



**Testimony for: HB1532 - Continuing the Next Generation Energy Act**  
**Bill Sponsor: The Speaker and Chair Korman and Delegate Fraser-Hidalgo**  
**Committee: Environment and Transportation**  
**Organization Submitting: Maryland Legislative Coalition Climate Justice Wing**  
**Person Submitting: Dave Arndt– Co-Chair**  
**Hearing Date: March 3, 2026**  
**Position: Favorable with Amendments**

Dear Chair Korman and Committee Members:

Thank you for allowing our testimony today on HB1532. The Maryland Legislative Coalition (MLC) Climate Justice Wing, a statewide coalition of 32 grassroots and professional organizations focused on climate justice, supports HB1532 with some amendments. We hope we can work together to bring it to the Governor’s desk with some important consumer and environmental protection adjustments to the bill.

We support the HB1532 provision that lowers the maximum monthly energy demand that is required for a certain large load customer to qualify for a specific rate schedule from 100 MW to 25MW and support some provisions on Multiyear Ratemaking and EmPOWER Maryland. We recommend changes to the Power Plant Research Program as well. We do not support the provisions related to subsidies to nuclear generation. Our comments and recommended changes/removal of provisions are as follows.

#### Empower - Recommendations

We support the provisions that would consider transitioning the utility-implemented Empower program to a third-party and doing an assessment is a reasonable way to move forward. We too are concerned that utilities are not running EmPOWER in the most cost-effective way; however, the language in Section 7–225 (b) (6) could exacerbate this problem and potentially limit program offerings. We recommend that Section 7–225 (b) (6) be removed from the bill.

#### Multiyear Ratemaking -Recommendations

We support the bill language that will address the reconciliation process in multiyear rate plans (MYRP) by proactively preventing reconciliation through a “cost-sharing mechanism.” However, we are concerned that a “forecasted rate” process could increase rates based on projected spending. This would shift the financial risk from investors to ratepayers and could exacerbate project overspending and subject ratepayers to a possible reconciliation request. We recommend fully ending the reconciliation process by adjusting language to read “*a multiyear*

*rate plan or a rate plan that utilizes a future test year."* We also recommend fully prohibiting forecasted ratemaking.

#### Power Plant Research Program - Recommendation amend the section on suitable energy sites

In Section 3 of the bill we recommend stipulating that the 50 priority energy sites be limited to renewable energy generating stations or energy storage devices. We recommend this change, because most of the old or decommissioned generating sites are located in environmental justice areas that have been already overburdened with fossil fuel emissions and the associated negative health effects.

#### Nuclear - Recommendation to Remove

HB1532 has provisions that would subsidize nuclear energy to the detriment of ratepayers. In addition, implementing a procurement structure for new nuclear generation will not bring new generation to Maryland for years if not decades. Allowing a 15% cost overrun functions basically as a subsidy through an incentive to overspend. This bill sets the stage for further cost increases, which the original Next Generation Energy Act prohibited.

The Georgia Power Vogtle Units 3 and 4 took 15 years to build and cost \$36.8 billion, more than twice the project timeline and cost (see [costs for Georgia nuclear plant](#)). The Utah Associated Municipal Power Systems [NuScale Power](#) small modular nuclear reactor project was initially projected to cost \$3 billion and ultimately rose to \$9.6 billion at which point the project was shelved. Furthermore, a 2014 [academic study](#) looked at 180 nuclear power projects around the world and found 175 of them exceeded the initial budget by an average of 117% and took, on average, 64% longer to build. The levelized capital costs of electricity production from [nuclear is three times the cost of solar](#).

Another negative provision in the nuclear section of the bill is that it changes the definition of "Zero-Emissions Credit" to make it extremely vague and potentially far more expensive. HB1532 would price ZECs according to the reactor's "environmental impacts." This is not defined in the bill —i.e., how environmental attributes would be monetized. This was done in NY and has enabled the cost of ZECs to skyrocket, projected to reach \$2 billion/year under the 20-year extension the New York Governor just signed. Essentially, NY turned the Social Cost of Carbon from a way to evaluate the impacts of climate change that could be avoided into a way to force consumers to pay for huge subsidies to nuclear power plants.

Also, it is not even clear what will replace the original cost recovery mechanism for new reactors in the Next Generation Energy Act revisions. It seems like the new version of ZECs would be an additional subsidy on top of that; either that or it will create a huge loophole to make the ZECs cost whatever is needed to cover the reactors' costs, regardless of the approved cost limits.

We respectfully request the committee vote favorable with amendments and adopt our recommended changes to HB1532.

350MoCo  
Cedar Lane Unitarian Universalist Church Environmental Justice Ministry  
Chesapeake Earth Holders  
Chesapeake Physicians for Social Responsibility  
Climate Law and Policy Project  
Climate Communications Coalition  
Climate Parents of Prince George's  
Climate Reality Greater Maryland  
ClimateXChange  
Coming Clean Network, Union of Concerned Scientists  
DoTheMostGood Montgomery County  
Echotopia  
Elders Climate Action Maryland  
Fix Maryland Rail  
Glen Echo Heights Mobilization  
Greenbelt Climate Action Network  
HoCoClimateAction  
Howard County Indivisible  
Maryland Legislative Coalition  
Maryland Energy Advocates  
Maryland Third Act  
Mizrahi Family Charitable Fund  
Mobilize Frederick  
Montgomery County Faith Alliance for Climate Solutions  
Montgomery Countryside Alliance  
Mountain Maryland Movement  
Nuclear Information & Resource Service  
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Sierra Club Maryland Chapter  
Takoma Park Mobilization Environment Committee  
The Climate Mobilization MoCo Chapter  
Unitarian Universalist Legislative Ministry of Maryland