



An Exelon Company

Position Statement

OPPOSE
Senate Finance Committee
1/26/2022

Senate Bill 11 Maryland Online Consumer Protection and Child Safety Act

Baltimore Gas and Electric Company (BGE) opposes *SB 11 Maryland Online Consumer Protection and Child Safety Act*. Senate Bill 11 would establish requirements for businesses that collect consumer information, including how or if information can be disclosed without the consumers consent. Consumer information applicable under this bill would include account information, social security numbers, driver license numbers and forms of tracking data, which could include electricity consumption data and other data by BGE for billing purposes, as well as data that could impact the security of Maryland's transmission and distribution grid collected by BGE.

BGE understands the concerns regarding data privacy breaches; however, Maryland has historically exempted utilities from providing customers with disclosure of sensitive information in order to protect disclosure of critical electric infrastructure information.

The process of how information that impacts critical electric infrastructure information is disseminated and to whom continues to evolve through an existing Cyber-Security Reporting Work Group regulatory process at the Public Service Commission. Any policy impacting critical electric infrastructure information must be developed in a way that does not add unnecessary risk to the electric system, while protecting the electric utility's ability to service the needs of its customers.

Rather than pursue varying and disparate state-by-state regulations to address consumer privacy issues, we believe a more efficient and productive approach is the existing efforts to develop a uniform federal policy regarding consumer privacy.

We look forward to working with the sponsors and stakeholders to ensure the security of Maryland's energy infrastructure remains resilient against cyber-attacks.

For these reasons, BGE urges an unfavorable vote on this bill.