

OPPOSE
Economic Matters Committee
2/24/2022

House Bill 818 Electricity – Community Solar Energy Generation – Consolidated Billing

Baltimore Gas and Electric Company (BGE) opposes *House Bill 818 - Electricity – Community Solar Energy Generation – Consolidated Billing*. House Bill 818 authorizes a subscriber organization for a community solar energy generating system to participate in utility consolidated billing provided by the electric company serving the territory of the community solar energy generating system. The effective date of the legislation is July 1, 2022. Conceptually, BGE does not necessarily oppose the participation of subscriber organizations in utility consolidated billing but has some concern that the schedule provided is insufficient to accomplish the complex tasks required.

Subscriber organizations currently bill subscriber charges in parallel to the BGE billing process and House Bill 818 would allow the subscriber charges to be consolidated on the BGE bill. This customer convenience is in line with BGE's customer focus, but we share the concerns of others about transitioning too quickly. Certain implementation details would need to be addressed by the Maryland Public Service Commission (Commission). Additionally, modifications of utility billing systems can be costly, and adequate time should be provided for billing system modifications.

The Commission is currently working to implement Supplier Consolidated Billing (SCB), whereby a retail supplier will issue a bill that includes both supplier charges and utility charges. The current SCB workgroup has taken over 4 years so far to discuss and develop a path forward. There are many complex issues and system changes that must be carefully considered before implementing to ensure that customers are issued timely and accurate bills.

For the above reasons, BGE respectfully request an unfavorable vote on House Bill 818.