

These are my remarks on *Triennial Plan VI Draft Overview for Public Comment* (hereafter called TPVI), issued June 5, 2024. Page numbers refer to the pages of that document.

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## **Natural Gas**

p. 5: At bottom it states that “significant changes and updates to the Plan” during the three-year period must be approved by the EMT Board and by PUC. It seems imperative that the final TPVI give some definition of “significant”.

p. 15, bullet 1: The Maine statute requires EMT to “identify” MACE savings for electricity and natural gas.  
The estimates of costs and benefits of programs for MACE as of the last year of TPV should be described in the final plan.

p. 27, bullet 3 under “Findings”: “ Due to severely diminished opportunity, natural gas incentives remain suspended”. I am glad to read that the TPVI intends to continue the suspension of incentives related to natural gas appliances and heating equipment. Furthermore, the intent to provide incentives for weatherization of gas-heated spaces makes sense in that it eases dependence on fossil fuel now and is a logical step for preceding eventual conversion to heat pump electrical heating.

## **Weatherization**

p. 35: 2nd bullet under Findings says that weatherization of gas-heated homes will continue. This does not seem unreasonable.

p. 35: 6th bullet under Findings says that subsidizing pellet stoves will be discontinued. This seems reasonable. Burning of wood products does not carry a neutral carbon budget and should be discouraged within Maine.

p. 39: 7th bullet under Findings says 1,100 homes per year for weatherization. This conflicts with earlier (p. 35) figure of 2,220 homes per year, which seems like a better target.

## **Electric Vehicle Initiatives**

p. 43: Under Measures Considered, it should be added that the state should set ambitious goals for electrification of its fleet.

p. 43: Under Incentives and Financial Considerations, I support enhanced rebates for income-eligible Mainers to purchase and/or install electric vehicles charging units in their homes.

p. 45: The list of initiatives in marketing and awareness is excellent. I would add an initiative to get apartment owners to install EV charging stations for already built units and to plan for EV charging stations in any new multi-family development.

## **Demand Management**

Appendix O: It is not clear from Appendix O what will be done with respect to demand management, so no comment was possible here. I firmly believe that various types of demand management for electricity should be part of the overall Maine Climate Council strategy. Such programs have worked effectively in other states to both smooth the daily demand curve and to decrease the overall level of consumption of electricity.