



February 24, 2022

112 West Street  
Annapolis, MD 21401

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

Potomac Electric Power Company (Pepco) and Delmarva Power & Light Company (Delmarva Power) respectfully oppose **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 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.

Under Maryland’s Community Solar Pilot Program, Community Solar Subscriber Organizations enroll individual customers as “subscribers” to their projects. Subscriber Organizations allocate a percentage of a supplier’s community solar project energy production to each subscriber and the subscribers, in turn, receive community solar bill credits on their utility bills based on their allocated share of power produced. In other words, the utilities’ consolidated bills include the credits for the percent of generation that they are enrolled in, but do not incorporate the fee from subscriber organizations, who send a standalone bill for these charges.

Pepco and Delmarva Power understand customers may prefer to pay a single bill when it relates to their utility charges. However, details of consolidated billing are complex and critical to the actual success of the program if implemented. It is important that any consolidated billing option keeps the customer experience at the forefront. While we support the idea of consolidated billing, there are several areas within this legislation that still need to be addressed, for example, how to manage customer nonpayment of bills that include a subscriber fee. Modifications of utility billing systems are costly, and adequate time would be required for any billing system modifications.

Pepco and Delmarva Power are committed to powering a cleaner and brighter future for our customers and communities. Our customers have more choices than ever before in receiving reliable, clean, affordable and innovative energy products, and we are committed to driving that progress. As part of our commitment, we support community solar as an opportunity for customers to benefit from solar energy and we look forward to working with the sponsors and stakeholders.

For the above reasons, Pepco and Delmarva Power respectfully request an unfavorable vote on House Bill 818.

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