



MDV-SEIA

**Before the General Assembly of the State of Maryland  
Senate Education, Health, and Environmental Affairs Committee  
February 11, 2020**

**Testimony of David W. Murray  
Executive Director  
Maryland-DC-Delaware-Virginia Solar Energy Industries Association (MDV-SEIA)  
SB 281 "Renewable Energy Development and Siting (REDS) – Evaluations and Tax and  
Fee Exemptions"**

**FAVORABLE WITH AMENDMENTS  
WRITTEN ONLY**

Thank you for the opportunity to provide testimony on SB 281. My name is David Murray and I serve as Executive Director of MDV-SEIA, the local solar trade association representing over 4,500 solar installers, developers, manufacturers, and other solar workers in Maryland.

We applaud the efforts of the bill sponsors to incentivize renewable energy deployment on brownfields and sites not available for other commercial purposes. By waiving program application fees, solar developers have additional incentive to explore non-traditional sites for clean energy deployment. It is worth noting that solar development on brownfields is considerably higher and risks are considerably than many greenfield sites, thus efforts to reduce fees by approximately \$10,000 are a helpful step in addressing the cost disparity. MDV-SEIA strongly supports this provision of the bill, and encourages further efforts by legislators to spur clean energy deployment on contaminated sites.

However, SB281/HB336 adds redundancy and uncertainty to the Certificate of Public Convenience and Necessity (CPCN) process. The language referencing Section 2-115 (Public Utilities) would force a solar developer to reapply for a CPCN for “material” changes to their project, such as a change in the operation date. Solar development is a multi-year process, and developers often contend with these changes due to factors outside their control, such as a shift in injection capacity on the relevant transmission lines. The time and cost burden of needing to go back to the Public Service Commission several times would greatly inhibit solar deployment in Maryland and add redundancy to an already extensive and expensive process. Furthermore, there are already guardrails within the CPCN process that protect against the issues the bill is trying to address in this section. CPCNs already have a standard condition from the DNR Power Plant Research Program that requires projects to stay within the same “Limit of Disturbance” and general specifications as included in the CPCN application. Any changes require a CPCN amendment, and many projects have had to do make such amendments. Thus, MDV-SEIA proposes striking the additional language on Page 5, Line 19 through Page 6, Line 6.

Thank you for your consideration.