



WRITTEN TESTIMONY

HOUSE BILL 398 – Abundant Affordable Clean Energy – Procurement and Development (AACE Act)

Submitted to: House Economic Matters Committee

Hearing Date: February 6, 2025

Submitted by: Joanne Frederick, President

On Behalf of: Stop MPRP, Inc.

POSITION: FAVORABLE WITH AMENDMENTS

Thank you for the opportunity to submit testimony on House Bill 398, the Abundant Affordable Clean Energy – Procurement and Development (AACE) Act. I am submitting this testimony on behalf of Stop MPRP, Inc., a non-profit organization committed to protecting Maryland’s landowners, farms, forests, and communities from unnecessary overhead transmission projects like the Maryland Piedmont Reliability Project (MPRP).

We support the goals of HB 398 in expanding Maryland’s clean energy infrastructure, increasing energy storage, and modernizing the electric grid. However, we strongly urge the committee to adopt amendments that explicitly prevent unnecessary new overhead transmission projects, ensure that grid expansion prioritizes existing infrastructure, and require undergrounding where new transmission is deemed essential. Without these safeguards, HB 398 could inadvertently allow continued overdevelopment of transmission infrastructure at the expense of Maryland’s rural communities, property owners, and natural landscapes.

Recommended Amendments

1. Require Cost-Benefit Analysis Before Any Transmission Expansion

Proposed Language: Amend § 7-704.3 (b)(2)(iii) to include:

“SHALL ENSURE THE COMPLETION OF A COST-BENEFIT ANALYSIS THAT COMPARES ALL NEW TRANSMISSION PROJECTS TO ALTERNATIVE GRID SOLUTIONS, INCLUDING ENERGY STORAGE, DEMAND RESPONSE, AND DISTRIBUTED GENERATION SOLUTIONS.”

2. Require Undergrounding of Any New Transmission

Proposed Language: Add a new section to Public Utilities Article § 7-1206 stating:

“(E) ANY NEW TRANSMISSION LINES APPROVED UNDER THIS SECTION SHALL BE PLACED UNDERGROUND UNLESS THE APPLICANT DEMONSTRATES THAT UNDERGROUNDING IS NOT TECHNICALLY FEASIBLE OR THAT THE COST OF UNDERGROUNDING EXCEEDS ALL AVAILABLE ALTERNATIVES, INCLUDING ENERGY STORAGE OR DISTRIBUTED GENERATION.”



3. Limit Transmission Expansion to Existing Infrastructure

Proposed Language: Amend § 7-704.3 (b)(2)(ii)(2) to state:

“TO THE EXTENT POSSIBLE, ALL TRANSMISSION UPGRADES SHALL UTILIZE EXISTING INFRASTRUCTURE BEFORE CONSIDERING NEW CONSTRUCTION, INCLUDING UPGRADING EXISTING TRANSMISSION LINES TO HIGHER VOLTAGE LEVELS AND USING HIGHWAYS OR RAILWAYS FOR NEW TRANSMISSION ROUTES.”

4. Prevent Ratepayer Burden for Unnecessary Transmission Expansion

Proposed Language: Amend § 7-1216 to include:

“(7) TRANSMISSION EXPANSION PROJECTS THAT ARE NOT REQUIRED TO MEET A DEMONSTRATED GRID RELIABILITY NEED MAY NOT BE FUNDED THROUGH RATE INCREASES ON MARYLAND RATEPAYERS.”

Why These Amendments Are Necessary

While HB 398 takes significant steps toward a cleaner and more resilient energy future, it does not **explicitly prevent unnecessary transmission expansion** or ensure that **storage and distributed energy solutions are prioritized over new transmission lines**. Without these amendments, projects like the Maryland Piedmont Reliability Project could still move forward, impacting private landowners, farmland, and conservation areas.

- Energy storage and grid modernization should replace, not justify, new transmission projects.
- Protecting Maryland’s communities from unnecessary eminent domain claims must be a priority.
- Existing infrastructure should be maximized and optimized before any new transmission corridors are considered.

We urge the committee to support HB 398 **only if these amendments are adopted**. Thank you for your time and consideration.

Respectfully submitted,

Joanne Frederick

President

On Behalf of Stop MPRP, Inc.