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**OPPOSED – House Bill 30**

**HB 30 - Public Utilities – Office of Climate Counsel – Establishment (Climate Counsel Act)**

Potomac Electric Power Company (Pepco) and Delmarva Power & Light Company (Delmarva Power) oppose House Bill 30 Public Utilities – Office of Climate Counsel – Establishment (Climate Counsel Act). House Bill 30 creates an Office of the Climate Council to evaluate matters before the Public Service Commission (PSC) to determine if the environmental interest of the state and its residents are affected by a variety of matters. The bill also gives the authority to the Office of the Climate Counsel to recommend legislation to the General Assembly on any matter related to PSC jurisdiction that may affect the environmental interests of the state and its residents.

While House Bill 30 appears to be an attempt to further the State's efforts to combat climate change, it is doing so in a duplicative manner. The Maryland Energy Administration has been actively involved in legislative and regulatory matters relating to climate change since its inception. In addition, the Maryland Department of the Environment, the Department of Natural Resources through its the Power Plant Research Program (PPRP) also weigh in on environmental policies at the PSC as well as during bill hearings before the Maryland General Assembly. The PPRP also participates in proceedings relating to applications for certificates of public convenience and advocates for conditions related to environmental impacts of those projects. In addition, the Attorney General's office has also weighed in on these matters. For example, both the Maryland Energy Administration and the Office of the Attorney General participated in the PSC proceeding adjudicating the merger between Exelon and Constellation (Case No. 9271) noting that investments in renewable generation would result in greater energy diversity, environmental and health benefits, and economic opportunities for the State. The Maryland Energy Administration was the primary proponent of the Governor's Office when the policy decision to support Offshore Wind came before the Maryland General Assembly. Creating another office to provide input on environmental issues is duplicative an unnecessary.

Each of these agencies, as well as many other stakeholders including environmental advocates, counties, and other municipalities, have expertise in the important issues related to climate change and environmental impacts. These stakeholders have demonstrated their ability to advocate for environmental and climate issues, and the Public Service Commission has experience with considering those views in making its decisions.

House Bill 30 is also duplicative in its authorization of this new office to hire experts in utility regulation, costs of capital, rate design, accounting, economics, engineering, and transportation. Each of these specialized areas of expertise are already housed within the PSC and the Office of

People's Counsel, both of which participate in all regulatory proceedings and many issues before the Maryland General Assembly. The existing advocacy of the organizations listed above is sufficient to protect the environmental and climate change interests of the people of Maryland. Finally, establishing an Office of Climate Counsel would cost customers additional dollars. This bill is simply not necessary given the breadth and type of entities that regularly participate in PSC proceedings advocating on behalf of the environmental community and, given that it will increase costs to customers, is inadvisable in the current economic environment.

For the above reasons Pepco and Delmarva Power respectfully oppose House Bill 30.

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