



Conservation
Law Foundation

For a thriving New England

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submitted electronically

re: Request for Information on Efficiency Maine Trust (Trust) Triennial Plan VI (Fiscal Years 2026-2028)

Dear Mr. Turner:

Thank you for the opportunity to provide preliminary comments on the Efficiency Maine Trust's Request for Information on Triennial Plan VI (Fiscal Year 2026-2028).

Conservation Law Foundation (CLF) is a nonprofit, member-supported, regional environmental organization working to conserve natural resources, protect public health, and promote thriving communities. CLF protects New England's environment for the benefit of all people. We use the law, science, and the market to create solutions that preserve our natural resources, build healthy communities, and sustain a vibrant economy. CLF works to equitably tackle climate change by advocating in favor of increased and widely accessible energy efficiency and beneficial electrification to reduce greenhouse gas emissions from buildings and transportation.

We appreciate the opportunity to respond to the Request for Information and look forward to the stakeholder meetings and public hearing anticipated during plan development in 2024.

Triennial Plan VI for Fiscal Years 2026-2028 Is Key to the State Achieving its Decarbonization Targets

The Efficiency Maine Trust and this triennial plan play critical roles in Maine's efforts to comply with its mandatory targets of reducing greenhouse gas emissions 45% by 2030 and 80% by 2050.¹ Stakeholders and the Efficiency Maine Trust must bear this statutory objective in mind throughout development of this plan. A quantitative assessment of projected emissions reductions associated with the plan would help facilitate assessment of progress toward these objectives.

CLF notes that this triennial plan is being developed simultaneous to the next Climate Action Plan under 38 M.R.S. § 577. This could complicate things as each set of stakeholders looks to avoid duplication and potentially seeks to compartmentalize planning between the two efforts. It

¹ 38 M.R.S. § 576-A.

is important that the overarching decarbonization objectives do not get lost in the shuffle between these two processes.

3. Public Information and Outreach

The Trust is no doubt familiar with the Maine Climate Council Final Recommendations of the Equity Subcommittee (Mar. 2023). The Procedural Equity section (beginning at p. 82) provides excellent recommendations “to enable meaningful participation in climate-related policy development, planning, and implementation, and to help ensure that priority populations and communities are aware of, and can access, state programs and funding opportunities for climate action.” Many of these suggestions would apply equally to the Trust’s programming and enable the Trust to reach a wider audience—a critical precursor for increasing participation. In general, procedural equity strategies involve thinking creatively and in concert with “members of disadvantaged, low income, rural and frontline communities” to develop community-appropriate approaches to increasing engagement and ultimately, participation.

6. Equity

CLF encourages the Trust to outline in Triennial Plan VI how it intends to implement the recommendations of the Maine Climate Council Equity Subcommittee that fall within the efficiency and beneficial electrification plans’ scope.

CLF also recommends expanding the breadth of Mainers to whom the Trust offers enhanced programming designed to overcome barriers to access. Low-income Mainers are not the only population in Maine demanding a more engaged approach. The Trust should expand its aim to include climate change frontline communities, those disproportionately affected by the climate crisis, which includes tribal nations, new Mainers, people living in poverty and people of color. CLF also encourages the Trust to expand its focus to renters, older people, and those with limited English-proficiency.

To serve these populations, in addition to implementing procedural equity strategies discussed above, the Trust should dedicate investments additional to those prescribed by law for low-income populations and small businesses. We urge the Trust to allocate 40% of program funds, in alignment with federal Justice40 principles, even where not specifically required by federal funding. Moreover, we urge the Trust to update that allocation appropriately if and when the state defines environmental justice and achieves a new understanding of what population of the state warrants priority funding. We are closely following L.D. 1621 this session which would result in the Department of Environmental Protection defining environmental justice.

8. *Electric Vehicle Initiatives*

More is needed in the medium- and heavy-duty (MHD) electrification space, not only to move markets, bring more clean trucks to the state, and help Mainers purchase them; but also to ready state infrastructure for transformation of this sector—and perhaps as importantly, to assure people (including decision-makers) that the transition to MHD electrification will be successful.²

CLF is aware that the state is initiating a Clean Transportation Roadmap for MHD vehicles. It may be too early to tell, but it appears that this Clean Transportation Roadmap would not obviate the value of the plan the Trust outlined in Appendix N to the last triennial plan, to design a program consisting of:

- A comprehensive campaign to raise awareness of benefits, costs, and options;
- Financial incentives to defray the upfront cost differential with a standard ICE model; and
- Supplemental financing through the Clean Energy Accelerator.³

We applaud the Trust’s limited-time electric vehicle (EV) incentives for fleet vehicles and commercial vans, and hope the triennial plan development process will consider assessment of that program and ways to maintain it without undercutting funding for light-duty EVs. We also support the Trust’s initiation of a MHD EV rebate pilot program, as the Trust described in the Appendix N to the last triennial plan. CLF is closely following LD 122 this session which could provide additional funding for this important work, and hope the Trust is also considering federal funding opportunities. If not already involved, the Trust might also consider a joint effort with the MaineDOT whereby the Trust would work with the transit agencies that MaineDOT has assisted to develop transition plans for their fleets.⁴

With respect to light-duty EV rebates, CLF applauds the Trust for offering enhanced incentives for qualified low- and moderate-income Mainers. We hope to see ongoing analysis of free ridership in the “any-income” EV incentives program to inform assessment of when/whether it will be appropriate to discontinue a general rebate program to focus solely on priority market segments (expanded beyond just low- and moderate-income, as discussed above). But while the rebates remain available to all, CLF encourages the Trust to align the program with Justice40 principles, ensuring that 40% of funding goes toward these priority communities. We understand that doing so will likely entail additional efforts to reach and engage members of these

² CLF strongly affirms that the Maine Department of Environmental Protection should adopt the Advanced Clean Trucks regulation this year. Of course, additional investment in and planning for charging and utility infrastructure to support medium- and heavy-duty electrification is key to successful implementation of that rule. But all should be pursued simultaneously to best advance the state toward its decarbonization targets and ensure a successful transition.

³ Triennial Plan V, Appendix N at 8-9.

⁴ Maine Climate Council, Annual Report (Dec. 1, 2023) at 9.



communities, and potentially require tailoring program design to community needs. This is one instance where the procedural equity recommendations of the Maine Climate Council Equity Subcommittee would be helpful to implement.

10. Beneficial Electrification

By definition, beneficial electrification results in less combustion of fossil fuels. Therefore, consistent with our emphasis on the Trust's central role in achieving the mandatory decarbonization targets, we urge a broad consideration of beneficial electrification. We understand that cost-effectiveness is a threshold requirement for inclusion in the Trust's programming. As such, and with an eye to cutting greenhouse gases 45% by 2030, CLF suggests the Trust engage in comprehensive modeling to identify the broadest possible set of beneficial electrification measures.

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Thank you for consideration of these preliminary comments regarding the development of Triennial Plan VI. We look forward to continuing to work with the Trust in the stakeholder meetings, public hearing, and by written comment as those opportunities present.

Sincerely,

/s/ Emily K. Green

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