

STATE OF MAINE
PUBLIC UTILITIES COMMISSION

Docket No. 2024-00099

October 3, 2025

MAINE PUBLIC UTILITIES COMMISSION
Request for Information for Renewable
Energy Generation and Transmission
Projects Pursuant to the Northern Maine
Renewable Energy Development Program
(P.L. 2023 c. 660)

ORDER ISSUING DRAFT
REQUEST FOR PROPOSALS

BARTLETT, Chairman; SCULLY, GILBERT, Commissioners

I. SUMMARY

The Maine Public Utilities Commission (Commission) issues the attached draft Request for Proposals (Draft RFP) to seek input from potential bidders and other interested parties on the structure and requirements for the procurement of qualified transmission and generation projects in northern Maine. All comments and information submitted in response to the draft RFP must be submitted no later than **Monday, October 27, 2025**.

II. BACKGROUND

The Maine Legislature originally enacted An Act to Require Prompt and Effective Use of the Renewable Energy Resources of Northern Maine, P.L. 2021, Chapter 380 (the Act) in 2021 during its 130th session. Codified at 35-A M.R.S. § 3210-I, the Act requires the Commission to issue a request for proposals seeking to procure: (1) a transmission line or lines that will deliver at least 1,200 megawatts of renewable energy resources located in northern Maine to the system administered by the Independent System Operator – New England (ISO-NE); and (2) renewable energy projects in northern Maine that will generate the energy delivered by that line or lines.

The Commission conducted an initial procurement pursuant to the Act in Docket No. 2021-00369 through an RFP issued on November 29, 2021. In an Order issued on December 22, 2023, the Commission terminated that initial procurement and indicated its intent to initiate a second procurement under the Act.

The Legislature, in P.L. 2023 c. 660, made several amendments to the Act, including that the Commission may now seek to partner or coordinate with other states, governmental entities, or utilities within New England. The Commission issued Requests for Information and Indications of Interest (RFIs) in this docket on May 10, 2024 and April 1, 2025 seeking information from interested parties concerning the initiation of another procurement under the amended Act.

The Commission now issues this Draft RFP, which contains a procurement structure that has been developed based on the information received in response to the RFIs and in consultation with potential partners in other New England states.

III. PURPOSE AND DESCRIPTION OF THE DRAFT REQUEST FOR PROPOSALS

The Draft RFP is offered as a vehicle to allow potential bidders and other interested parties to comment on or provide information relevant to the Commission's approach to a future procurement of at least 1,200 MW of nameplate generation and transmission capacity in Northern Maine (the Northern Maine Procurement). The Commission will consider the submitted comments and information in developing the final RFP for the solicitation of proposals, which the Commission expects to issue before December 31, 2025.

Governmental authorities and public utilities in Connecticut, Massachusetts, Rhode Island, and Vermont (collectively referred to as "coordinating states" herein and in the Draft RFP) have expressed interest in coordinating with the Commission while it conducts the Northern Maine Procurement. The states that do choose to coordinate will be performing their own evaluation of proposals submitted in response to the final RFP to determine if selecting projects jointly with Maine would offer benefits as required by their relevant state authorities.

The Commission intends to conduct the Northern Maine Procurement on a schedule that will allow both the selected transmission and generation projects to submit interconnection requests during the Independent System Operator - New England (ISO-NE) Cluster Request Window that will open in October 2026.¹

The selected transmission line will be required to interconnect with the facilities that are constructed as a result of the Longer Term Transmission Planning (LTP) solicitation currently being conducted by ISO-NE, which seeks new transmission facilities and upgrades to increase the deliverability of energy generated in Maine to the rest of the ISO-NE system. **Accordingly, this procurement is designed to leverage the LTP solicitation and is contingent on ISO-NE selecting a Longer-Term Transmission Upgrade project that meets the requirements outlined in the LTP solicitation.** Specifically, the southern terminus of the transmission line sought in the Northern Maine Procurement will coincide with the northern terminus of the LTP transmission facilities.

¹ More on the ISO-NE cluster study can be found here: https://www.iso-ne.com/static-assets/documents/100026/2025_08_11_third_maine_resource_integration_study_memo_update.pdf

The Commission anticipates that ISO-NE will be publishing in November 2025 a summary of the LTTP proposals it received and that this summary will inform potential bidders in the Northern Maine Procurement of the approximate location of the northern terminus of the LTTP facilities. Thus, at the time bids are due in the Northern Maine Procurement, the specific location of the southern terminus of the transmission line will not be certain. Accordingly, the Commission is considering allowing transmission proposals to include a cost-adjustment mechanism to account for this uncertainty (i.e., the specific location of the northern terminus and the infrastructure and associated reactive power devices ISO-NE may require to reliably interconnect 1,200 MW of generation from Northern Maine).² If allowed, this adjustment would be effectuated once ISO-NE issues the Third Maine Resource Integration Study (Third MRIS).³ The transmission line selected in the Northern Maine Procurement will be an Elective Transmission Upgrade that will take the place of the Cluster Enabling Transmission Upgrade identified in the Third MRIS.⁴

The Draft RFP solicits **proposals that provide for a transmission solution coordinated with one or more generation projects** that utilize the proposed transmission line and minimize the delivered cost of energy by balancing the objective of maximizing throughput with the recognition of costs associated with curtailment and congestion. Proposals may also include options for battery storage in accordance with the Act.

Proposals are expected to include:

- (1) Generation Component: A price proposal for the generation project(s), which will be entering separate Power Purchase Agreements (PPAs) with each of the electric utilities designated by the Commission or the relevant authority in other states for the sale of energy and/or other products.
- (2) Transmission Component: A cost-based estimate of the revenue requirement for the construction and operation of the transmission line that would be incorporated into a rate schedule for the recovery of transmission costs submitted for approval to the Federal Energy Regulatory Commission (FERC) in a proceeding under Section 205 of the Federal Power Act. The approved

² See <https://www.iso-ne.com/system-planning/transmission-planning/longer-term-transmission-studies>.

³ The Commission currently expects a recommended selection in the LTTP solicitation in September 2026. Next, ISO-NE is expected to promptly issue the Third MRIS and identify the transmission facilities that would be required to interconnect 1,200 MW of generation resources sited farther north in Maine than the LTTP facilities as a Cluster Enabling Transmission Upgrade.

⁴ ISO-NE tariff provisions governing Cluster Enabling Transmission Upgrade Regional Planning Studies like the Third Maine Resource Integration Study can be found in OATT Schedules 22, 23, and 25.

rates will then be set forth in a new attachment to the ISO-NE Open Access Transmission Tariff. The Commission and other coordinating states will enter into a Voluntary Agreement (VA)⁵ with the transmission developer governing cost allocation, cost recovery, cost containment, and other relevant issues. The final RFP for the Northern Maine Procurement will contain a term sheet for an acceptable VA, which may include provisions such as: (a) a reduced return on equity for cost overruns; (b) sharing, within limits, of the benefits or additional costs that may result from changes in federal or state law; (c) the right of the Commission and other coordinating states to cancel the transmission project due to cost overruns, with a corresponding right on the part of the transmission developer to request FERC approval of an abandoned plant incentive; and (d) the right of the Commission and other coordinating states to cancel the transmission project if there are any significant changes between what is submitted to the Commission and the information submitted to FERC in a Section 205 proceeding.⁶

The Draft RFP also requires the developers participating in coordinated proposals to include a term sheet for a Coordination Agreement to manage the parameters of their coordination and address the project on project risk. The term sheet and explanation in the proposal must describe how the Coordination Agreement will:

- (1) Ensure the sharing of information on key topics like site control and project development milestones;
- (2) Coordinate development and construction so that the generation and transmission projects, to the extent possible, reach commercial operation together;
- (3) Manage and allocate risks between the developers, and any mechanisms that will reduce the impact of such risks on the ratepayers ultimately supporting these projects;
- (4) Set forth enforcement/incentive mechanisms and an efficient dispute resolution plan; and
- (5) Maximize the use of the transmission line to reduce the delivered cost of energy and, if a proposal contains multiple generation facilities, establish a framework for how access to the transmission line will be allocated among those facilities when the available generation exceeds transmission capacity.

⁵ 175 FERC ¶ 61,225, Docket No. PL21-2-000(June 17, 2021)

⁶ Bidders should not, however, submit a preemptive filing with FERC prior to receiving an award, as that may be counterproductive and slow the process.

As to transmission, the selected transmission developer will be required to promptly initiate a Section 205 proceeding to seek approval of the formula rate and attendant agreements relating to the project.⁷

As to generation, a condition precedent to the PPA will be FERC's approval of a rate schedule submitted by the transmission developer. Moreover, generation developers should be aware that they will not be paid for energy delivered when the transmission line constructed pursuant to this procurement is out of service, and they should therefore address this risk in their Coordination Agreements with transmission developers.

IV. TOPICS FOR COMMENT

The Commission welcomes comments and additional information on any of the provisions of the Draft RFP and the procurement approach described in this Procedural Order. Additionally, the Commission seeks comments and concerns about the following specific issues:

A. An Alternative Approach to Procuring Generation and Transmission

As described above, the Draft RFP contemplates the submission of coordinated generation and transmission proposals in response to the Northern Maine Procurement with the states entering into a Voluntary Agreement for transmission component and their respective utilities entering into PPAs for the generation component. An alternative approach would be to solicit proposals for "all-in" PPAs, where the Northern Maine Procurement would seek projects offering a \$/MWh price for delivered energy and Renewable Energy Certificates. Project developer(s) would be expected to independently procure their own transmission service to deliver the energy and other products. The Commission believes that, to comply with FERC requirements, this would be done through a cost-based, participant funded transmission service agreement between the generation developers and their selected transmission provider.

In order to fully consider all options for conducting the Northern Maine Procurement and secure the best result for ratepayers, the Commission invites potential bidders and other interested parties to comment on the potential benefits and risks of employing an "all-in" PPA approach.

⁷ Developers ***should not*** submit anticipatory filings with FERC prior to receiving an award. Rather, the selected project should work with the Commission and any other states involved and submit a filing with their support.

B. Timelines

Because the Commission anticipates conducting the Northern Maine Procurement on an expedited basis, and due to the long lead times before the generation and transmission projects will reach commercial operation, potential bidders and other interested parties are asked to address:

1. The time necessary for generation and transmission developers to prepare coordinated proposals, including a term sheet for a Coordination Agreement;
2. Issues with the LTTP solicitation that may impact the timeline of the Northern Maine Procurement;
3. The ability of the selected projects to submit interconnection requests during the ISO-NE Cluster Request Window expected to be open in October-November 2026;
4. The expected timing for the submission of a transmission developer's request for Section 205 approval at FERC for the rate schedule and associated agreements that will support the construction and operation of the transmission line;
5. The expected timing for development of the generation and transmission projects and the impacts of this timeline on the developers' ability to offer firm price proposals;
6. The advantages or disadvantages of conducting a first phase of the Northern Maine Procurement to select only the transmission line and then conducting a second phase to select generation projects (including whether this approach would allow Maine and the coordinating states or generation projects to reserve or otherwise ensure that they have adequate capacity available on the transmission line for the delivery of energy under their PPAs);

C. Other Issues

The Commission also seeks comment on the following issues:

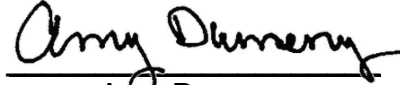
1. Challenges presented by taking a multi-state approach to this procurement and potential solutions;
2. Whether it is necessary for the Commission to initiate and facilitate discussions between generation and transmission developers;

3. Whether, to encourage competition, the Commission should prohibit exclusivity agreements between generation and transmission developers and instead require or encourage developers to submit multiple bids with different proposed pairings of transmission and generation projects;
4. The use of performance incentives and cost containment methods for transmission (e.g., exceeding planned maintenance days could result in cuts to allowed return on equity) to ensure the delivery of energy to the maximum extent possible;
5. Any advantages or disadvantages associated with soliciting fixed-price bids for generation or transmission versus the price indexing contemplated in the Draft RFP;
6. Which costs should be subject to indexing and the most appropriate indices to consider;
7. Methods for or concerns with including capacity revenues in the determination of a price for energy under the PPA with generators;
8. Any operating or other agreements necessary under the ISO-NE Open Access Transmission Tariff;
9. Other provisions that should be addressed in the Coordination Agreement between the generation and transmission developers;
10. Any additional FERC permits, incentives, or authorizations that must be obtained by the selected transmission and generation developers; and
11. Any concerns with the selected developers obtaining the necessary regulatory permits and approvals, including the ability of the selected transmission developer to obtain FERC approval of a rate schedule that is fully in accord with the VA.

Potential Bidders and other interested parties should note that the Draft RFP contains a number of footnotes identifying issues on which the Commission is seeking comment.

In order to protect proprietary or other sensitive business information, the Commission will keep submitted comments confidential. If commenters wish for their submission to be made public they must clearly indicate this.

Dated at Hallowell, Maine, this 3rd day of October 2025.



Amy Dumeny

Administrative Director