WRITTEN TESTIMONY
SENATE BILL 316 – Abundant Affordable Clean Energy – Procurement and Development (AACE Act)
Submitted to: Senate Education, Energy, and the Environment Committee
Hearing Date: February 13, 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 Senate Bill 316, 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 SB 316 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, SB 316 could inadvertently allow continued overdevelopment of transmission infrastructure at the expense of Maryland's rural communities, property owners, and natural landscapes.

Contradictions Between MPRP and Environmental Protection
While SB 316 promotes clean energy solutions, projects like the Maryland Piedmont Reliability Project (MPRP) stand in stark contrast to these goals. If permitted to move forward, the MPRP would cause significant environmental harm, undermining the very principles of clean energy and sustainability:

1. **Deforestation and Habitat Destruction**
    - The proposed MPRP route cuts through **critical forested areas of the Maryland Piedmont**, resulting in mass deforestation.
    - Clearing these forests eliminates carbon sinks, counteracting the carbon reduction benefits of renewable energy.
    - The destruction of these wooded areas threatens native wildlife, including **species dependent on intact forest ecosystems**, such as migratory birds, amphibians, and pollinators essential for agricultural sustainability.
2. **Harm to Farmland and Agricultural Productivity**
    - Large-scale transmission towers and rights-of-way **permanently disrupt farmland**, making productive land unusable.
    - Heavy machinery and soil compaction from transmission line construction **reduce soil fertility** and **increase runoff**, exacerbating erosion and threatening the Chesapeake Bay watershed.

- The project would displace farmers who rely on this land for their livelihoods, contradicting Maryland's stated commitment to **agricultural preservation and food security**.

3. **Threats to Water Quality and Wetlands**
   - The proposed transmission corridor **crosses multiple streams, wetlands, and watersheds** that flow into the Chesapeake Bay.
   - Construction activity would introduce **sediment pollution and chemical runoff**, harming aquatic ecosystems and drinking water sources.
   - Maryland has invested billions in **cleaning up the Chesapeake Bay**, and the MPRP threatens to **reverse this progress** through increased stormwater runoff and habitat fragmentation.
4. **Increased Heat Island Effect and Land Degradation**
   - Overhead transmission lines replace natural landscapes with barren rights-of-way, **removing tree cover and increasing land surface temperatures**.
   - This exacerbates the urban heat island effect, making nearby communities more vulnerable to extreme weather events driven by climate change.
   - Vegetation removal along transmission corridors leads to **long-term biodiversity loss** and makes land more susceptible to invasive species.
5. **Undermining Distributed Energy and Storage Solutions**
   - MPRP focuses on long-distance transmission rather than **investing in local energy resilience**, which **increases reliance on distant energy sources rather than strengthening Maryland's own energy independence**.
   - Instead of supporting **battery storage, microgrids, and rooftop solar**, the project locks Maryland into outdated infrastructure that is vulnerable to extreme weather events and cyber threats.
   - This contradicts the intent of SB 316, which **prioritizes modernizing the grid through storage and decentralized energy solutions** rather than expanding costly transmission.

The contradictions between the Maryland Piedmont Reliability Project (MPRP) and the environmental goals of SB 316 highlight a critical flaw in energy planning—one that prioritizes large-scale transmission over local energy resilience. Without the proposed amendments, SB 316 risks enabling policies that lead to **greater reliance on imported electricity**, including fossil fuel-generated power from neighboring states, rather than fostering a **self-sufficient, clean energy future for Maryland**. Expanding transmission infrastructure without proper safeguards does not guarantee cleaner energy—it merely expands the grid's capacity to carry power from distant sources, many of which remain heavily reliant on coal and natural gas. To truly achieve an **abundant, affordable, and clean energy** future, Maryland must ensure that investments in energy infrastructure prioritize **local generation, energy storage, and grid modernization** over indiscriminate transmission expansion. The following amendments are essential to prevent the unintended consequence of clean energy initiatives that inadvertently sustain out-of-state fossil fuel dependency while burdening Maryland's landscapes and ratepayers.

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 SB 316 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 SB 316 only if these amendments are adopted. Thank you for your time and consideration.

Respectfully submitted,

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