



For a thriving New England

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September 18, 2019

*via email*

Emily Cushman  
Program Manager  
Efficiency Maine Trust  
168 Capitol Street, Suite 1  
Augusta, ME 04330-6856

Re: Request for Information on Beneficial Electrification Study

Dear Ms. Cushman:

Conservation Law Foundation (CLF) appreciates the opportunity to submit preliminary comments on the Efficiency Maine Trust's (Trust) Request for Information on Beneficial Electrification Study associated with L.D. 1464, *An Act to Support Electrification of Certain Technologies for the Benefit of Maine Consumers, Utility Systems and the Environment*.

Founded in 1966, CLF is a nonprofit, member-supported environmental advocacy organization that works to solve environmental problems threatening the people, natural resources, and communities in Maine and throughout New England. In the face of global climate change, CLF and its members have a significant interest in reducing greenhouse gas emissions from our transportation and heating systems while creating efficiencies in our electricity grid.

Increasingly electrified transportation and heating sectors present both challenges and opportunities for New England's electricity grid, consumers, and environment. If not adequately planned for, the substantial and rapid load growth could stress the system and lead to congestion, high costs for ratepayers and owners of electric vehicles (EVs), increased deployment of peaking resources and associated environmental impacts. However, if properly managed, increased electrification, along with the flexible load and distributed batteries of EVs, offer a host of grid and consumer benefits. CLF applauds the legislature's focus on "beneficial electrification" in L.D. 1464 and the Trust's up-front consideration of the attendant raft of issues. The information gathered through this process and culminating report with recommendations to the Legislature will represent a significant step towards achieving Maine's new statutory decarbonization targets, see 38 M.R.S. § 576-A, among other objectives of beneficial electrification.

CLF commends the Trust for engaging the public as it initiates the study required under L.D. 1464, and looks forward to further opportunities to provide feedback. CLF encourages the Trust to consider soliciting additional public comment as it develops the report, perhaps with more specific questions about particular policy options or preferences as those arise.

As it embarks on this process, the Trust need not start from scratch. In addition to voluminous reports on relevant issues prepared by efficiency and electrification experts around the country, there have also been several investigations touching on similar issues already conducted in other states, including in New England. In the interest of efficiency and expediency, and to facilitate incremental, rather than duplicative analysis, CLF encourages the Trust to take stock of these studies.

CLF refers the Trust to the recently issued report of the Vermont Public Utilities Commission to the Vermont State Legislature: *Promoting the Ownership and Use of Electric Vehicles in the State of Vermont* (June 27, 2019).<sup>1</sup> This report “analyzes barriers to achieving more widespread adoption of EVs in Vermont, as well as ways to eliminate or mitigate those barriers. The barriers identified include, but are not limited to, the price of new electric vehicles, the perceived limited distance that an EV can travel on a single charge, and the limited availability of public charging locations.” *Id.* at 1. Given Vermont’s similar climate and population distribution, this resource should prove instructive.

CLF additionally encourages the Trust to consider the Massachusetts’ Department of Public Utilities’ investigation into electric vehicles and electric vehicle charging, in particular the Order on Department Jurisdiction Over Electric Vehicles, the Role of Distribution Companies in Electric Vehicle Charging and Other Matters.<sup>2</sup> While not every issue addressed is relevant to this proceeding, it offers insight and analysis into issues including the role of utilities in supporting beneficial electrification.

An additional resource from within the region includes the Rhode Island Power Sector Transformation docket, which produced a Report in November, 2017.<sup>3</sup> The report focuses on beneficial electrification with regard to heating and electric vehicles as well as the role of the utility, among other things.

In New Hampshire, the Public Utilities Commission is currently conducting an investigation into grid modernization.<sup>4</sup> That proceeding is ongoing, though comments on topics including strategic electrification policy were due September 6, 2019. A written report shall be filed by mid-October. Another process and report that may contain valuable insight and information, though its objectives are not precisely in line with those here, is Navigator’s Energy Optimization

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<sup>1</sup> <https://legislature.vermont.gov/assets/Legislative-Reports/Electric-vehicles-report-pdfA.pdf>.

<sup>2</sup> <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/9233599>.

<sup>3</sup> [http://www.ripuc.ri.gov/utilityinfo/electric/PST%20Report\\_Nov\\_8.pdf](http://www.ripuc.ri.gov/utilityinfo/electric/PST%20Report_Nov_8.pdf).

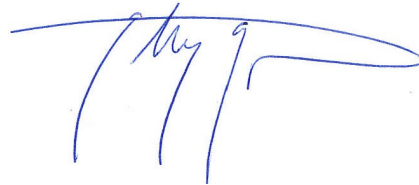
<sup>4</sup> for the docket generally: <https://www.puc.nh.gov/regulatory/Docketbk/2015/15-296.html>; for the relevant order: [https://www.puc.nh.gov/regulatory/Docketbk/2015/15-296/ORDERS/15-296\\_2019-05-29\\_ORDER\\_26254.PDF](https://www.puc.nh.gov/regulatory/Docketbk/2015/15-296/ORDERS/15-296_2019-05-29_ORDER_26254.PDF)

through Fuel Switching Study, prepared for the New Hampshire Evaluation, Measurement and Verification Working Group (Sept. 12, 2019).

CLF hopes that building on studies in similar jurisdictions will support the expeditious development of the report, as dictated by L.D. 1464. It is critical that this study be viewed as a means to an end and that the process, streamlined as it is, culminate in implementable recommendations. The report should be drafted with an eye toward facilitating next steps and ensuring forward progress in the state.

CLF appreciates the opportunity to submit these preliminary comments and looks forward to continued engagement with the Trust as it conducts this important study.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Emily K. Green', with a long horizontal flourish extending to the right.

Emily K. Green, Esq.

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