



Maryland General Assembly
Senate Finance Committee
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Testimony of Alexandra Wyatt
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SB83, an Act Concerning Utility Regulation – Consideration of Climate and Labor
Sponsor: Senator Kramer
Position: FAVORABLE

Thank you for the opportunity to provide testimony on SB 83, Utility Regulation – Consideration of Climate and Labor. My name is Alexandra Wyatt and I am Policy Director and Legal Counsel for GRID Alternatives, the nation’s largest nonprofit solar installer. Our affiliate GRID Alternatives Mid-Atlantic (GRID Mid-Atlantic) operates in Maryland, Virginia, and the District of Columbia, providing solar job training and no-cost solar installations to underserved and low-income customers. GRID Mid-Atlantic offers these comments in support of SB 83 and requests a **favorable** report in committee. We also suggest amendments that could make the legislation even stronger and more equity-focused.

GRID Mid-Atlantic’s mission is to build community-powered solutions to advance economic, environmental, and climate justice through renewable energy. We envision a rapid, equitable transition to a world powered by renewable energy that benefits everyone. For this transition to be achieved, it is essential that Maryland’s energy regulators be empowered and required to engage in reality-based analysis that (1) accounts for the true costs of climate change, especially for vulnerable populations, and (2) acknowledges the full impact of Maryland’s changing energy system on the state’s current and future workers. SB 83’s direction to the Maryland Public Service Commission (PSC) to consider climate and labor standards in its power plant approval decisions, research programs, and utility oversight and regulation would do much to promote this necessary future and better align the PSC with modern science and regulatory practice.

GRID Mid-Atlantic suggests that an even more holistic, and realistic, mandate would also expressly incorporate environmental and climate justice considerations. Greenhouse gas (GHG) emissions are not the only aspects of our fossil fuel-based extractive economy that harm Maryland’s economy and disproportionately harm Maryland’s most vulnerable communities and households. Other air and water contaminants affect Maryland residents’ health as well. GHGs, toxic pollutants, land use, high energy burdens, and other consequences of our energy system all contribute to racial and economic injustice that is just as urgent a problem for the families facing it as climate change. Fully accounting for these equity “co-benefits” of shifting away from fossil fuels can further strengthen the case for clean energy.



Maryland's neighbor, the District of Columbia, recently added mandatory considerations for its own Public Service Commission (and Office of People's Counsel) that more broadly reference "the District's public climate commitments," which are multifaceted and include building capacity to plan for equity in all energy actions and programs.¹ New York's Climate Leadership and Community Protection Act also contains strong equity and justice provisions for the state's State agencies, authorities and entities, including consideration of input from the state's environmental justice working group.² Maryland could build on these and other models to ensure that the factors that its PSC considers are appropriately comprehensive and equitable.³ Without additional language along these lines, PSC analysis will still have gaps, and vulnerable communities may not receive a fair benefit from the state's climate efforts.

Equity and justice can only be achieved with deliberate work, but they are essential to the success of Maryland's climate ambitions. Designation and consideration of disadvantaged communities, in a way that incorporates the input and expertise of those communities, could enable Maryland's climate and clean energy efforts to be more accountable on equity and justice. Meaningful consultation with those communities is also indispensable; being at the front lines of climate and energy crises means not only that these communities face their harms first and worst, but also that they have unique expertise around the solutions to these crises. Incorporating clear procedural and substantive equity standards among the PSC's mandatory considerations in its utility oversight and regulation would strengthen Maryland's climate action framework while building support and durability for the necessary policies.

GRID Mid-Atlantic is very pleased to see Maryland's leaders prioritizing climate ambition. We thank you for your consideration of SB 83, and we hope that you will advance it.

¹ D.C. Law 22-257. Clean Energy DC Omnibus Amendment Act of 2018; Clean Energy DC, the District of Columbia Climate and Energy Action Plan (2018), https://doee.dc.gov/sites/default/files/dc/sites/ddoe/page_content/attachments/Clean%20Energy%20DC%20-%20Full%20Report_0.pdf.

² See, e.g., N.Y. Consol. Laws, Envtl. Cons. L. § 75-0117.

³ Maryland's PSC considerations could, for example, cross reference Md. Code Ann., Envir. § 1-701 on Environmental Justice, or other provisions of law and/or official reports.