



SB144 – Public Utilities - Energy Efficiency and Conservation Programs - Energy Performance Targets and Low-Income Housing

Testimony before Senate Education, Energy, and the Environment Committee

January 31, 2023

Position: Favorable with amendments

Dear Education, Energy, and Environment Committee Members,

My name is Ruth Auerbach, and I represent the 750+ members of Indivisible Howard County. We are providing written testimony today to **support with amendments SB144**, to achieve certain target energy savings. Indivisible Howard County is an active member of the Maryland Legislative Coalition (with 30,000+ members). We are grateful for the leadership of Senator Feldman for sponsoring this critical legislation.

Ensuring that low-income households receive assistance achieving energy saving is a necessity for environmental justice. However, we recommend three changes to add clarity to the bill and to increase the likelihood that the savings are real and not just a figment of the computation.

First, we recommend that the targets are based on average energy usage rather than gross energy usage. By using gross sales, the achievement of the targets could be significantly influenced by fluctuations in the number of households that are low-income and changes in the definition of which households are counted low-income for the purpose of the computation.

Second, the legislation is not clear about the comparison computation for years 2024, 2025, and 2026. Section 7-211.1(C) says that the comparison amount of sales in 2024-2026 should "REFLECT SALES ASSOCIATED WITH THE LOW-INCOME RESIDENTIAL CUSTOMER CLASS SERVED BY PROGRAMS ADMINISTERED BY THE DEPARTMENT;" Without being more specific about this computation, the targets could be achieved by the choice of formula, rather than real energy savings.

Third, we recommend clarifying 7-211.1(E)(2). This clause requires that "... EVERY 3 YEARS ... THE DEPARTMENT SHALL SUBMIT A PLAN ... THAT DETAILS PROPOSALS FOR ACHIEVING THE ENERGY SAVINGS ... TARGET UNDER SUBSECTION (B) OF THIS SECTION FOR THE 3 SUBSEQUENT YEARS." However, subsection (B) only gives targets for 2024, 2025, and 2026. Hence, targets for all future years must be added to subsection (B).

Thank you for your consideration of this important legislation. **We respectfully urge a favorable report on this bill with amendments.**

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