



Ella Ennis, Legislative Chairman  
Maryland Federation of Republican Women  
PO Box 6040, Annapolis MD 21401  
Email: eee437@comcast.net

The Honorable Brian J. Feldman, Chairman  
and Members of the Education, Energy and the Environment Committee  
Senate of Maryland  
Annapolis, Maryland

RE: **SB0256** – Environment - Building Energy Performance Standards Compliance and Report –  
**OPPOSE**

Dear Chairman Feldman and Committee Members,

The 1,154 members of the Maryland Federation of Republican Women oppose SB0256 because it will lead to increased costs and tax burdens for families and businesses and expand government bureaucracy.

The State of Maryland needs to decouple itself from blindly following California's environmental laws that resulted in rolling blackouts and outrageous utility bills. Maryland's climate is as diverse as its geography. Maryland needs multiple energy sources, including nuclear and natural gas. Promotion of "cold-climate" heat pumps must be postponed until they are proven effective and available commercially at a reasonable cost.

A building covered by SB0256 that exceeds the Energy Use Intensity (EUI) standard will be required to pay two separate fees -- an annual reporting fee to cover the government's cost to administer the program and an alternative compliance fee. Those additional assessments will lead to increased rents for multi-family residential buildings, healthcare facilities, and others at a time of high housing and utility costs.

The new alternative compliance fee will be deposited into the Maryland Strategic Energy Investment Fund, earmarked for loans to covered buildings for energy efficiency projects. The bill does not define those projects or require they be evaluated for efficacy. What happens if these measures are not sufficient to lower the energy use to meet the Energy Use Intensity (EUI) mandate? Will the loans be forgiven?



Ella Ennis, Legislative Chairman  
Maryland Federation of Republican Women  
PO Box 6040, Annapolis MD 21401  
Email: eee437@comcast.net

- 1) MDE's 2023 Baseline Data Sources & Modeling Methodology Impact Model listed 3 options to reduce energy use to meet targets:
  - a. Try to meet direct emissions target with efficiency.
  - b. Electrify space heating, water heating, other uses, until direct emissions target is met.
  - c. Reduce electric use until site energy use intensity (EUI) target is met.
- 2) Not meeting the EUI could lead to rationing of energy for a covered building, including multi-family housing and healthcare facilities, limiting energy for heating/cooling, cooking, appliances, computers, etc..
- 3) The official Building Energy Performance Standards Energy Use Intensity (EUI) has not yet been published on COMAR. The Department of the Environment website posts "unofficial" standards.
- 4) Requiring all buildings to be totally electric is not feasible today and is not likely to be feasible by 2030 or even 2035.
- 5) Forcing individuals, businesses, and healthcare facilities to comply or face financial penalties while exempting government buildings (including schools) is unfair.

It is difficult to determine the full impact of this legislation when the final standards are not yet available. The options above are overly simplistic and unrealistic when a large proportion of Maryland's energy is imported from coal- and gas-powered producers, providing no reduction in greenhouse gases. Maryland's power grid is grossly insufficient at this time with many years needed before the grid will be able to provide sufficient energy for an all-electric Maryland.

For all these reasons, please vote an **UNFAVORABLE** report for **SB0256**

Sincerely,  
Ella Ennis  
Legislative Chairman  
Maryland Federation of Republican Women