



Bill: Maryland Building Performance Standards - Fossil Fuel Use and Electric Ready Standards

Position: OPPOSE

Dear Chair, Vice Chair, and Members of the Committee:

On behalf of the Maryland Coalition for Inclusive Energy Solutions (MCIES), a trade association promoting the inclusivity of all energy sources to meet the state's energy needs, I am writing to oppose HB 210.

This bill fails to address several critical issues and could have detrimental effects on our state's energy landscape.

Firstly, electrifying buildings does not guarantee decarbonization, as a significant portion of Maryland's electricity is still generated from fossil fuels. Mandating building electrification under these circumstances merely shifts emissions from individual buildings to centralized electric generation facilities through increased electricity use, exacerbating rather than mitigating the problem. There are also uncertainties around the feasibility of abandoning natural gas for widespread electrification and if the grid will be able to accommodate the increased load. The United States Department of Energy's 2023 Transmission Needs Study found that PJM must increase within-region transmission by 61% by 2035 and interregional transfer capacity with the Midwest region by 474% by 2035, both relative to 2020 to accommodate high load and high clean energy growth. Major transmission lines can take more than a decade to obtain permits. This does not account for the planning, purchasing of land, construction, and other subsequent activities that go into making new transmission operational on the grid.

Moreover, the legislation prohibits the use of innovative technologies such as renewable natural gas and hydrogen, which offer cost-effective and environmentally friendly alternatives for heating and energy provision. By limiting options and innovation, the bill stifles progress towards true decarbonization and sustainability.

Furthermore, while the bill allows for waivers under certain circumstances, it restricts customer choice for those constructing new homes or commercial spaces. Financial considerations, which are often paramount in such decisions, are disregarded.

House Bill 210 may also face legal challenges, as it could be preempted by federal law, specifically the Energy Policy and Conservation Act. This raises serious questions about the enforceability of the proposed legislation, as well as the legality following the Ninth Circuit



Court's decision striking down the Berkely, California ban of natural gas hookups in new construction.

We urge policymakers to consider the adoption of low-carbon technologies and modernization of our energy infrastructure as it considers emission reductions. For these reasons, we respectfully request an unfavorable report.

Sincerely,

A handwritten signature in blue ink, appearing to read "George K. Anas".

George K. Anas
President