



March 6, 2024

Senate Education, Energy, and Environment Committee
Maryland General Assembly
Room 2 West
Miller Senate Office Building
Annapolis, Maryland 21401

Re: SB0861: Public Utilities – High–Energy–Use Facilities – Greenhouse Gas Emissions Reductions

Chair Feldman and Members of the Senate Education, Energy, and Environment Committee:

Thank you for this opportunity to comment on SB0861 regarding greenhouse gas emissions reductions for high energy use facilities such as data centers. I write to you today to share our support on behalf of the National Parks Conservation Association (NPCA). NPCA is a nationwide nonprofit, nonpartisan organization dedicated to protecting and enhancing America’s national parks for present and future generations. We are proud to have more than 1.6 million members and supporters nationwide, with more than 32,000 of those members in Maryland.

As proposed, SB0861 is an important and necessary step as Maryland seeks to attract the data center industry while also working to uphold its commitments under the Climate Solutions Now Act. Data centers require a tremendous amount of energy to operate, and proper regulation and oversight of this industry is vital to ensuring Maryland continues to meet its carbon reduction goals.

In Virginia, data centers are currently consuming more than 3.5 gigawatts of electricity, more than 2.5 times the generation capacity of the Brandon Shores coal-fired power plant. There, the state’s leading electric utility, Dominion Energy, is predicting demand to rise to approximately 13 gigawatts in 15 years¹, more than double the amount of energy consumed by New York City on an average day². This explosive energy demand is threatening state and regional climate goals, as more natural gas is planned to be brought online and coal-fired power plants delay retirement to meet this surging energy demand.

In Maryland, data center complexes have currently been proposed near Monocacy National Battlefield Park and the Chesapeake and Ohio Canal National Historical Park. At the Quantum Loophole site, the company’s leadership is estimating their data center complex alone will require

¹ Virginia State Corporation Commission eFiling, Rebuttal Testimony of Virginia Electric and Power Company, Figure 2, Filed 9/5/23, <https://www.scc.virginia.gov/docketsearch/DOCS/7%25h501!.PDF>.

² New York City, Mayors Office of Climate and Environmental Justice, [https://climate.cityofnewyork.us/subtopics/systems/#:~:text=NYC%20uses%20about%20the%20same,of%20power%20\(NYISO%202022\)](https://climate.cityofnewyork.us/subtopics/systems/#:~:text=NYC%20uses%20about%20the%20same,of%20power%20(NYISO%202022)).

upwards of 3,000 to 5,000 MW of energy at peak demand³. This estimate alone should cause members of the General Assembly concerned about meeting our climate goals to understand the urgency of putting safeguards in place for this industry. The significant air and climate pollution from these data center developments could harm the visitor experience for both tourism and outdoor recreation at Maryland's national parks, as well as damage sensitive habitat for wildlife. It is vitally important that Maryland gets this issue right the first time around.

SB0861 would take an important step towards reducing carbon pollution, supporting grid stability, and Maryland's renewable energy goals. Simultaneously, the General Assembly is considering legislation that would result in exempting data center diesel backup generator complexes and other potential impacts from being reviewed by the Maryland Public Service Commission for a Certificate of Public Convenience and Necessity (CPCN), which we are opposed to. SB0861 would put the state of Maryland on a path towards leading the nation in sustainable data center development, and we applaud Senator Karen Lewis Young for her leadership on this important issue.

The visitors to Maryland's national parks and the millions who live in surrounding communities deserve that every effort is made to address and mitigate the impacts that would result from scaling data center development in Maryland. We look forward to working with you to enhance Maryland's economy while protecting its national parks for current and future generations.

Thank you,

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³ Data Center Revolution Podcast; Episode 81 - "I'm going Nuclear" with Josh Snowhorn; February 8, 2024; https://www.youtube.com/watch?v=y_aF4RpIHAA