

**Testimony from Joel Harrington on behalf of REV Renewables
In Favor of HB0398, Affordable Abundant Clean Energy Act (AACE)**
February 4, 2025
House Economic Matters Committee

Chairman Wilson, Vice Chairman Crosby and members of the House Economic Matters Committee,

Thank you for the opportunity to submit comments on House Bill 0398, the Affordable Abundant Clean Energy Act. Our comments in support are limited to the transmission-connected energy storage provisions of the legislation.

With nearly 3 GW of operating assets and a substantial development pipeline across the U.S., REV is an industry leader in the development, acquisition and operation of renewables and energy storage. REV has significant energy storage experience, including bringing online five battery storage projects in California with several more in late-stage development, and operating three pumped-storage hydro facilities in PJM.

In Maryland, REV recently completed construction of its 20-megawatt Jade Meadow solar facility in Allegany County and is the owner/operator of the 13-megawatt Rockfish solar facility in Charles County. Additionally, REV has several Maryland solar and energy storage projects in active development. With 300 megawatts in PJM “fast lane” interconnection queue, REV’s storage projects are positioned as a first mover to help stabilize capacity price volatility and improve reliability for Maryland ratepayers.

Baltimore Gas & Electric Locational Delivery Area has 13 interconnection requests in the PJM queue which equal approximately 1,200 MW of capacity, 75% of which is energy storage. If all of these projects were to be built, it would be the equivalent of a large power plant operating during peak periods when the price of energy is at its highest.

REV Strongly Supports the AACE Act’s Procurement Program for 1,600 Megawatts of Dispatchable Energy Storage

Maryland is in dire need of new in-state capacity, as illustrated by the 2025/26 PJM capacity auction that resulted in high prices for Maryland ratepayers. Storage is the main resource in the PJM interconnection queue that can provide in-state capacity in a short period of time compared with conventional sources of generation that take several years to build. It is critical to help these resources



come online with a state procurement program to alleviate capacity shortages and prices as soon as possible.

REV presented on the partial toll procurement model in the Public Service Commission's Maryland Energy Storage Initiative workgroup – a model that is widely used in California for energy storage. In this procurement model, the developer/owner would receive a fixed price long-term contract of at least 10 years for the capacity portion of the storage resource only, and in return the resource would participate in the PJM capacity auction and return any auction revenue back to the ratepayers. REV highly recommends this model be included as a procurement mechanism for front-of-the-meter transmission-level storage projects. We believe the partial toll procurement model may help address concerns raised by some stakeholders about how risk is shared between developers and ratepayers. In particular, the partial toll may lower risk to utility customers as the storage owner would bear the commercial risks for energy and ancillary services products. A partial toll also provides a financial hedge on capacity prices for ratepayers.

REV appreciates your consideration of our comments and looks forward to working with the Maryland General Assembly and members of the Committee over the next few months to attract new energy investments, improve reliability, and stabilize electric prices for Maryland consumers.

Sincerely,

/s/ Joel M. Harrington

Joel M. Harrington
Director of Government Affairs
REV Renewables
575 5th Avenue, Suite 2501
New York, New York 10017
jharrington@revrenewables.com