

December 30, 2024

Governor's Energy Office  
Via email [geo@maine.gov](mailto:geo@maine.gov)

*Re: Acadia Center Comments on the draft Maine Energy Plan*

To the Governor's Energy Office:

Acadia Center appreciates the opportunity to provide written comments on the draft Maine Energy Plan ("MEP"). Acadia Center is a Rockport, Maine-based nonprofit that plans, advocates for, and seeks implementation of clean energy solutions across New England and Eastern Canada. We appreciate the extensive work done to develop the draft MEP. To meet Maine's ambitious climate and energy goals Maine must deploy clean electricity to achieve economy-wide decarbonization, lessen the energy burden on Mainers, and take prompt action to move away from fossil fuels. Acadia Center applauds many of the measures outlined in the draft MEP, but hopes the GEO finds the following comments helpful.

#### **Maine Must Focus on Gross GHG Reduction to Meet Its Climate Goals**

The draft MEP recites that Maine is 75% of the way toward achieving carbon neutrality and that currently Maine has reduced GHG by 25% below 1990 levels (as of 2019 GHG inventory). However, these measurements "net out" existing and increasing GHG emissions in Maine with the immense carbon sequestration provided by Maine's forests. To meet its goals, Maine should maintain its focus on the statutorily required 80% reduction in gross GHG below 1990 levels by 2050.

#### **Remove Obstacles to Solar and Wind Implementation in Maine and Expand Battery Storage**

Solar is a proven technology with decreasing costs that presently encounters disappointing delays in interconnection. Maine should continue programs like "Solar for All" that allow low-income Mainers to reap the benefits of solar power. Also, solar DERs should be implemented faster and less expensively by the utilities. Solar should not be a peripheral source, relegated to dealing with peaks, but should be central to Maine's energy future. In addition, Acadia Center has been active in promoting Maine's offshore wind resources and as the draft MEP emphatically notes, Maine's offshore wind resources must be implemented with a goal of at least 3,000 MW of clean wind power. Maine must also continue to expand its battery storage capacity, including long duration battery storage. Without widespread battery storage implementation, there can be no meaningful adoption of wind, water, and solar renewables at scale. Maine has made real progress recently, including installing two substantial battery storage facilities, and it must continue to implement battery storage apace. Moreover, Mainers need help in purchasing batteries for rooftop solar, now.

#### **Continue Advocacy and Support for EV Adoption in Maine and for Charging Infrastructure**

Mainers should be able to take advantage of the cost savings, convenience, and lowered emissions that EVs offer. The draft MEP correctly notes that the majority of Maine's GHG emissions come from transportation, and Maine has taken meaningful steps toward promoting EVs. However, much needs to be done to realize the GHG reduction potential of EVs. The EV market has evolved and now has affordable EVs with an impressive range that can operate efficiently in all weather. Increased State support at all levels will be critical to the widespread adoption of EVs in Maine. Moreover, Maine has made strides toward expanding fast charging, but as many EV owners know, they use home charging 99% of the time. Financial support for installing Level 2 chargers in homes, apartment buildings and businesses is critical.

## **The Draft MEP Highlights the Central Role of the Grid in Unlocking Maine's Clean Energy Future**

The draft MEP highlights numerous areas that demonstrate how centrally important transmission and distribution grids will be for Maine's energy future. Acadia Center agrees that Maine must "coordinate with neighboring jurisdictions to implement cost-effective energy procurements that benefit Maine ratepayers, including Northern Maine Renewables . . .", draft MEP, p. 38. This is true both for the transmission and distribution grids in Maine as well as for how those grids operate as a part of a much larger functional grid across ISO-NE and the Northeast Power Coordinating Council (NPCC). Acadia Center strongly endorses the draft MEP's stated need to situate Maine planning with the regional and interregional context and encourages further action. Acadia Center also agrees with the importance of upgrading and expanding the capacity of the grid in Maine, including cost-effective transmission and the use of grid enhancing technologies (GETs). Electrification and the growing demand for renewables will require that renewable energy be moveable from where it is generated to where it is needed, including home-grown renewable energy that benefits Mainers.

## **Pathways Reliant on 'Clean Fuels' Face Significant Levels of Risk from Multiple Angles**

Some of the aspects of the draft MEP suggest scenarios such as renewable natural gas (RNG), biomass, hydrogen clean thermal, and hybrid heat that are not likely to provide meaningful, efficient reductions of emissions in the next decade. All these strategies require to some extent the development and implementation of unproven, complex, and expensive solutions, and none has been demonstrated to lower energy costs. In addition, their environmental benefits are currently unproven, making emissions reduction estimates unduly speculative. By way of example, hybrid heat, which would use heating fuels to mitigate peak loads, will require (as recognized in the draft Technical Report) increased customer equipment costs, changes in customer behavior and a greater supply of both synthetic fuels and biofuels. Recent Climate Council discussions have highlighted these concerns. As outlined in the Acadia Center comments to the draft technical report, these fuels are not going to provide any short-term relief to one of the pressing problems noted in the draft MEP—that Mainers are struggling to pay their energy bills. Moreover, the use of nuclear energy has already proven too expensive, and many decades after nuclear power was implemented, there simply is no long-term storage for nuclear waste currently available.

## **Natural Gas is a Price Volatile Fossil Fuel That Will Continue to Expose Struggling Mainers to High Electricity Costs and a Future of Gas Proceeding in Maine Is Indicated**

The draft MEP catalogs the economic and environmental costs of natural gas. While natural gas has served as a transition fuel for a limited number of Maine customers, using natural gas in the future will only subject Mainers to the uncertainties of natural gas price volatility and environmental pollution. The Pathways report predicts pipeline gas use will decrease dramatically, as much as 90% over the next 25 years and as the Pathways report explains "Gas rates may increase, perhaps dramatically, as the largely fixed costs of the gas system are spread across fewer customers and lower gas volumes." , p.26. Moreover, when this occurs gas utilities will seek to have their customers pay for the "stranded costs" of building and operating the gas system. Maine does not presently have extensive gas pipelines, so the opportunity to address these problems is now, when it can be done responsibly. "Future of Gas" proceedings should be pursued in Maine, as they are in at least twelve other states.

Sincerely,

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