

## **Position Statement**

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## Senate Bill 62 Land Use - Public Service Companies - Pollinator-Friendly Vegetation

Baltimore Gas and Electric Company (BGE) appreciates this opportunity to provide comments on Senate Bill 62: Land Use – Public Service Companies – Pollinator–Friendly Vegetation Management. While BGE remains dedicated to supporting pollinator habitats, we are concerned that the narrow mowing windows in this legislation could compromise our twin obligation to maintain a safe and reliable electric system.

Supporting pollinator habitats and biodiversity is an integral part of BGE's operations, with an emphasis on transforming transmission rights-of-way throughout central Maryland into a more welcoming place for pollinators to live. BGE actively manages 1,900 acres of rights-of-way using Integrated Vegetation Management (IVM) to improve wildlife habitats and has a goal to increase that number to 3,000 acres by 2025. IVM also encourages the growth of compatible low-growing native shrubs and grass; it lowers BGE's carbon footprint because it requires less mowing and improves water quality within the Chesapeake Bay Watershed.

BGE's pollinator support extends beyond transmission corridors. While eight BGE rights-of-way are certified by the National Wildlife Federation and/or the Wildlife Habitat Council, nine additional company sites also hold these certifications for being welcoming to pollinators and other wildlife species.

As an owner and manager of thousands of acres of land, BGE is well positioned to be a leader of pollinator stewardship. In fact, BGE is applying for a binding Conservation Agreement with Assurances (CCAA) with the U.S. Fish and Wildlife Service to protect the monarch butterfly. BGE would pledge under its CCAA to convert 18 percent of transmission rights-of-way to pollinator habitats specifically to protect the monarch, which is threatened so significantly it is a candidate to be listed under the Endangered Species Act. More than 400 acres of BGE rights-of-way already meets CCAA pollinator habitat criteria.

Despite the company's deep commitment to pollinator friendly habitats, BGE has reservations about Senate Bill 62 as introduced. A mowing window limited to only February or March reduces operational flexibility, especially in years when cold weather persists through February. We look forward to continued conversations with the sponsor to address this concern.

BGE, headquartered in Baltimore, is Maryland's largest gas and electric utility, delivering power to more than 1.2 million electric customers and more than 655,000 natural gas customers in central Maryland. The company's approximately 3,400 employees are committed to the safe and reliable delivery of gas and electricity, as well as enhanced energy management, conservation, environmental stewardship and community assistance. BGE is a subsidiary of Exelon Corporation (NYSE: EXC), the nation's leading competitive energy provider.