

STATE OF MAINE
PUBLIC UTILITIES COMMISSION

Docket No. 2024-00099

April 1, 2025

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)

SECOND REQUEST FOR
INFORMATION AND
INDICATIONS OF INTEREST

I. SUMMARY

Through this second Request for Information and Indications of Interest (RFI), the Maine Public Utilities Commission (Commission) seeks additional information to enable its procurement of qualified transmission and generation projects pursuant to the Northern Maine Renewable Energy Development Program (Northern Maine Procurement). As detailed below, the Commission is requesting interested entities to provide information concerning and comment on both the Northern Maine Procurement and recent developments that will impact the Northern Maine Procurement on or before **June 2, 2025**, with supplemental comments permitted through **September 30, 2025**. Given these recent developments, the Commission is also requesting that potential bidders submit either new or revised Indication of Interest forms on or before **June 2, 2025**.

II. BACKGROUND

In an Order issued in Docket No. 2021-00369 on December 22, 2023, the Commission terminated an earlier Northern Maine Procurement initiated by a Request for Proposals (RFP) issued on November 29, 2021 (Initial Procurement). As noted in the December 22, 2023 Order, the Initial Procurement was conducted in accordance with 35-A M.R.S. § 3210-I, which codifies An Act to Require Prompt and Effective Use of the Renewable Energy Resources of Northern Maine, P.L. 2021, Chapter 380 (the Act) and implements the Northern Maine Renewable Energy Development Program. The Commission also indicated its intent to initiate a new procurement and to consider what changes, if any, should be made to the procurement process before issuing a new RFP.

After the conclusion of the Initial Procurement, the Legislature made several amendments to the Act that will impact any new procurement conducted under the Northern Maine Renewable Energy Development Program. P.L. 2023 c. 660. As amended, the Act now requires the Commission to conduct a procurement for proposals to: (1) develop and construct a “transmission line or lines necessary to connect at least 1200 megawatts of renewable energy resources located in Northern Maine” to the ISO-

NE system; and (2) develop and construct renewable energy generation projects that would transmit power across that line. In doing so, the Commission may seek to partner or coordinate with other states, governmental entities, or utilities within New England. In addition, in P.L. 2023 c. 664, the Legislature made a number of amendments to the statutes governing the approvals required for developing and siting a transmission line, including 12 M.R.S. § 598-C, 35-A M.R.S. §§ 3132, 3136, and 38 M.R.S. §§ 485-A, 486-A, which may impact the Northern Maine Procurement.

On May 10, 2024, the Commission issued an initial RFI seeking information relevant to commencing a new procurement under the amended Act and the impact of the changes to the approval requirements for transmission lines. The Commission received more than twenty responses containing recommendations for conducting the Northern Maine Procurement and describing various factors and challenges the Commission would need to consider.

More recently, on December 13, 2024, the New England States Committee on Electricity (NESCOE) filed a request with ISO New England (ISO-NE) to conduct a regional solicitation (the LTTP Procurement) under the long-term transmission planning process (LTTP) approved by the Federal Energy Regulatory Commission (FERC) on July 8, 2024. NESCOE described its objectives in doing so as: (1) strengthening the connection between northern and southern New England and (2) facilitating the integration and deliverability of additional affordable generation resources located in Maine. To achieve these objectives, NESCOE requested that ISO-NE issue an RFP under the LTTP with the following scope of transmission upgrades:

- (1) A requirement to increase the Maine-New Hampshire interface capacity to at least 3,000 MW by 2035 and increase the Surowiec-South interface capacity to at least 3,200 MW by 2035;
- (2) A requirement to develop new infrastructure (e.g., substation) at Pittsfield, Maine that can accommodate the interconnection of at least 1,200 MW (nameplate) of onshore wind. Pittsfield should be used as the presumed location based on previous analysis, however, bidders may propose alternate locations which bidders, based on their own expertise, conclude would be more efficient and cost-effective; and
- (3) The required in-service date for both scope components would be by 2035 unless a bidder can demonstrate supply chain issues that warrant a later in-service date. A strong preference should be given to bids with an in-service date by 2035, or as close as possible thereto recognizing supply chain constraint information bidders provide.

In describing this scope for a regional solicitation, NESCOE emphasized that it reflects minimum requirements and that bidders could propose projects that exceed the minimum requirements if the bidders believe that such expansion would be cost-effective.

After issuing a draft RFP and receiving stakeholder comments, ISO-NE issued its 2025 Long-Term Transmission Planning RFP on March 31, 2025, which can be found at: <https://www.iso-ne.com/system-planning/transmission-planning/competitive-transmission>

III. REQUEST FOR INFORMATION AND RELATED PROCESS

The Commission seeks information and comments from interested parties on the topics and questions identified below. In particular, the Commission seeks information and comment from project developers, including prior and potential future bidders in the Northern Maine Procurement as well as potential state and utility partners. The Commission also encourages comment from other interested entities.

A. Topics for Comment:

1. Potential bidders/developers are asked to provide a brief description of the project or projects they would develop pursuant to the Northern Maine Procurement, including a description of how the project(s) would be impacted by different possible outcomes of the ISO-NE regional solicitation.
2. With regard to ISO-NE's regional solicitation, please respond to the following questions:
 - a. What would be the overall impact of ISO-NE putting in place the upgrades requested by NESCOE? How would these upgrades better facilitate the Northern Maine Procurement? How should these potential upgrades be incorporated into an RFP issued by the Commission?
 - b. How should the Northern Maine Procurement be sequenced in relation to the LTTP Procurement and what factors should inform that calculation?
 - c. The LTTP solicitation process will include an extended bid evaluation and selection process. What information (e.g., the location of the northern terminus of the LTTP solution or the electrical properties (AC vs. DC) of the LTTP solution) might prospective bidders in the Northern Maine Procurement need about LTTP bid(s)/selected project(s) in order to submit a fully developed bid for the Northern Maine Procurement? At what point in the ISO-NE solicitation process would this information be available to potential bidders such that they could submit fully developed proposals for the Northern Maine Procurement?
 - d. Once necessary information regarding the LTTP Procurement is available to potential bidders, how much time should be allowed

before the bid submission deadline for the Northern Maine Procurement?

3. With regard to ISO-NE interconnection processes, please respond to the following questions:
 - a. The clustering process outlined in section 4.2 of Schedule 22 (LGIP) of ISO-NE's Open Access Transmission Tariff (OATT) is triggered when "there are two (2) or more Interconnection Requests without completed Interconnection System Impact Studies in the same electrical part of the New England Control Area[.]" If only a single generator project is selected in the Northern Maine Procurement, would a clustering process be triggered? If not, what would be the interconnection process? How, if at all, would this interact with the 3rd Maine Resource Integration Study?
 - b. To what extent may a generator seeking interconnection in ISO-NE dictate where on the system it interconnects? For example, may a generator located in Aroostook County request interconnection near Pittsfield? If multiple such generators similarly requested interconnection near Pittsfield, how would this interact with the ISO-NE cluster-enabling upgrade regional planning study (CRPS) process?
 - c. An Elective Transmission Upgrade (ETU) can take the place of a Cluster-Enabling Transmission Upgrade (CETU) or a portion of a CETU that is identified in a cluster study like the third Maine Resource Integration Study (MRIS). An ETU can also be designed and developed without reference to such a cluster study. Please comment on how these processes can or should interact with the Northern Maine Procurement, including whether an ETU replacing an already-identified CETU must pass through the interconnection process and how ISO-NE's Order 2023 filing may impact that process.
 - d. If the final scope of the transmission portion of the Northern Maine Procurement RFP and bids received in response do not exactly match the CETU identified in the third MRIS, what are the implications for the interconnection process and other ISO-NE tariff processes? What is the effect if the Northern Maine Procurement RFP scope is larger or examines a different question than that studied in the third MRIS (e.g., seeking to interconnect more than 1,200 MW of resources)?
 - e. Please comment on the ISO-NE tariff treatment of a transmission solution resulting from the Northern Maine Procurement that consists

- of a radial line extending from Pittsfield directly to the generation resources vs. one that interconnects elsewhere north of Pittsfield (e.g., at Haynesville on the 3001 line) before proceeding north to the location of the resources? Among other things, please address any OATT considerations or potential implications of treating the line as part of the bulk power system (BPS)?
- f. The generator(s) selected in the Northern Maine Procurement may or may not match the exact QPs studied in the third MRIS. In the case that they do not exactly match, what are the implications for the interconnection process, cost allocation, and other ISO-NE tariff processes?
 - g. Assume that the FERC approves ISO-NE's Order 2023 compliance filing and ISO-NE establishes new dates for the initiation of the transitional cluster study with no other modifications to the tariff. Please comment on the interdependencies (e.g., timeline or study fees) between the transitional cluster study, the release of the third MRIS and relevant deadlines, and the Northern Maine Procurement.
4. What ISO-NE issues (other than the LTTP RFP) may impact the Northern Maine Procurement? This may include, but need not be limited to, how projects would be positioned with respect to the Maine Resource Integration Studies, other applicable ISO-NE studies, Capacity Auction Reforms (CAR), or interconnection processes.
 5. To the extent not addressed in the ISO-NE process, please address whether or how the Commission should enable the regional allocation of costs and benefits, including regional treatment of the Northern Maine Procurement?
 6. Please describe issues related to developing transmission and generation projects in stages/phases and how this might relate to ISO-NE's process for developing the expected transmission upgrades under the LTTP RFP.
 7. Please comment on issues relating to whether and how the transmission portion of the Northern Maine Procurement could be structured to minimize costs of developing more than 1,200 MW of onshore wind in Northern Maine in the long term. Some examples of issues to address are the ISO-NE 1,200 MW loss of source limit and stability or voltage issues in that part of the ISO-NE transmission system.
 8. How should the Commission coordinate with and enable/encourage participation by other off-takers, including but not limited to other states or utilities in the region? What approaches or procurement structures would be best suited to such participation (e.g., one joint procurement versus

multiple independent but coordinated procurements; contract party status in the contracts to be approved in this procurement versus off-taker status for the resale of the renewable energy procured through contracts approved by the Commission)?

9. How should the Commission evaluate the proposed economic benefits to Northern Maine, and how can it ensure those benefits are realized? How should this evaluation be conducted if the Northern Maine Procurement involves multiple states or other off-takers?
10. Please identify the project-on-project risks that could exist between the development, construction, and operation of the transmission project and generation project(s) selected in the Northern Maine Procurement and respond to the following questions:
 - a. Are there advantages or disadvantages to allowing or prohibiting combined or linked transmission and generation project proposals? How should the Northern Maine Procurement be structured to coordinate and/or align the development of transmission and generation projects to realize any advantages or avoid any potential disadvantages? How, if at all, would the expected ISO-NE transmission upgrades affect the possibility of having such linked transmission and generation projects and any advantages or disadvantages?
 - b. Are there examples from other jurisdictions or procurement processes that could be incorporated into the Northern Maine procurement to mitigate project-on-project risk?
 - c. How could permitting, procurement, and milestones (including milestones for construction) for the selected transmission and generation projects be aligned in order to minimize the risk that costs could be incurred due to the generation project(s) reaching commercial operation before transmission is available?
 - d. What information would the selected generation developer(s) need to alleviate any risks related to the permitting of the selected transmission project?
 - e. What are the potential sources of delay for the permitting and development of the transmission project? Are there transmission milestones that would need to be met before a generation developer could commit to a milestone in developing its project?
 - f. If the transmission project does experience delays, what flexibility should the generation developer(s) have to modify their development schedule(s)?

- g. What development progress information would transmission and generation developers be willing to share, or should be expected to share, in order to support alignment of their projects?
 - h. If the transmission project is delayed, should the price for contract products awarded to the generation developer(s) be adjusted? How could this be done while protecting ratepayers?
 - i. What would be the benefits or disadvantages of including a term in the off-taker contract with the generation project(s) stating that the off-taker would not commence purchasing any contract products until a date set in coordination with the required in-service date of the transmission project?
 - j. Even with steps taken to mitigate project-on-project risk, transmission and generation developers could potentially still be exposed to capital and operational costs due to occurrences involving the other project. What are the range and magnitude of these costs? Can they be addressed in a manner that adequately protects ratepayers?
 - k. During planned and unplanned transmission outages, the generation project(s) and the off-taker(s) could be subject to lost revenues and/or increased costs. Are these costs addressed in the OATT, the interconnection agreement, or other ISO-NE governing documents? To the extent they are not, how could these potential lost revenues and increased costs be addressed?
 - l. How could project-on-project risk affect financing and supply chain contracting for both transmission and generation projects? How could the Northern Maine Procurement be structured to mitigate these issues and help produce a result that is more cost-effective for ratepayers?
 - m. What other mechanisms to mitigate and allocate risks associated with the development and operations of the transmission or generation project(s) could the Commission put in place to protect ratepayers?
11. Please describe the costs and benefits of a contract term that is shorter or longer than 30 years for transmission projects and 20 years for generation projects.
12. In the context of a multi-state procurement, could project developers sign differing contract term lengths (e.g., 10-20 years for State A and 20-30 years for State B)?

13. What, if any, FERC Open Access related issues, or any other FERC related issues and rulings, may impact the Northern Maine Procurement? For example, may a transmission line from Pittsfield to generators' points of interconnection offer service under negotiated rate authority? How, if at all, may generators, utilities, or other off-takers obtain firm transmission rights on that line?
14. To what extent should the costs of upgrades to the existing transmission network be borne by the developer(s)? How should cost responsibility be determined and allocated between/among transmission and generation projects? To what extent may the expected ISO-NE upgrades remove or reduce the impact of this issue, and what issues will still remain notwithstanding those expected upgrades?
15. In addition to those raised in response to the May 10, 2024 RFI, are there any Land Use and Right-of-Way issues, such as the use of existing rights-of-way and developers' community engagement plans, that the Commission should consider?
16. What financial security requirements should the Commission put in place for bidders, including form, amounts, timing of required security, the conditions of draw, or uses of security?
17. What should be the latest allowable commercial operation date for transmission and generation projects bidding into the Northern Maine Procurement?
18. How could the Northern Maine Procurement be designed to best account for current and future rates of inflation and supply chain and other economic pressures on the onshore wind and/or transmission industries to both ensure project viability and protect ratepayers?
19. Please comment on what tax credits or other funding opportunities may be available to projects bidding into the Northern Maine Procurement, including but not limited to a discussion of how recent Executive Orders from the current federal administration may impact the availability of these opportunities.
20. What is the likelihood of maximizing federal tax credits and reducing developer costs by including agreements described in 29 U.S.C. § 158(f)? Please include a description of the available base tax credit as well as the potential adders that developers could use to reduce their costs.
21. What other key commercial terms not addressed elsewhere should be addressed in the Transmission and Power Purchase Agreements?

22. To the extent not already identified in response to a prior question, please describe the potential impact(s), if any, of recent Executive Orders issued by the current federal administration concerning wind power, trade policy, or trade relations with other nations. See, e.g. “America First Trade Policy” issued by the White House on January 20, 2025; “Unleashing American Energy” issued by the White House on January 20, 2025; “Imposing Duties to Address the Flow of Illicit Drugs Across Our Northern Border” issued by the White House on February 1, 2025; and “Adjusting Imports of Steel into the United States” issued by the White House on February 10, 2025.
23. Please identify the federal permits required for potential transmission and generation projects and how recent Executive Orders may impact a project’s ability or timeline for receiving such permits.

Initial comments should be submitted by **June 2, 2025** by filing in the Commission’s Case Management System¹ in Docket Number 2024-00099, and commenters may submit supplemental comments, if any, through **September 30, 2025**. Please note that this is a “secured” docket and these submissions will be visible only to the Commission, including its Staff and Consultants, the Maine Governor’s Energy Office, other state agencies and prospective state and utility partners that express interest in participating in a joint procurement, subject to appropriate memorandums of understanding, non-disclosure agreements, protective orders, or other measures taken to ensure the confidentiality of submitted materials. Following submission of these comments, Commission Staff may schedule meetings with commenters and prospective partners to further inform the Northern Maine Procurement.

B. Indications of Interest

Concurrent with this RFI, the Commission is requesting interested project developers and potential bidders to submit a new or revised Indication of Interest in the procurement. Specifically, interested project developers and potential bidders in the Northern Maine Procurement are hereby requested to complete the Indication of Interest form provided on the Commission’s website at <https://www.maine.gov/mpuc/regulated-utilities/electricity/rfp-awarded-contracts/northernmainerfp>.

Completed Indication of Interest forms, which will also be held securely and thus only visible to the Commission, including its Staff and Consultants, and other prospective state and utility partners under appropriate protection mechanisms, should be submitted by **June 2, 2025** via email to NorthernME.RFP.PUC@maine.gov. Developers and potential bidders are strongly encouraged to provide an Indication of Interest form. Failure to do so, however, will not preclude a developer or bidder from submitting a bid in accordance with the procurement schedule and requirements as they are developed.

¹ The Commission’s Case Management System can be accessed at: <https://mpuc-cms.maine.gov/CQM.Public.WebUI/ExternalHome.aspx>

Dated at Hallowell, Maine, this 1st day of April, 2025.

/s/ Amy Dumeny

Amy Dumeny
Administrative Director