



Jason N. Rauch, PhD
Energy, Environment, and Regulatory Policy Manager

July 28, 2021

Michelle Turner, Administrative Secretary
Efficiency Maine Trust 168 Capitol Street, Suite 1
Augusta, ME 04330-6856
Via Email: comments@efficiencymaine.com

Subject: Central Maine Power Comments re: Efficiency Maine Trust, Triennial Plan V
(Fiscal Years 2023-2025)

Dear Ms. Turner,

Central Maine Power (“CMP”) respectfully submits the attached comments on the Efficiency Maine Trust (the “Trust”) *Triennial Plan V (Fiscal Years 2023-2025)*.

CMP is a transmission and delivery utility that serves more than 636,000 electricity customers in an 11,000 square-mile service area in central and southern Maine. CMP is a subsidiary of Avangrid, Inc. (“Avangrid”), recognized for safe reliable energy delivery, and a commitment to the community and environment. Avangrid is also a leading sustainable energy company, supports the U.N.’s Sustainable Development Goals and was named among the World’s Most Ethical Companies in 2019 and 2020 by the Ethisphere Institute.

Maine Climate Council’s *Maine Won’t Wait: A Four-Year Climate Action Plan* and the State’s commitment to reduce Maine’s greenhouse gas emissions by 45% by 2030 and 80% by 2050 are essential to the well-being of Maine residents and businesses. CMP commends the Trust’s continued effort to prioritize energy efficiency, weatherization, reducing use of fossil fuels, increasing new jobs and business development to deliver affordable energy and products, enhancing heating improvements, facilitating consumer access to technical assistance and financial incentives and reducing greenhouse gas (“GHG”) emissions.

In the following text, CMP has cited areas and opportunities for collaboration with the Trust that include, yet are not limited to, the sharing and exchange of data, best practices and lessons learned, in addition to areas of coordination in program implementation.

CMP is eager to engage with the Trust and its stakeholders on the many important topics outlined in the Triennial Plan and welcomes the opportunity for future collaboration.

Yours Sincerely,

Jason N. Rauch, PhD
Energy, Environment, Regulatory Policy Manager

2.2.5 Heating Fuels Efficiency and Weatherization Fund

In its efforts to meet the five-year goal established by LD (Legislative Document) 1766 in 2019 to install 100,000 high-performance heat pumps, and align efforts that heat pump purchases constituted an electricity conservation measure, CMP would be available to engage in a working group with other utilities, the Trust and associated stakeholders on ways to share and exchange data around heat pump deployment and installation, specifically towards finding ways to measure and validate the rate at which these investments are exhibiting a measurable conservation of electricity. Understanding customer adoption and utilization of Heat Pumps will ensure more cost-effective grid optimization and capacity planning.

2.2.6 Electric Vehicle (“EV”) Fund and EV Charging Infrastructure Fund

CMP applauds the Trusts commitment to advancing EV adoption across the State of Maine, through LD 614, An Act to Increase Electric Vehicles in Maine, and continues to support the Trusts programs and efforts towards incentives that support the purchase of EVs in the state. As such, CMP through its parent company Avangrid, has made aggressive commitments to transition our fleet to 60% cleaner energy, where this includes 100% of our light-duty fleet. Through its approved and implemented EV charging make ready and managed charging programs, across our companies in New York and Connecticut, Avangrid has experienced the importance of aligning and making available incentives for both vehicles and charging infrastructure as crucial to successful, increased EV adoption. The opportunity for the Trust to leverage Volkswagen (“VW”) settlement funds and other New England Clean Energy Connect (“NECEC”) settlement funds to drive EV adoption will continue to be a central element through 2025. CMP is committed to finding opportunities to collaborate with the Trust to leverage CMP’s internal resources, and our broader Avangrid experience that may assist the Trust in effectively allocating dollars. Additionally, CMP seeks continued collaboration on the utilities role in advancing this important sector for Mainers through, not only continued engagement with the Governor’s Office and Climate Action Council, but also a specific EV working group made up of the Trust, utilities and key industry stakeholders on developing effective statewide programs administered by the Trust that efficiently drive EV adoption. CMP has initiated its own stakeholder engagement process as it explores opportunities to encourage EV adoption in a way that positively and equitably impacts all its ratepayers, where we continue to invite the Trust in an open dialogue. Avangrid companies have seen the most success in its companies that are able to share data between programs, both utility and non-utility for the benefit of the customer in a structured way. As EV programs are developed and evolve, Avangrid sees a long-term benefit in creating a forum for open dialogue and investigating processes for the sharing and exchange of both data, best practices and lessons learned between utility, the Trust and key stakeholders.

5.6 Low-Income Initiatives

CMP is committed to finding opportunities to assist its low-income customers and find opportunities to lower overall costs. CMP commends the Trusts commitment to the multi-pronged approach that the Trust implements in targeting programs that are tailored to low-income Mainer’s. Through our aligned commitment, CMP is open to finding opportunities to share data on low-income customers with the Trust and vice-versa to better target and develop more effective programs that create the most impact, while minimizing any missed opportunities.



5.7 Renewables Program

Where CMP can offer assistance in removing market barriers associated with a lack of information and lack of technical expertise, and additionally innovate opportunities to leverage rate design that encourages increased adoption of renewables, CMP seeks to collaborate with the Trust to develop programs that are well-aligned with rates to offer the best customer benefits. As these emerging markets begin to be implemented across Maine, key stakeholders including the Trust and CMP, will be faced with developing cost-benefit methods that will benefit ratepayers in the short-term and overtime equally. Finding opportunities to be nimble and innovative through a collaborative effort moving towards shared goals set by the State regulators and legislators has continued to be successful across the US and will be a crucial element of reaching Maine's goals in a cost-effective way. We encourage the Trust to engage its utility partners, including CMP, early and often on finding best solutions for ratepayers.

5.8 Electric Vehicle Initiatives

CMP agrees with the objectives and market barriers identified by the Trust and agrees that the identified funding of \$2mm annually for EV rebates and \$2mm annually to promote the installation of chargers will not be a sufficient degree of incentives for the State of Maine to meet its goals of approximately 220,000 EVs by 2030. Through our shared collaboration on the Clean Transportation Roadmap, being coordinated by the Governor's Office of Policy Innovation and the future, CMP is looking forward to gaining increased guidance from the Governor's Office and other key stakeholders on how enhanced programs implemented by the Trust and utility programs might supplement currently planned activity.

Additionally, while range anxiety continues to be an assumed barrier, CMP encourages the Trust and other stakeholders to further assess the charging needs and seeks clarification from the Trust on whether the current plan and programs for overcoming charging availability would limit fast chargers within communities. As battery range increases, and EV adoption grows in both rural areas, and areas with higher density, the need for fast charging may not be limited to key travel locations. Limiting community locations to Level 2 chargers may not be sufficient. CMP encourages the Trust to leverage expertise and resources through their utility partners, including Avangrid's engagement with the Electric Highway Coalition, early and often on siting projects to minimize project costs, operating costs and overall burden to ratepayers.

CMP seeks clarification and expansion on the statement, "The Trust also plans to build upon the findings of an innovation project started in 2020 to leverage incentives to influence home charging behavior at varying times of use." Understanding that the Trust has yet to develop a formal process for the innovation project, as stated below, and in particular if time of use and potentially rates associated with time of use are expected to be a large part of this project, CMP encourages the Trust to engage the utilities and other key stakeholders on a formal working group for the purposes of informing future innovation projects and other associated residential home charging programs.

5.9 Demand Management Program

Avangrid is engaged in multiple approved demand management programs in both New York and Connecticut where program design around customer behavior and the associated impacts vary. In a still nascent market with a multitude of vendors and solutions, Avangrid and its companies are finding opportunities to help customers take advantage of smart devices that benefit their overall bill costs, while impacting other societal, environmental and grid benefits. As programs continue to develop and scale, understanding the cost-benefit of how to incentivize technology adoption and impact customer behavior continues to be a topic of discussion. While approaches and devices become standardized, and increased understanding of customer behavior is learned, making investments whether through incentives or other measures will need to ensure reliability measures are kept up and customers have the most flexible options at the lowest cost. CMP is committed to finding opportunities to collaborate with the Trust and key stakeholders towards efforts that create continued transparency that work towards these shared goals.

6.2 Innovation Program

CMP commends the Trust in its effort to engage in a formal request for information as part of a larger competitive solicitation process for its Innovation Program. CMP recommends that the Trust engage a working group, where the utilities are included, that can inform the Trust and its potential vendors of utility processes in an effort to streamline project timelines and costs, as well as be made aware of any utility programs that may benefit the overall project. Avangrid has been engaged in similar competitive solicitation processes through programs in its other Operating Company states, such as NYSERDA PONs (New York State Energy and Research Development Authority Program Opportunity Notices) and has found that early engagement from utilities can enhance the overall process.

6.3 Public Information and Outreach

CMP is aligned with the Trust where it notes lack of information as a Market Barrier and commends the Trust in its efforts to develop content and materials. CMP encourages the Trust to work toward partnership and coordination with utilities to reach shared customers and expand outreach and education strategies to conserve energy, specifically in areas related to beneficial electrification, including but not limited to heat pump and electric vehicle education.