

Sundog Solar LLC
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February 5, 2025

Senator Mark Lawrence, Senate Chair
Representative Melanie Sachs, House Chair
Committee Members on Energy, Utilities and Technology
2 State House Station
Augusta, ME 04333

LD 32, "An Act to Repeal the Laws Regarding Net Energy Billing"

LD 257, "An Act to Eliminate the Practice of Net Energy Billing"

LD 450, "An Act to Lower Electricity Costs by Repealing the Laws Governing Net Energy Billing"

LD 257, "An Act to Reverse Recent Changes Made to the Law Governing Net Energy Billing and Distributed Generation"

Dear Senator Lawrence, Representative Sachs, honorable and distinguished Members of the EUT committee,

This statement provides written comments from Sundog Solar LLC in opposition of LD 32, LD 257, LD 450 and LD 515..

Sundog Solar and our dedicated company of 30+ employees, has been operating out of Searsport Maine since 2009. We offer installation and maintenance services for photovoltaic, energy storage, heat pump and Electric Vehicle charging technologies. Our company develops turnkey installations for both residential and commercial customers. Sundog's position in the Maine marketplace offers valuable experiences of the interconnection of level 1 and 2 renewable distributed energy resources (DERs).

Sundog's company vision is to "*Energize a Brighter Future*" which we deliver through our mission of "*Megawatts of Happy Customers*". We built and delivered our very first residential grid tied photovoltaic system in early 2010. In those days the culture of the industry was very much about educating the customer that the technology actually worked in Maine. The cost of the installations were around 40% greater on a unit price compared to today's costs. Fast forward 15 years later to a company now installing hundreds of residential and commercial installations per year with thousands of established customers. The foundation upon which we've developed and delivered every single grid tied photovoltaic project throughout our evolution, is **Net Energy Billing (NEB)**.



Net Energy Billing legislation has existed for over 30 years in Maine. The legislation was collectively developed and brought into law with the agreed intention of promoting renewables as part of our local electricity generation mix. The majority of Sundog's customers have benefited greatly through the NEB program allowing them the opportunity to reduce their long term electricity costs by approximately 65%. Many of these customers have also acted on the NEB opportunity out of being inspired and empowered to do their part for our precious environment. The majority of their invested dollars stay within Maine, fueling a portion of the State's economy.

July 10, 2023 the State Legislature passed LD 1986, which requires the ME PUC to procure an annual report on the Net Energy Billing program. The results of the 2023 analysis summarize that the benefits outweigh the costs at a ratio of 1.29 : 1. The below table shows the individual program variants and their individual costs and benefits to the NEB program, resulting in a total of a 30 million dollar benefit over costs to rate payers .

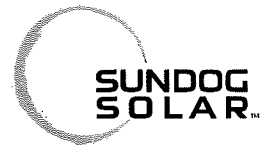
**Table 5 -
2023 NEB Program Variant Summary Cost and Benefit in Millions of Dollars**

Program Variant	Costs	Benefits	Benefit-Cost Ratio
NEB Tariff Rate	\$96.87	\$94.76	0.98
NEB kWh Credit	\$33.89	\$65.57	1.93
NEB kWh Credit (BTM)	\$10.28	\$27.97	2.72
NEB kWh Credit (FTM)	\$23.61	\$37.59	1.59
NEB Program Total	\$130.76	\$160.33	1.23

Source: Analysis of 2023 Net Benefits of Net Energy Billing Program: Prepared for Maine Public Utility Commission

The Solar Energy Industries Association (SEIA) and the Interstate Renewable Energy Council (IREC) concluded that in 2023 the state employed approximately 708 full time, long term solar employees and just under 1,000 direct solar workers amongst the nearly 15,000 workers employed in Maine's clean energy industries. There are approximately 62 solar companies registered within the state, 33 of which are direct installers/developers with the high majority utilizing NEB as the mechanism to value and compensate DER owners for the renewable energy generated. The industry introduced over 2 billion dollars into the Maine's Economy in 2023.

SEIA concluded that there was approximately 1,154 MW of solar installed throughout the State by the end of 2023. This is enough power generation to provide to approximately 204,500 homes throughout Maine with electricity annually. This also represents around 12% of the electricity contributed to the state's total demand. In a recent meeting with Central Maine Power and Versant Power, CMP stated that level 1 interconnection applications rose to approximately 4,000 in 2024, while Versant saw around 900 total applications.



Sundog Solar employed over 50 people throughout the course of 2024. Sundog's hometown of Searsport has acknowledged our company as one of the largest employers in town, providing consistent and stable employment for skilled Mainers for over 15 years. These are high paying, benefit providing, meaningful, long term positions which present ideal opportunities for motivated locals to invest in their future careers.

This regressive, partisan-based bill subverts effective, established legislation which has been working well to manage the market-driven interest in renewable energy adoption and deployment. While there are certainly improvements to be made, and lessons to be learned, from the existing NEB program, a complete dismantling of this effective law, without an alternative solution, will result in the reduction of many Mainers' opportunity to reduce their energy costs, improve their quality of life and contribute to the health of Maine's environment.

On behalf of Sundog Solar, our 30+ employees, and more importantly on behalf of our customers and other interconnection rate payers, we strongly urge this committee to reject both LD 32, LD 257, LD 450 and LD, 515 and vote "NO" on this bill. Thank you kindly for your attention to this critically important matter at hand and for the opportunity for industry leaders to voice our opinions.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Riper".

Danny Riper
Principal Owner
Sundog Solar LLC