OPPOSE
Senate Finance
March 30, 2022

House Bill 818 Electricity – Community Solar Energy Generation – Consolidated Billing

Baltimore Gas and Electric Company (BGE) opposes *House Bill 818 - Electricity – Community Solar Energy Generation – Consolidated Billing*. House Bill 818 authorizes a subscriber organization for a community solar energy generating system (CESGS) to participate in utility consolidated billing provided by the electric company serving the territory of the community solar energy generating system. The effective date of the legislation is July 1, 2023. This legislation presents a very aggressive schedule to implement a complex change to the current pilot program which would be implemented with less than two years left in the pilot. Conceptually, BGE does not necessarily oppose the participation of subscriber organizations in utility consolidated billing but has some concern that the schedule provided is insufficient to accomplish the complex tasks required.

Subscriber organizations currently bill subscriber charges in parallel to the BGE billing process and House Bill 818 would allow the subscriber charges to be consolidated on the BGE bill. This customer convenience is in line with BGE's customer focus, but we share the concerns of others about transitioning too quickly. Certain implementation details would need to be addressed by the Maryland Public Service Commission. Additionally, modifications of utility billing systems can be costly, and adequate time should be provided for billing system modifications. Instead of this compressed timeframe, a comprehensive review of these issues would be more appropriate for consideration once the CESGS pilot is concluded. Waiting until after the pilot has concluded would also allow for issues identified during the pilot to be addressed when implementing utility consolidated billing, which would help to minimize the costs that will ultimately be borne by customers.

For the above reasons, BGE respectfully request an unfavorable vote on House Bill 818.