook Renewable Gateway on the Maine Economy"*

Prepared For LS Power Grid Maine, LLC by Wallace Economic Advisers, LLC  
October 2023

I haven't had the time to read the new study but it seems as if it's more of the same projections based on the same current models and I'm not sure how much different it is from the Daymark study. Maybe you can shed some light on it for me.

According to the Daymark study, on page 6, Mainers may be saving **\$887 million in rates over a 25 year contract** (30 years minus 5 for construction) **after completion of the corridor and depending on the price of natural gas** (Page 14 **"Therefore, the natural gas price assumptions are a critical driver to our modeling and results."**)

Yet Mainers are **paying about \$1.4 billion** for half the corridor construction.

How are Mainers saving money when we're **spending \$513,000,000 more** than what we reap in savings?

On Fri, Aug 4, 2023 at 3:56 PM you wrote:

7. *Our company, LS Power Grid Maine, LLC, will own the ARG. Citizens can report issues to us. We will be responsible for any issues related to the project.*

If **Massachusetts is paying 40%** (Page 7) of the cost of the ARG and Mainers are paying for the rest of the corridor, **why is it going to be owned by LS Power?**

Once the 30 year contract ends is there any guarantee that Maine will have access to the ARG? or will LS Power have exclusive rights?

Who will own the Renewable Energy Credits (REC's) generated by the ARG corridor and the KPWF?

Were the **6 Longroad wind farms in the Pittsfield and Augusta areas** a determining factor in LS Power's decision to route the corridor through that region?

Is LS Power **contributing funding to oppose or support any referendums** in the Nov 7 election?

If so, which ones?

If **Question 1** passes, will the ARG and KPWF need additional voter approval to continue? (See attached)

*The question: Do you want to bar some quasi-governmental entities and all consumer-owned electric utilities from taking on more than \$1 billion in debt unless they get statewide voter approval?*

Doug Mulvey was quoted in the media as saying **LS Power will hold additional public meetings.**

When can we expect those meetings to be scheduled?

As always I appreciate your candor and time. I wish we had such access to Longroad Energy so Mainers could make informed decisions on renewable energy efforts that affect our state.

I hope you get a chance to see the fall foliage in Maine.

Enjoy your day

Kat Taylor

Argyle Twp.

On **Tue, Aug 22, 2023** at 6:53 PM Lawrence Willick <[LWillick@lspower.com](mailto:LWillick@lspower.com)> wrote:

Kat-

I am sorry for the relatively slow response, but have been traveling (unfortunately not to Maine but at least I have escaped the St. Louis heat).

**The Northern Maine Renewable Energy Development Program was structured to have the transmission line in service before the generation**, in a coordinated manner. The process takes advantage of the fact that the construction for a wind or solar project is shorter than the construction of a transmission line.

So King Pine's milestones for completion of their permitting and their construction are tied to the beginning of our construction. So **in the base case there could be a small gap between when our facility is completed and their facility is completed**, with an effort to coordinate to minimize that time. If they are delayed, that time could be longer.

To answer your one question directly, **yes, ratepayers would pay for our project even if there is a time they have to wait for King Pine to be built**. This is the same for other utility construction projects, where **rate payers begin to pay as soon as construction is completed**. Also, the King Pine project is sized for 1,000 MW and our project is capable of delivering 1,200 MW, so **there could be another 200 MW of generation that would connect and deliver on our line** (including possibly during any period when King Pine is delayed). Obviously that is not the full capacity of the line, but it could still be put to use for the benefit of ratepayers.

Regarding the possibility of public power, my understanding is that if the State takes over Versant and CMP distribution, our contracts would follow the ownership of these entities. I am not sure what would happen in the case where Mainers would deny permits for the King Pine project. **I am not aware of a "Plan B" if the King Pine project does not get built, but our transmission line can accommodate any generation from Aroostook County, up to 1,200 MW.**

**We estimate 5 to 10 permanent employees** after completion of construction.

The GIS mapping was available at the public meetings, or we can work with an individual landowner to provide more specific mapping, **but there is not a link to our GIS mapping**. There is a complete set of the static maps which identify the alternative locations and specific parcels directly impacted and adjacent. We are evaluating and considering the comments we have received to potentially add, modify, or eliminate routes from consideration.

I am sorry that my prior answer on vegetation management wasn't more clear. The purpose of **our vegetation management would be to prevent vegetation growth that would pose a safety hazard by growing to a height that it could cause a hazard under the National Electrical Safety Code**, and also to **prevent excessive vegetation on access roads**. We would not do any aerial spraying of pesticides or herbicides. Since we are just interested in controlling the vegetation growth, we do not use pesticides.

Our contact information is available on our website and also on our written materials, for example in the letters we provided to all of the landowners impacted by the proposed routes,

including abutting landowners. This includes a local Maine number, a toll-free number, an email address, and a form that can be filled out.

I do appreciate your diligence in looking into the project, and am happy to try and answer more questions you might have as they come up.

Sincerely,

Lawrence

**From:** k a t

**Sent:** Wednesday, August 16, 2023 5:35 AM

**To:** Lawrence Willick <[LWillick@lspower.com](mailto:LWillick@lspower.com)>

**Cc:** Douglas Mulvey <[DMulvey@lspower.com](mailto:DMulvey@lspower.com)>; Troy Jackson <[troy.jackson@legislature.maine.gov](mailto:troy.jackson@legislature.maine.gov)>; Tipping, Mike <[Mike.Tipping@legislature.maine.gov](mailto:Mike.Tipping@legislature.maine.gov)>; Gary Drinkwater <[rph20@aol.com](mailto:rph20@aol.com)>; [Richard.Bennett@legislature.maine.gov](mailto:Richard.Bennett@legislature.maine.gov); Stacy Brenner <[Stacy.Brenner@legislature.maine.gov](mailto:Stacy.Brenner@legislature.maine.gov)>; [Steven.Foster@legislature.maine.gov](mailto:Steven.Foster@legislature.maine.gov); [Nicole.Grohoski@legislature.maine.gov](mailto:Nicole.Grohoski@legislature.maine.gov)

**Subject:** Re: \*ext\* stakeholders meetings

Hi Lawrence

I hope you're doing well. Sorry for the late response but I've been participating in the DEP Waste Management Plan stakeholders' meetings. Mainers are facing issues with toxic chemicals in waste water treatment sludge and trying to address widespread PFAS contamination so public participation is essential.

Toxic 'forever' chemicals on farmland is a hot issue right now with no solutions in sight.

**Many of the towns the ARG will traverse are listed as PFAS sites** already and many locals feel adding a transmission corridor to already stressed farmland is too much.

You can view affected towns here:

<https://www.maine.gov/dep/spills/topics/pfas/PFAS%20Investigation%20Tiered%20Community%20List%207.28.23.pdf>

and I've **attached the PDF** "*PFAS Investigation Tiered Community List – Tiers I-III: August 2023*" from the DEP for your convenience.

Also, I've been researching recent evidence that **wind turbine blades may contain PFAS and BPA** chemicals spread by **leading edge erosion** and need a closer look. Currently **the only solution for decommissioned turbine towers and blades is landfill, which is at the bottom of Maine's Waste Hierarchy.**

That's one of the reasons I'm being so persistent in researching **the environmental impact** of the ARG and the KPWF projects **before we get to a point beyond contamination and are stuck with remediation** efforts.

An ounce of prevention is worth a pound of cure.

LS Power has set a **timeline** to have the ARG **completed** by the end of 2028.

But the KPWF construction is estimated to **begin** in 2028.

Will the ARG sit **idle** until the wind farm is finished?

In other words, **does the ARG have to finish its entire proposed route, and wait for KPWF completion, before it will be of public benefit** in adding **renewable energy to the Maine grid?**

In the **meantime**, are there **any other**, either **Maine based or not**, **renewable energy projects** that will **connect to the grid using the ARG** or will the project be paused waiting for the **KPWF**?

If **Mainers vote in public power** and **deny permits for the KPWF** will **LS Power stop the ARG project until approval is granted or continue on regardless of the KPWF status**?

Is there a **Plan B** if the **KPWF takes longer to complete**, as we are seeing with the **NECEC**, or **never gets built**? **How will the ARG be used then**?

I've **attached a copy of the Pine Tree power petition** we will vote on this November.

Will **ratepayers have to pay for the ARG while waiting** for power to be connected?

**How many full time employees** will the ARG employ **post construction**?

*3. We are trying to identify the best route that meets the identified need ...also provided real time GIS mapping stations for landowners at the public meetings.*

GIS...what a simple solution!

**Would you please send me the links for your GIS Mapping of the route?** And if you could **post the links on the same page as the stakeholders' meeting materials** it would be **helpful for the public and policy makers** to be able to **view parcels in a dynamic environment** rather than looking at static low resolution maps with no labels.

**GIS would enable a granular view of each parcel so the public and policy makers can determine the best possible route.**

*6. During operation, vegetation management might include moving, mechanical trimming, and may include selective application of herbicides. We do not use aerial spraying of pesticides. The goal of these activities would be to prevent woody vegetation growth that could enter the wire safety zone, and to maintain access roads. Areas of active farming would not need vegetation management by LS Power.*

**"Selective application of herbicides"** does not necessarily mean **no aerial spraying**.

You mention no aerial spraying of **pesticides** but not **herbicides**.

Will **pesticides** be used and for what purpose?

Will **aerial spraying of herbicides** be used?

*7. Our company, LS Power Grid Maine, LLC, will own the ARG. Citizens can report issues to us. We will be responsible for any issues related to the project.*

What is the **contact information for citizens to report issues** and expect a response in a timely manner?



Thanks again for your time.

Enjoy your week.

Kat

On **Fri, Aug 4**, 2023 at 3:56 PM Lawrence Willick <[LWillick@lspower.com](mailto:LWillick@lspower.com)> wrote:

Kat-

Happy to do my best to answer your questions and clarify where possible. There is a lot of information out there to digest. Responses to your questions by topic are listed below.

1. I am not familiar with the specifics of the terrain around Rabbit Run relative to the proposed routes, but in the routing we tried to minimize impacts to people and the environment, and one of those factors is to avoid wetlands to the greatest extent possible.
2. Regarding state lands, **state lands are often sensitive areas such as a park or preserve, so routing on private lands is often less impactful**. That being said, we have considered a number of route alternatives, including some that would have impacted state lands.
3. We are trying to identify the best route that meets the identified need. **The current routes were identified to minimize impacts on people and the environment**. The June 26, 2023 article was prior to the several proposed alternate routes that have been made public, and were what we presented in our public meetings and are included on the maps that are publicly posted on our website. **All town names and roads are not labeled on the maps because in many cases it makes the maps more cluttered and as a result more difficult to read**, but we are willing to **provide more specific map information on request**. We also **provided real time GIS mapping** stations for landowners at the public meetings.
4. You are correct that I had not been in Northern Maine prior to the public meetings (not further north than Bangor), but Jason Niven our routing lead has. In response to your question, Jason told you that he did not walk the entire route, because we do not have the right to access private land, and we have not asked landowners for the right of entry at this early stage of the process. Jason also told you that he **has done extensive investigations in the field, including viewing all routes at road crossings and other publicly accessible locations along with videoing alternative routes from a helicopter**. He was **not relying exclusively on satellite imagery and maps**. Our local consultants also have done investigations and have knowledge of the area that went into the development of the initially proposed routes.
5. Regarding Kibby Wind, **it is owned by an affiliate of LS Power**. I am not directly involved in that part of the business, but can tell you what I do know. It is currently operating (not sure why it was identified somewhere as “temporarily closed”), and was **purchased by an LS Power company from TransCanada in 2017**. It is **132 MW** (I am not sure how many turbines that is) and has been **connected to the ISO-NE power grid since it was initially constructed**. It has nothing to do with the Aroostook Renewable Gateway project, other than being **owned by the same ultimate parent company**. The ARG will not connect with the Kibby project. The writer of the Press Herald article is mistaken. I do not know anything about any plans to update the equipment at Kibby.
6. **During operation**, vegetation management might include mowing, mechanical trimming, and may include selective application of herbicides. We do **not use aerial spraying of pesticides**. **The goal of these activities would be to prevent woody vegetation growth that could enter the wire**

**safety zone, and to maintain access roads.** Areas of active farming would not need vegetation management by LS Power. Invasive Species proliferation by reducing competitor species was mentioned at the hearing.

7. **Our company, LS Power Grid Maine, LLC, will own the ARG.** Citizens can report issues to us. We will be responsible for any issues related to the project.

Have a good weekend,

Lawrence

**From:** k a t  
**Sent:** Tuesday, August 1, 2023 9:37 AM  
**To:** Lawrence Willick <[LWillick@lspower.com](mailto:LWillick@lspower.com)>  
**Cc:** Douglas Mulvey <[DMulvey@lspower.com](mailto:DMulvey@lspower.com)>; Troy Jackson <[troy.jackson@legislature.maine.gov](mailto:troy.jackson@legislature.maine.gov)>; Tipping, Mike <[Mike.Tipping@legislature.maine.gov](mailto:Mike.Tipping@legislature.maine.gov)>; Nicole.Grohoski@legislature.maine.gov; Gary Drinkwater <[riph20@aol.com](mailto:riph20@aol.com)>; [Richard.Bennett@legislature.maine.gov](mailto:Richard.Bennett@legislature.maine.gov); Stacy Brenner <[Stacy.Brenner@legislature.maine.gov](mailto:Stacy.Brenner@legislature.maine.gov)>  
**Subject:** Re: \*ext\* stakeholders meetings

Hi Lawrence

Thanks for getting back to me. I appreciate your quick response and candor.

You mention avoiding **bogs/wetlands** in your response. There are bogs and wetlands between the route's digression west from Howland down to between Hudson and Corinth, an area locally known as the Rabbit Run.

I grew up just up the Hudson Hill Rd from the Rabbit Run and used to help my father tend his trap lines in the swamp. It is not navigable by foot or boat in the summer and remains so unless the water is frozen. Beaver and muskrat abound as well as deer and moose; it is a popular hunting/trapping ground.

It doesn't seem hospitable to large transmission line projects if you are concerned with bogs and wetlands.

**Why was this area chosen if LS Power's goal is to avoid this type of terrain?**

**You mention avoiding state lands.** Mr. Mulvey is quoted as saying LS Power avoided state lands because the company would **need additional approval from the Legislature** to use those parcels. Under Maine law, **developers must get two-thirds approval from the Legislature for transmission projects that cross state lands.** (ATV trails designated as state lands was mentioned during the hearing. If there is no fencing around a corridor easement then ATV traffic would not be affected.)

**If the state is onboard with the Aroostook Renewable Gateway,** it seems that crossing state land, instead of private, would **gain policy makers' approval**, avoiding the use of **eminent domain**. This may make the route more palatable to the public, especially the farmers in central Maine who have been most vocal in protesting the currently planned route claiming it will impact their productivity.

In a year when farmers have been **hit heavily with rain** and are **contending with the recent PFAS contamination** issue, it seems to me that **the state should be willing to allow transmission lines across publicly owned land to avoid putting more stress on an already stressed area.**

**Was the current route decided upon to take the path of least resistance, or to save money, rather than choosing the best route possible in achieving the state's renewable energy goals?**

Again, it would be helpful for the public to see the proposed alternate routes, hopefully including town, road and water body names to allow people to quickly reference proximity.

When I spoke with you and **Jason Niven** at the Howland meeting he said he had **not yet physically seen** the planned route but was **relying on satellite imagery and maps**.

Mr. Mulvey is quoted by the Portland Press Herald (link below):

*"The precise route of the corridor, its width and its potential environmental impact have not yet been made public. However, Doug Mulvey, vice president of LS Power Development, said the **company plans to publish several potential routes in the coming days.**" dated **June 26, 2023***

**When could the public expect to see the "several potential routes" LS Power explored?**

This may help pave the way toward approval by the public if we could offer local input on areas not yet physically explored and suggest alternate pathways based on local familiarity with the land.

Both you and Jason admitted to never being in Northern Maine before; you mentioned you had been to Acadia. So local input I think would be invaluable to the success of your project. It would behoove you to provide the public with as much information as possible to facilitate landowners' approval.

I also noticed **LS Power has a wind farm in western Maine at Kibby Mountain** that is cited as "temporarily closed".

[https://www.thewindpower.net/windfarm\\_map\\_en\\_11008\\_kibby-mountain-phase-i.php](https://www.thewindpower.net/windfarm_map_en_11008_kibby-mountain-phase-i.php)

**Kibby Wind Power** ( [https://en.wikipedia.org/wiki/Wind\\_power\\_in\\_Maine](https://en.wikipedia.org/wiki/Wind_power_in_Maine) )

*"The Kibby Mountain wind farm project—at a capacity of 132 MW<sup>[23]</sup>—comprises **forty-four** 3 MW wind turbines strung along the ridges of Kibby Mtn. (45°25.12'N 70°32.66'W) and nearby Kibby Range (45°21.13'N 70°34.58'W).<sup>[24]</sup> is expected to generate about 357 million kilowatt-hours (41 MW·yr) of electricity annually. **Half the turbines were put online in October 2009, and TransCanada completed the project in 2010.**<sup>[25]</sup> The capital cost of the project is approximately US \$320 million.<sup>[26]</sup> Work on clearing the site began by September 2008.<sup>[27]</sup> **Kibby was purchased by LS Power through its affiliate Helix Generation in 2017.**<sup>[28]"</sup>*

There seems to be conflicting information on Kibby.

**A recent news article implies connecting it to the ARG:**

*"...**44 wind turbines** in the Kibby Wind Power Project in Franklin County. A wind power project in Aroostook County will **connect it with the New England power grid for the first time.**" Sun Journal file photo*

( <https://www.pressherald.com/2023/06/26/northern-maine-power-line-project-moves-forward-slowly/> )

This article also mentions **44 turbines**, and online resources by the **NRCM**

( [https://www.nrcm.org/documents/kibby\\_construction\\_newsletter\\_1.pdf](https://www.nrcm.org/documents/kibby_construction_newsletter_1.pdf) ) and **Windpower**

( [https://www.thewindpower.net/windfarm\\_en\\_11008\\_kibby-mountain-phase-i.php](https://www.thewindpower.net/windfarm_en_11008_kibby-mountain-phase-i.php) ) **show 22** and also claims it is "operational".

**Could you please clarify the status of Kibby (Phase 1 & 2)? How is it currently connected and to which grid/ transmission line, # of turbines that are operational and how many planned ( I counted 22 using the Google Map feature) and if it is going to connect to the ARG?**

The NRCM/Wikipedia documents show the Kibby project **began in 2008 and was completed in 2010**. Does LS Power have **any plans to update the equipment?** And if so, **what will be done with the blades and turbine parts that are replaced?** How will the **materials be disposed of and/or recycled?**

**Will herbicides/pesticides be used in vegetation management of the ARG?**

**Will aerial spraying be used?**

As you probably know:

*"Maine's share of the power would be purchased by either Central Maine Power or Versant Power, or both. By law, neither company supplies or generates electricity."*

I have yet to find information on who will actually own the ARG. As far as I've determined, LS Power will maintain, ISO-NE will oversee, Versant and CMP will distribute and bill customers.

**Who will actually own the ARG?**

**Who will citizens report issues to? Who will be responsible for any fires, pollution, health issues, complaints, degradation of property and land values? Who will be accountable?**

Thanks again for your quick response and candor.

I look forward to your reply.

Meanwhile, if you are in Maine, enjoy the beautiful weather.

Kat Taylor

Argyle Twp.

On **Wed, Jul 26**, 2023 at 11:42 AM Lawrence Willick <[LWillick@lspower.com](mailto:LWillick@lspower.com)> wrote:

Kat-

Below are responses to your questions.

**There are several reasons for the diversion from the existing right of way south of Howland.** First of all, while there is a terminal of **our project near Windsor, electrically our project also requires a connection to the existing transmission line that runs from Orrington to Albion.** For **engineering reasons**, that connection needs to be further west on the line (**west of the Dixmont area**). In routing, we attempted to minimize impacts to people and the environment, and **that particular section of the route posed the most challenges including:**

- a number of **houses immediately adjacent** to the existing transmission line corridor,
- the existing corridor runs through the **Sunkhaze Meadows National Wildlife Refuge,**
- **wetlands/boggy areas,**
- **tribal lands,** and
- **state lands.**

Our company, **LS Power Grid Maine, LLC, will be maintaining the transmission line and performing vegetation management.** We will **establish local resources and inventory to do this work,** as we have for our other transmission line projects around the country.

My understanding is if Mainers vote in public power this November and the State takes over Versant and CMP distribution, our contracts would follow the ownership of these entities. The contracts with Versant and CMP would not need to be renegotiated.

Have a good day,

Lawrence

**From:** k a t  
**Sent:** Tuesday, July 25, 2023 7:47 AM  
**To:** Lawrence Willick <[LWillick@lspower.com](mailto:LWillick@lspower.com)>  
**Cc:** Tipping, Mike <[Mike.Tipping@legislature.maine.gov](mailto:Mike.Tipping@legislature.maine.gov)>;  
[Nicole.Grohoski@legislature.maine.gov](mailto:Nicole.Grohoski@legislature.maine.gov); Gary Drinkwater <[riph20@aol.com](mailto:riph20@aol.com)>  
**Subject:** Re: \*ext\* stakeholders meetings

Hi Lawrence

Thanks for getting back to me. I hope you enjoyed your weekend.

It's good to know that **LS Power is using an existing Right Of Way to Howland.**

Why don't you **go all the way down to the end destination using the same ROW since both the New Brunswick line and the ARG connect around Windsor?**

It's seems to me **that if LSP followed existing ROW's the ARG project would be cheaper and less controversial.**

What is the reasoning behind **using a more westerly path** over virgin territory and farmland?

Also, who is going to **maintain the transmission line?**

How will the **vegetation be managed?**

What will happen to current plans and contracts if Mainers vote in public power this November?

The public option would take over Versant and CMP distribution.

How does this change things?

Will we need to renegotiate contracts?

LSP is looking for public input so I'm doing my best to form a complete picture.

Thanks again for getting back to me

Enjoy your day

Kat Taylor

Argyle Twp.



On **Fri, Jul 21**, 2023 at 2:12 PM Lawrence Willick <[LWillick@lspower.com](mailto:LWillick@lspower.com)> wrote:

Kat-

Thanks for reaching out, and I am happy to answer your questions the best that I can.

1. We do not plan on connecting to the transmission lines from New Brunswick, but **do plan on using that corridor where practical, and follow it generally north of Howland**. South of Howland, where we are unable to follow these lines due to other constraints, we propose two alternative routes.

2. **Eminent domain is the option of last resort**. We intend to reach agreement with all landowners on the approved route, but **we would have the power of eminent domain for the route approved by the Maine Public Utilities Commission**. If we are not able to negotiate voluntary easements, we would have the ability to petition the PUC to use this right.

Regards,

Lawrence Willick

LS Power Development, LLC

16150 Main Circle Drive, Suite 310

Chesterfield, MO 63017

C: 314-374-8884

O: 636-532-2200

**From:** k a t  
**Sent:** Thursday, July 20, 2023 8:11 AM  
**To:** Lawrence Willick <[LWillick@lspower.com](mailto:LWillick@lspower.com)>  
**Subject:** \*ext\* stakeholders meetings

Hi Lawrence

This is Kat Taylor, we met at the Howland stakeholders meeting last week.

I had a couple of questions if you don't mind answering them.

The first is, there **are two transmission lines from New Brunswick that seem to coincide with LS Power's planned route.** Were you **planning on connecting to those existing lines?** Or using that corridor?

The second is regarding **eminent domain.** When I spoke with you and Nathan, you mentioned using eminent domain to gain access to properties along the route to complete planning of the route and to get the easements.

Is that still an option?

Unfortunately I can't make the last meeting today in person. I would love to attend online and your website mentions this may be an option later on.

I hope so, people want to learn more about these projects.

Thank you for taking the time last week to speak with me. Any information you can give me on these two questions is greatly appreciated.

Enjoy the day, the weather is finally decent.

Days like this are why we live in Maine ; )

Kat Taylor

Argyle Twp.

[themainewire.com](https://www.themainewire.com)

# Foreign Investors Will Reap 92 Percent of Profits from Aroostook County's King Pine Wind Power Scheme

*Steve Robinson*

21–26 minutes

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When the 170-turbine 1,000 megawatt King Pine Wind Farm in Aroostook County becomes operational near the end of the decade, the majority of the profits from the sale of electricity to New England ratepayers will head to the other side of the planet.

That's because Longroad Energy, the Boston-based developer that will manage the wind farm, is 92 percent owned by large foreign investment funds, including one controlled by a foreign government, according to financial records reviewed by the Maine Wire.

The NZ Super Fund – a.k.a. the New Zealand Superannuation Fund — reported owning 40 percent of Longroad Energy in 2021 and 2022, according to their annual report.

The \$34.23 billion fund, which is operated by the New Zealand government for the benefit of the nation's pension system, reports that Longroad is one of its "larger" green energy investments.

## Longroad Energy

The NZ Super Fund, alongside NZX-listed Infratil, has been invested in Longroad Energy Holdings since 2016. Over the year, Longroad achieved several project milestones across the United States, including the completion of the 200MW Sun

Streams 2 solar project in Maricopa County, Arizona. Over the 2021/22 financial year, the Guardians worked with co-investors and the Longroad management team to welcome a new investor, MEAG, acting as the asset management arm for entities of Munich Re, which was announced in August 2022. MEAG has committed to invest US\$300 million to acquire a 12% stake in Longroad Energy, subject to certain conditions.

The transaction implies a pre-money valuation for Longroad common equity of US\$2,000 million. The associated valuation uplift contributed to an increase in performance fees to Morrison & Co. These fees are subject to an annual payment cap and may be offset against future underperformance.

More information can be found on page 138 of our Financial Summary.

Excerpt from NZ Super Fund 2022 Annual Report (source)

Infratil, a [\\$5 billion](#) Wellington, NZ-based infrastructure investment company, owns another 40 percent of Longroad, according to its [recent](#) company reports.

Rounding out the firm's foreign investors is MEAG, a [€324 billion](#) German [asset management company](#).

MEAG [purchased](#) a 12 percent stake in Longroad in August 2022 for a reported [\\$300 million](#).

According to NZ Super Fund's public reporting, NZSF US Renewables, a subsidiary of the sovereign wealth fund, has provided Longroad energy with a letter of credit agreeing to backstop the firm's financial commitments.

\* Additionally, NZSF US Renewables, Inc. has committed to providing financial support to its joint venture, Longroad Energy Holdings, LLC in respect of a letter of credit taken on by that company. In the event that Longroad Energy Holdings, LLC is unable to pay any outstanding amount arising from the letter of credit as it falls due, NZSF US Renewables, Inc. may require additional funding from the NZ Super Fund to enable it to provide the required support. At balance date, the letter of credit totalled \$180,885,000 (equivalent to USD 112,466,000) (2021: \$184,302,000) of which NZSF US Renewables, Inc.'s share is \$90,443,000 (equivalent to USD 56,233,000) (2021: \$92,151,000).

NZ Super Fund 2022 Annual Report (source)

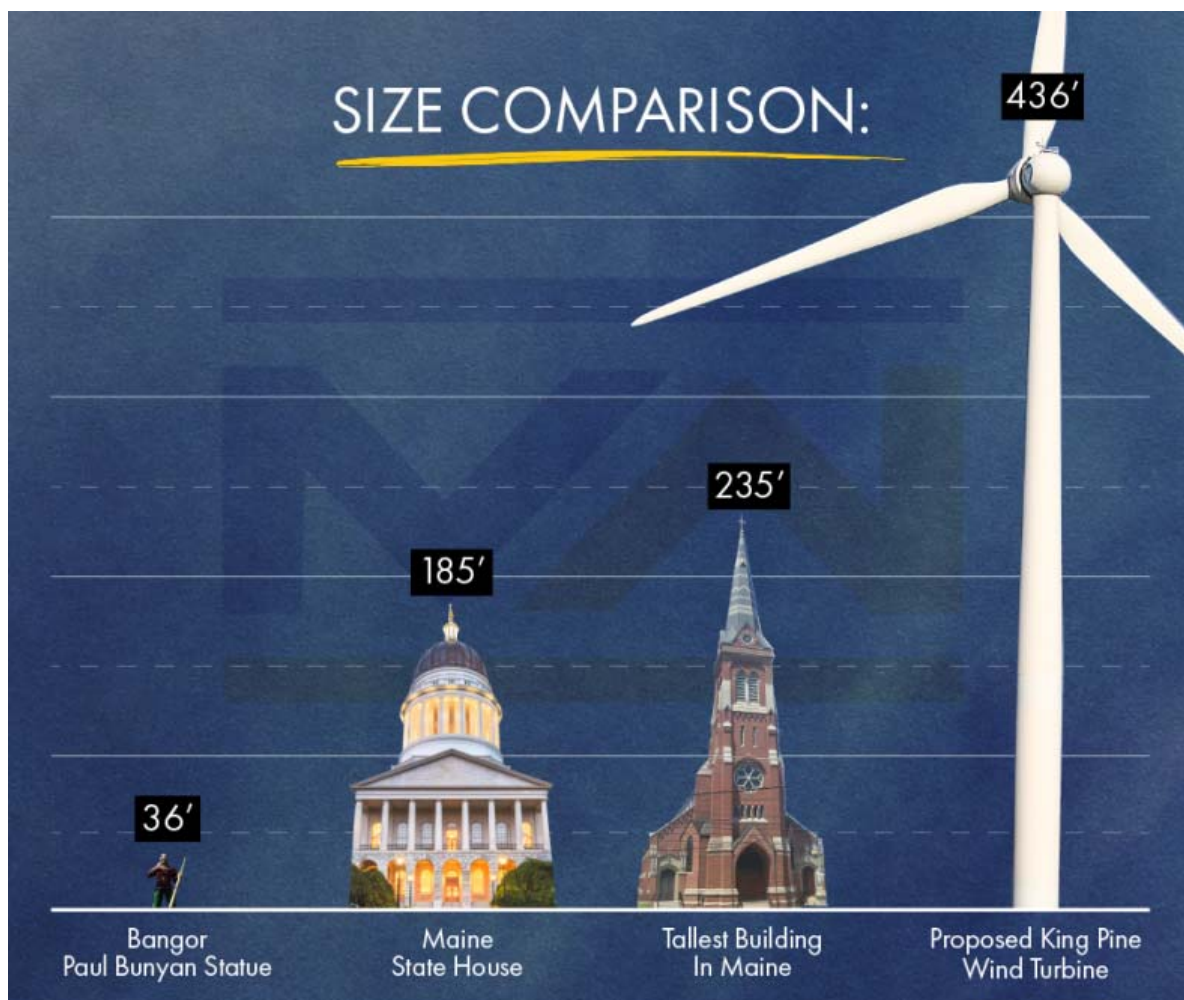
If completed, King Pine Wind would be the largest onshore wind facility in the state of Maine, more than doubling the total megawatt capacity of every other wind power installation operating in the state combined.

Indeed, the proposed wind farm is the largest of its kind east of the

## Mississippi.

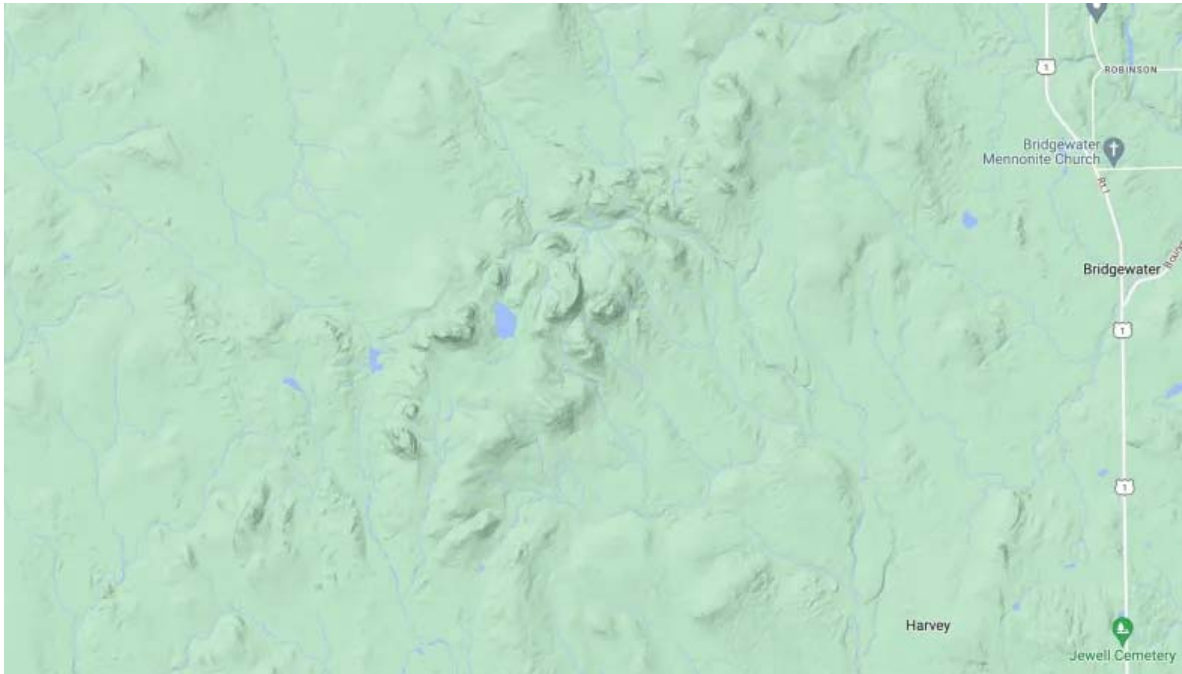
According to Longroad, the project's towers will stud hilltops in a 4,500 acre region that runs through Aroostook County northwest of Houlton.

Although Longroad hasn't selected towers and turbines yet, the company says the tower heights will be 492 ft-535 ft tall, easily making them the largest wind turbines in Maine and the tallest structures in the state.



Unlike some turbines operating in Maine, Longroad plans to limit the night time visibility of the towers by attaching radar-based warning systems that will only activate red blinking beacons when aircraft are nearby, such as when airplanes are landing at the nearby Presque Isle International Airport.

Longroad's prospective tower base sites range from elevations of 770 ft to 1260 ft. The company hasn't said how far away the towers will be visible from during the day or when the beacons are flashing at night.



A topographical map of the area where the proposed wind turbine installation will be centered, according to Longroad Energy. Longroad Energy has stated the installation will be “centered in and around Webbertown Township, west/northwest of Houlton, generally north of I-95 between Route 1 and Route 11” (Map Source: Google Maps)


According to a [2020 financial audit](#) submitted to the state of Maine, King Pine would be Longroad's largest wind power project to date.

As of that audit, the company's largest planned wind power operation was El Campo Wind, LLC, a 242.8 megawatt installation in Knox County, Texas.

Longroad's management has several veteran wind industry alums from First Wind, a Boston-based company that has successfully

completed several wind power projects in Maine.

First Wind built and operated wind farms from Hawaii to Maine with a total capacity of 1,300 megawatts before it was acquired in 2014 by SunEdison.

Longroad's promotional materials for King Pine claim the project will spend \$425 million of a total \$2 billion in project expenditures with Maine vendors and generate \$60 million in property taxes. 

The company anticipates 30 full-time jobs will be needed after the turbines are in operation.

Although Maine-based contractors and sub-contractors may stand to gain from the initial construction of the sprawling wind farm, the law authorizing the project would not preclude the hiring of workers from out-of-state or nearby Canada.

Nor would it force the developers to prioritize Maine workers, as the recently passed wind power port construction bill did.

Another uncertainty about the project: the Power Purchase Agreement (PPA) between Longroad and Maine's utility companies, Central Maine Power (CMP) and Versant.

That agreement will dictate the price Maine's utilities must pay for the wind-generated electricity — and therefore the price Maine ratepayers pay for their electricity.

However, under the Maine Public Utility Commission's rules, those details have been withheld from the public and even lawmakers.

The term sheet Longroad submitted to regulators is heavily redacted in the public version.

King Pine Wind Pricing – Escalating Energy Price (Year 1, 2.5%/Yr Escalator; \$/MWh)

Transmission Option	200 MW	400 MW	600 MW	800 MW	1000 MW
1	\$				

**ADDENDUM 2**

King Pine Wind Pricing – Flat Energy Price (\$/MWh)

Transmission Option	200 MW	400 MW	600 MW	800 MW	1000 MW
1	\$				

**Foreign Influence on Maine Electricity**

The foreign ownership of Longroad means most of the profits earned on the sale of King Pine’s “green” electricity and related Renewable Energy Credits (RECs) will flow out of the U.S.



These investors will fund the initial development of the project and recoup their investment as wind-generated electricity is sold to New England ratepayers.

Longroad's investors will also earn returns on the RECs sold to American firms, primarily in Massachusetts, which are required by law to purchase the carbon offsets.

Longroad has made no attempt to conceal that its major investors are foreign companies and a foreign government.

In 2022, the company touted MEAG's investment in a [press release](#).

"We are thrilled to have MEAG join with our existing investors to power our robust growth plans, and we appreciate their collective support as we make strides in implementing our ambitious near-term objectives," said Longroad CEO Paul Gaynor.

MEAG, Infratil, and NZ Super Fund execs similar echoed the enthusiastic sentiment, with NZ Super Fund's Del Hart stating, "Longroad has been one of the NZ Super Fund's most successful investments and, in line with our long-term, partnership approach to infrastructure development, we are pleased to both welcome MEAG as a co-investor and contribute more capital ourselves."

Non-U.S. firms funding Longroad also have a significant presence on the company's [board](#).

NZ Super Fund's Head of Portfolio Investments George Crosby, Infratil's Chief Executive Jason Boyes, and MEAG executive Alex Poll all have seats on Longroad's [board](#), as does Kellee Clark, a partner at the NZ-based firm that manages Infratil.

But Longroad's foreign ownership hasn't been front and center as

residents of northern Maine have debated the controversial project and, more broadly, the subject of foreign influence in Maine's politics and energy markets.

An Aug. 15 [story](#) in the Bangor Daily News covering the controversial aspects of the project, for example, never touched on the big money behind the wind power scheme, even though those foreign firms stand to reap the lion's share of profits over the 20-25 year lifespan of the project.

Those profits will come directly from Maine ratepayers thanks to a state-approved agreement that will require Maine's utilities to buy King Pine's power — agreements that have been withheld from the public.

## **Aroostook Corridor: The LS Power Transmission Line**

In October, the Maine Public Utilities Commission (MPUC) gave initial approval for Longroad Energy's ~\$2 billion wind farm, which will be largely built on timberlands owned by the Canada-based JD Irving, Maine's largest landowner.

At the same time, the commission selected the New York-based LS Power (operating in Maine as LS Power Grid Maine, LLC) to construct a \$2.9 billion high-voltage 1,200 megawatt transmission line that will allow King Pine's electricity to enter New England's.

(Note: The \$2.9 billion figure is based on an MPUC estimate of the total cost to ratepayers over 30 years for the construction and operation of the transmission line. The upfront capital expenditure of the transmission line and substations will be less than \$1 billion, according to LS Power.)


Without that transmission line to connect to ISO-New England, the King Pine project would not be feasible.

The commission also made final approval of the project contingent upon an agreement with the Commonwealth of Massachusetts to share in the costs of the wind farm and the transmission line.

In December, the Massachusetts Department of Energy Resources [approved](#) a deal that will have the Commonwealth purchase 40 percent of King Pine's eventual output and pay 40 percent of the transmission line costs.

A month later, the MPUC approved both projects, determining that they were in the public's interest.

"These projects will provide significant benefits to Maine and the region, including jobs during construction, property tax revenue for local communities, and environmental benefits from new renewable energy displacing fossil fuels," said MPUC Chairman Philip Bartlett, the former chair of the Maine Democratic Party.

Both projects stemmed from a 2021 [Maine law](#) that created the Northern Maine Renewable Energy Development Program. 

That law created a number of requirements for potential bidders on the projects, but it did not contain requirement that eligible firms prioritize the hiring of Maine workers or that they be primarily owned by U.S. investors.

LS Power, as a privately held company, is not required to disclose investors.

However, in 2018 the company launched an equity fundraise through an affiliated fund that targeted investors in the Middle East and Asia, according to an LS Power [press release](#).

Four years earlier, the company conducted a fundraiser that [targeted](#) “U.S. and European public and private pension plans, insurance companies, corporations, not-for-profit organizations, endowments, foundations, family offices, and Asian and Middle Eastern sovereign wealth funds.”

The extent of sovereign wealth fund investment in LS Power, if any, is unclear.

The proposed transmission line in northern Maine would be the LS Power’s second energy project in Maine, their first being Kibby Wind Power in Franklin County, which is operated by subsidiary REV Renewables.

LS Power has attracted criticism from northern Maine landowners who claim the potential path of the transmission line will disrupt farmland, impose on wildlife, and involve drilling that could expose water aquifers to PFAS contamination.

But most of the criticism has revolved around precisely where the transmission will run, and on who’s property.

The company has held meetings across the state to persuade local land owners of the project’s benefits, but [public comments](#) registered with the MPUC have been overwhelmingly opposed to the project.

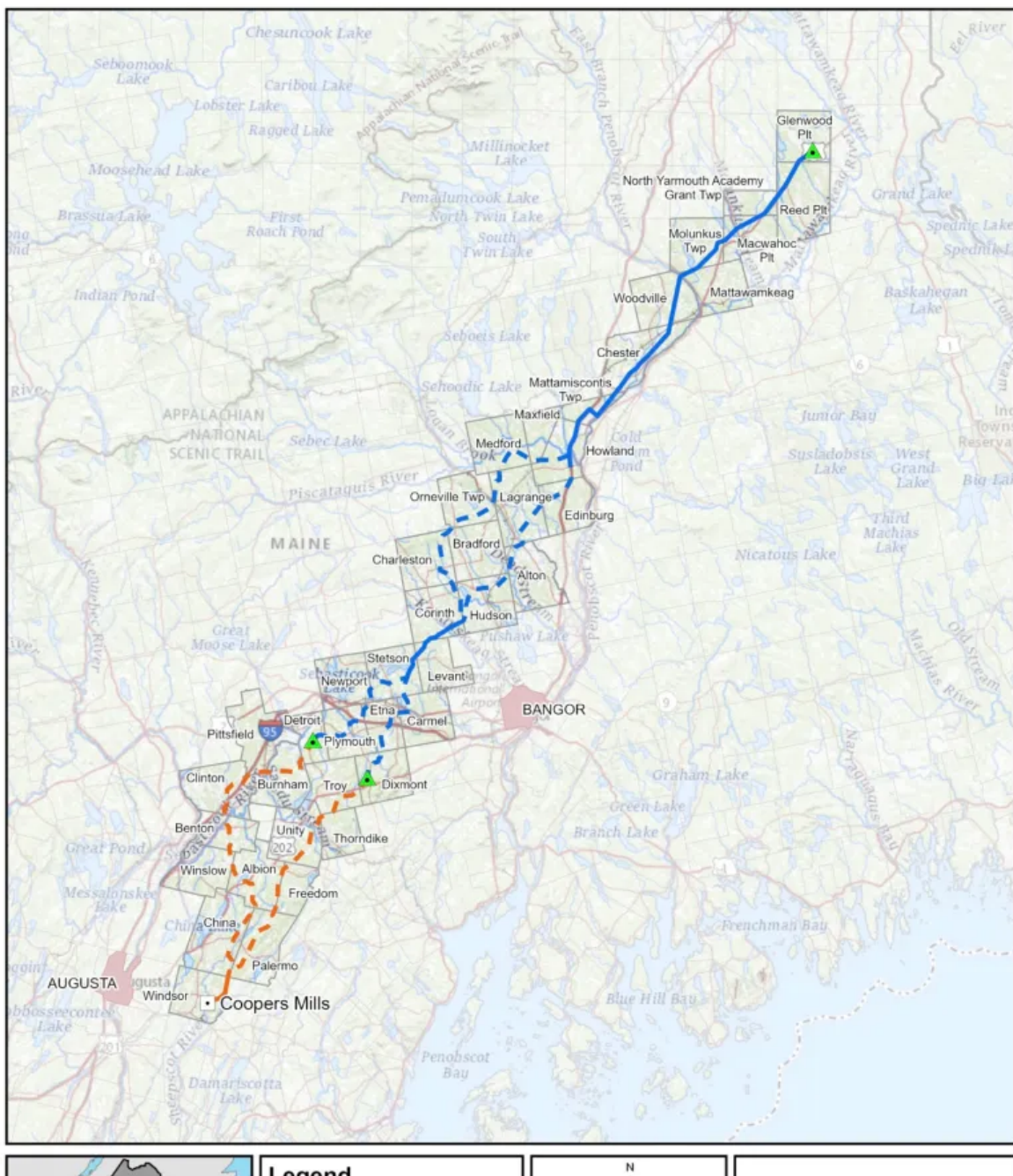
Rep. Steve Foster (R-Dexter), the House Republican lead on the Energy, Utilities, and Technology (EUT) Committee opposed the approval of the corridor, citing a lack of information about the cost of the project and the eventual route.

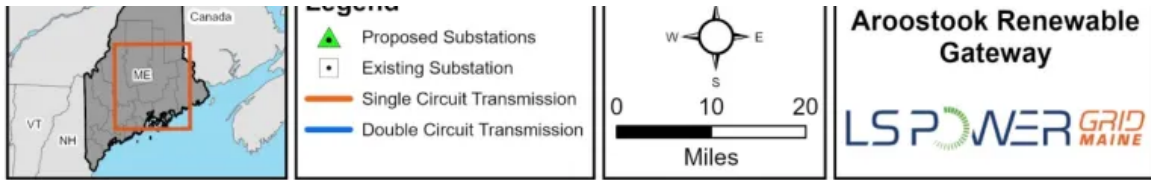
“Much of the information regarding the Aroostook Corridor was not available at the time it received Legislative approval, including any

potential route,” Foster said.

“Several legislators who opposed that approval and who represent towns and land owners along the recently proposed route are working with local citizen groups to find more acceptable options,” said Foster.

The company has posted a map with a theoretical route that the transmission line could take, stretching from Glenwood Plantation down to Coopers Mills, east of Augusta.





In a written statement, LS Power’s Vice President of Development Doug Mulvey said that the company currently has no updates on the proposed route for the transmission line to disclose.

LS Power will get paid on the transmission line under a Transmission Agreement (TA) which, like King Pine’s PPA, is also not available for inspection by the public or lawmakers.

The version of the [term sheet](#) available to the public and lawmakers is redacted.

<p>Proposed Pricing</p>	<p><b>Base Option:</b></p> <ul style="list-style-type: none"> <li>• Price at COD: █████/kW-month</li> <li>• Capacity: 1,200 MW</li> <li>• Annual Escalation: 1%</li> </ul> <p><b>Base and Northern Segment Option:</b></p> <ul style="list-style-type: none"> <li>• Price at COD: \$█████/kW-month</li> <li>• Capacity: 1,200 MW</li> <li>• Annual Escalation: 1%</li> </ul> <p>If LS Power does not construct, own, or have any cost responsibility for one or more of the components of the Proposed Interconnection Facilities, then the Price at COD will be reduced for each as shown below:</p> <ul style="list-style-type: none"> <li>• \$█████/kW-month for exclusion of the single-circuit 345 kV transmission line between Pittsfield Substation and Coopers Mills Substation</li> <li>• \$█████/kW-month for exclusion of the single-circuit 345 kV transmission line between Coopers Mills Substation and Maine Yankee Substation</li> <li>• \$█████/kW-month for exclusion of the Coopers Mills STATCOM</li> </ul> <p>Payments for transmission service will begin when construction of those portions of the Project that are within LS Power’s scope and under LS Power’s control to complete are complete and capable of transmitting power (COD). The proposed annual escalation factor</p>
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will apply beginning at the one-year anniversary of COD.

By way of example, if the Commission were to select the Base and Northern Segment Option, the monthly contract payment during the Contract Year immediately following COD would be \$ [REDACTED] (\$ [REDACTED] times 1,200,000 kW). The monthly contract payment during the second Contract Year following COD

Mulvey said that the company sees benefits in making the TA and PPA pricing agreements public, but that it's not their decision to make.

"The redacted pricing in the publicly available term sheet filed with the PUC will become fully public when the PUC decides the pricing is no longer confidential," Mulvey said.

"The LS Power and Long Road pricing was kept confidential because the companies were asked to continue marketing capacity to other potential off takers," Mulvey said.

Regardless of MPUC's reasoning for keeping the pricing agreements from the public and from lawmakers, the end result is that lawmakers voted to approve the project without a key piece of information that would help them determine the projects' impact on electricity rates in Maine.

## Will King Pine Wind Reduce Energy Prices?

Although backers of the project have claimed that King Pine will reduce electricity prices in Maine, the agreements that would allow lawmakers and members of the public to evaluate those claims remain undisclosed.


Those agreements are critical to understanding the financial obligations state lawmakers and the MPUC are placing on CMP,


Versant, and Maine's ratepayers.

CMP and Versant will be required by law to purchase power from King Pine and to pay LS Power for transmission costs for at least 25 years, and those costs will be passed along to Mainers through electricity bills.


CMP and Versant will collect those payments, but they will not profit from the projects themselves.

Representatives from CMP and Versant declined to comment for this story.

Lawmakers and Maine residents have been asked instead to rely on predictions from Daymark Energy Advisors. 

Daymark concluded in that the project will reduce electricity costs for Mainers in a 22-page report paid for by Longroad and LS Power. 

In addition to the pricing agreements, much of the proprietary information and modeling used to reach the conclusion that the ambitious project will benefit Mainers is also confidential and not available to members of the public.

In other words, no one is allowed to see the power purchase agreement, the transmission agreement, or the underlying details of the only study that shows the benefits of the project for ratepayers. 

That means the true cost of the power the wind turbines will generate — and therefore the actual impact on Mainer's electricity bills — is unknown not only to the lawmakers who voted on the plan, but also to the citizens of Maine who will be picking up the tab.




## King Pine, LS Power, & Question 2

The foreign ownership of the developers proposing to build Maine's largest wind farm is especially newsworthy considering the ongoing debate over the foreign ownership of Maine's two largest utility companies.

CMP and Versant are owned, respectively, by the Spain-based Iberdrola and the Canada-based ENMAX Corp.

ENMAX Corp. is owned by the city of Calgary, Alberta, while Iberdrola's largest investor is the Qatar Investment Authority, a sovereign wealth fund controlled by the Qatari government.

This fall, Maine voters will either approve or reject a ballot referendum (Question Two) that asks: "Do you want to ban foreign governments and entities that they own, control, or influence from making campaign contributions or financing communications for or against candidates or ballot questions?" 

While the question is largely seen as an attempt to block CMP and Versant from lobbying Maine officials or spending money to defend their interests, next to no attention has been paid to King Pine, which is 40 percent owned by the New Zealand sovereign wealth fund.

In recent years, Longroad Energy and LS Power, have lobbied lawmakers extensively and contributed modest amounts to political action committees for the purpose of influencing State House politics in a favorable direction.

LS Power enlisted the services of top green energy lobbyists Jeremy Payne and Anthony Buxton to cajole lawmakers in the 131st Legislature on a bill sponsored by Senate President Troy

**Jackson** (D-Allagash).

The bill (LD 924) was a **resolve**, signed by the governor in June, that would provide legislative approval to the transmission line that is vital to King Pine's viability.

**Buxton** is a partner at Preti Flaherty, one of the largest lobbying firms in Maine. Payne is a veteran green energy lobbyist with Cornerstone Government Affairs.

**Doug Mulvey**, of LS Power, also reported lobbying activity related to Jackson's bill.


According to state lobbying records, Payne received \$21,000 for his services this year in relation to LD 924, while Mulvey and Buxton received, respectively, \$3,733 and \$4,592.

LS Power's lobbyists have met this summer privately with lawmakers — in separate meetings with Democrats and Republicans — in order to address their concerns about the project.

The ballot referendum banning foreign influence, if passed, will almost certainly face legal challenges.

However, it's an open question as to whether King Pine's owners would be allowed to influence Maine politics if the question prevails.

Whether the prohibition would apply to LS Power is even murkier.

Although LS Power's transmission line and Longroad's wind farm are mutually dependent on one another and they share a common interest in seeing certain legislation pass, they have no formal partnership. 

## Daymark: “Trust us, this is good for Mainers”

The suggestion that the King Pine project and the Aroostook Corridor will reduce Mainer’s electricity prices comes from a 22-page study paid for by Longroad Energy and LS Power, the two firms with the most to benefit from convincing politicians, ratepayers, and regulators that the plan is a good idea.

The study was conducted by [Daymark Energy Advisors](#), a Worcester, Mass.-based consulting firm.

The document has been the key tool of persuasion lobbyists and backers of the project have used when advocating for its approval.

Daymark’s assignment was to conduct a cost-benefit analysis of the project from 2028 to 2053, a task that is akin to trying to predict the future.

Adding to the uncertainty of the task is the future cost of competing energy sources and the auction price of Renewable Energy Credits (RECs), both of which could vary wildly before the project is supposed to become operational, and at any time after it begins producing energy. While the transmission line is supposed to be operating by 2029, the wind farm is projected to be fully operational by 2031.


In order to address that uncertainty, the consultants had to make a number of assumptions about how New England energy markets and energy policy will develop over the next two-three decades.

One of those assumptions was that the price of natural gas will increase two to three times from current levels.

“Alternative long-term pricing scenarios were not evaluated in this study,” the authors wrote, “but in general higher natural gas prices

increase the net benefits of inframarginal resources such as the Project.”


In other words, the benefits of King Pine for Maine depend largely on the expectation that natural gas prices will surge in the future. If natural gas prices remain flat or decrease, then the cost of power from King Pine could exceed the cost of alternative sources.

That means the prediction that King Pine will provide lower cost electricity to Mainers only holds true in a future scenario where electricity prices from Maine’s current primary sources increase well beyond their already-high current levels. 

Even if you assume that the assumptions in the Daymark study are accurate, the benefits to Mainers are modest.

The consultants project that the project will provide a cumulative net present value to Maine of \$887 million over a 25-year period.

That is, \$35,480,000 per year from 2029 to 2053.

Put differently, every Mainer will see about \$27 worth of benefit per year under the projections of the firm that was hired by the project developers. 

The following table is Daymark’s take on hypothetical benefit scenarios for residential versus commercial customers.

<b>CUSTOMER</b>	<b>MONTHLY USAGE (KWH)</b>	<b>AVERAGE MONTHLY BILL SAVINGS (2023\$)</b>
Residential	500	\$2.33
Small Commercial	1,000	\$4.66
Medium Commercial	5,000	\$23.31
Large Commercial/Industrial	1,008,000	\$4,699.35

**Table 4. Summary of 25-year rate impact**

Source: Daymark Energy Advisors

A spokesperson for Daymark declined to comment on their study.

“The Daymark study is based on hypotheticals, because the economics of wind power do not allow for real ratepayer reductions,” said Rep. Reagan Paul (R-Winterport), a member of the EUT Committee.

“Subsidies, RECs, and other market manipulations are the only way wind power can even pretend to be competitive,” said Paul.

Consultancy predictions aside, Maine ratepayers still will have no idea what the costs to CMP and Versant — and therefore to ratepayers — will be under the agreements that will govern the life of the project.

Yet the Legislature and the MPUC have already selected, approved, and endorsed the project and its developers — all with only a guess as to whether it will raise electricity costs in Maine.

Despite Maine’s large taxpayer-subsidized investments in wind power over the past two decades and general political enthusiasm for wind power, electricity prices in Maine remain some of the highest in the country.

Rate [history records](#) show that CMP and Versant, the utilities that are forced by law to purchase wind power, have increased rates steadily over the past decade. Although both companies have and continue to earn substantial profits, often times their rate increases are driven by mandates from the State Legislature or the MPUC, such as Net Energy Billing.

Rates spiked in 2022 even has an unprecedented number of renewable energy projects, mostly community solar, came online

in Maine.

In 2021, the U.S. Energy Information Administration ranked Maine as having the 11th most expensive electricity in the country.

Will King Pine finally buck the more than decade-long trend of green energy projects promising low cost electricity only to increase rates for Mainers?

Paul thinks not.

“For every piece of energy legislation that Maine passes, ratepayer costs go up,” Paul said.

“If bills like [1710](#) and 924 continue to pass, the current standard offer rate of 28 cents will seem like a dream,” she said.

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