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July 26, 2021

To: Efficiency Maine Trust

On behalf of the Maine Pellet Fuels Association (“MPFA”), thank you for the opportunity to comment on your draft Triennial Plan V (“TPV”).

The substance of our proposed changes to the TPV were previously conveyed to you by our counsel, Adam Cote, during the July 14th public comment, but we wanted to briefly expand upon them via a written form.

The MPFA was founded in June 2008 as a non-profit corporation in Maine to promote the public benefit from utilizing pellets for heat and energy production, and to support pellet manufacturers and pellet industry suppliers in meeting common challenges. Our members include dozens of wood pellet retailers, distributors, manufacturers, installers and allied businesses throughout the state.

Our recommended edit to the TPV is the inclusion of a section describing the newly created Thermal Energy Investment Program (“the Thermal Energy Fund”). We have attached a copy of the final public law, signed by Governor Mills on June 14, 2021, for your reference.

We believe the two most logical places to add a discussion of the Thermal Energy Fund would be in either Section 2.2 (Program Funds) or 2.5 (Other Statutory Directives). A sample description of the fund could be as follows:

“The Thermal Energy Investment Program was established in 2021 to provide incentives and low-interest or no-interest loans to businesses, municipalities, educational institutions and nonprofit entities for the installation of new thermal energy-derived projects. The Trust, in consultation with the Finance Authority of Maine, is tasked to oversee the fund, created to support such projects. The fund’s principal source of revenues is from alternative compliance payments for thermal renewable energy credits. It is unclear at this time how much revenue will accrue to the fund, but it is expected to begin during Q3 2022. In the interim, the Trust will work with the Commission to establish rules to implement the program, as per the enabling statute.”

Thank you for considering this addition to the TPV. We look forward to working with you on this matter.

William Bell
Executive Director