

**STATE OF MAINE
PUBLIC UTILITIES COMMISSION**

MAINE PUBLIC UTILITIES COMMISSION
INQUIRY INTO THE PROCESS TO
IDENTIFY PRIORITIES FOR GRID PLAN
FILINGS

Docket No. 2022-00290

**JOINT REPLY COMMENTS OF
ACADIA CENTER,
CONSERVATION LAW
FOUNDATION, MAINE
CONSERVATION VOTERS,
NATURAL RESOURCES
COUNCIL OF MAINE, THE
NATURE CONSERVANCY IN
MAINE, AND THE UNION OF
CONCERNED SCIENTISTS**

October 17, 2022

On September 12, 2022, the Public Utilities Commission (Commission) initiated a Notice of Inquiry (NOI) to “obtain input from stakeholders on the process to identify priorities to be addressed in a filing by investor-owned transmission and distribution utilities regarding a grid plan and how best to encourage participation, especially from stakeholders that do not frequently participate in Commission proceedings.” The Commission requested comments be filed by October 3, 2022, and reply comments be filed by October 17, 2022. The Natural Resources Council of Maine, Acadia Center, Union of Concerned Scientists, Conservation Law Foundation, Maine Conservation Voters, and The Nature Conservancy in Maine appreciate the opportunity to provide input into the Commission’s process and respectfully submit for the Commission’s consideration these comments in response to the comments of others.

We are generally supportive of what commenters are proposing. We support having multiple planning stages with ample opportunity for public comment within each stage, generally consistent with what both Versant Power (Versant) and the Coalition for Community Solar Access/Maine Renewable Energy Association (CCSA/MREA) are recommending. We agree

with CCSA/MREA that the “Jade roadmap process” developed by the NARUC-NASEO task force provides a helpful framework. Opportunities for public comment should include, among others, an opportunity at the conclusion of the stakeholder process to provide feedback on a draft of the planning order that the Commission will issue to utilities, an idea mentioned in comments by Central Maine Power (CMP). Reiterating our recommendation, the Commission should also issue a straw proposal to solicit feedback on its plans for stakeholder engagement.

Among other welcome ideas to broaden outreach and public engagement, we support CCSA/MREA’s suggestion to utilize informal written comments to help overcome institutional barriers and balance opinions of those who speak up most in working group meetings. In contrast, it bears noting that CMP’s recommendation for how the Commission might enhance participation is wholly inadequate. Providing notification to parties from prior proceedings, issuing a press release, and potentially publishing a notice in newspapers represents the bare minimum. Business as usual will not suffice for bringing new voices to the table.

We are encouraged by Versant’s thoughtful and proactive work in developing its three-stage proposal, which includes a top-line emphasis on engagement with communities and energy stakeholders and a willingness to invite “stakeholder solutions” outside of utility-owned assets. We hope Versant will continue to develop and apply this approach with the Commission’s support. Specifically, we think Versant’s suggestion to survey customers and communities early in the process to help identify and evaluate priorities merits consideration by the Commission. We agree with the importance of identifying and clarifying critical assumptions as early as possible, including through cataloging and integrating relevant data, goals, projections from the Maine Climate Council, the Governor’s Energy Office, Efficiency Maine Trust, and national subject matter experts, among other existing sources.

We also support Versant's suggestion that "each priority [be] clear and measurable and [specify] how an Integrated System Plan can support each objective." Designing utility plans to achieve measurable objectives will be critical, especially in serving the Commission and stakeholders in monitoring implementation. Measurable objectives can be reinforced with regular reporting requirements to help hold utilities accountable to the plans and strengthen continuity across rate cases and other dockets at the Commission. This speaks to comments by the Office of Public Advocate (OPA) on the importance of tying planning to implementation, including by recognizing the functional limitations of utility systems and the necessary preliminary tasks to save time and money in rolling out technologies and operational changes for grid modernization. These concerns are consistent with comments we have made to the effect that the planning requirements must be sequenced carefully according to a clear timetable to avoid delaying existing commitments and to maintain momentum in areas of existing work (i.e., grid modernization recommendations, CMP's forthcoming hosting capacity maps, improvements to the distributed energy resource (DER) interconnection process, non-wires alternatives (NWA) data collection enhancements, etc.), while laying a foundation for accommodating additional and emerging areas that become important in the future.

With respect to Question 6 regarding Electric Power Engineers (EPE) and the grid modernization roadmaps, we support comments by CCS/MREA, OPA, and Versant that this work be carried forward as a valuable starting point in establishing objectives for grid planning. However, we encourage the Commission to consider EPE's work to be one of many foundational elements to be incorporated into Maine's holistic grid planning effort in the early stages.

In identifying consultants and expert witnesses to participate in the proceedings, whether for facilitation, as national subject matter experts, or to provide technical counterweight to vet

the information put forth by utilities at the working group level, we encourage the Commission to cast a wide net in soliciting input, to help bring insight from a diversity of entities around the country to bear in Maine's effort.

In our comments from October 3, 2022, we recommended that the Commission establish a stakeholder council as a standing body to provide oversight in monitoring and evaluating implementation of the utilities' plans. As we envision it, this body would not disband once the plans are finalized but play a crucial role in receiving regular updates from utilities, monitoring progress, troubleshooting implementation, and establishing continuity across dockets, agencies, and working groups, including during the five-year interim periods between planning processes. The concept is not dissimilar to the grid modernization advisory council established by Massachusetts' new climate law, Senate Bill 9 - *An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy*.¹ If the Commission remains unconvinced as to the value-added of establishing such a body at this stage, then we encourage to Commission to keep the idea in reserve for a later decision and evaluate the possibility over the course of stakeholder engagement, potentially including a related item in its needs assessment report to the Joint Committee on Energy, Utilities, and Technology due December 1, 2022, for instance, if additional statutory authority is deemed necessary.

We appreciate the opportunity to provide our input at this juncture and look forward to supporting the grid planning effort as it gets underway this fall.

Respectfully submitted,

¹ <https://malegislature.gov/Bills/192/S9>

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