

NEB Subcommittee:

Please find below the ideas MREA offered up at last week's meeting, and referenced again during today's meeting.

We hope this is helpful, and would be glad to discuss.

Thank you.

Jeremy

- Safe harbor in NEB 1.0 1,500MW total -- 1,250MW solar only, and 250MW of solar + storage (consistent w/ Senator Lawrence's priority of pairing solar w/ batteries);
- Recognize that companies have made real and meaningful investments through Interconnection Application submissions, and have also made real investments through NEB agreements and customer acquisition. And that whether you all choose to use the Interconnection Services Agreement or NEB agreements that real MW, customer savings, jobs, etc will be negatively impacted even at the 1,500MW figure;
- MREA is not taking a position whether the Interconnection Services Agreement or NEB agreement is the appropriate metric;
- In order to provide clear evidence of likely attrition -- on top of interconnection challenges, state or municipal permitting, any many other potential issues -- include consideration of project milestones that must be achieved in order to remain safe harbored in 1.0 -- e.g. reaching commercial operation by 12/31/24, and securing municipal permits by 12/31/21;
- Allow for "good cause exemptions" whereby companies would petition the PUC that 'but for the following circumstances out of our control, our project would have qualified for safe harboring,' and the Commission would then issue its ruling as to whether a project is in or out;
- Instruct the GEO to convene a stakeholder group this summer to examine and create recommendations for a NEB 2.0 successor program. Those discussions should be governed by the aim of securing 250MW/year for 5 years beginning in 2024 with declining compensation in successive years based upon market factors (including, but not limited to, the C&I tariff rate), identify the appropriate incentives to ensure project diversity, and other details around ratemaking and changes that would help reduce programmatic costs (e.g. DG projects are treated as load reducers); and
- Industry is aware there are cost sensitivities around this program and we are aiming to be responsive and to bring forward meaningful concessions, which we believe the prior bullets represent.

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