

November 24, 2024  
Via Electronic Filing

Andrew S. Johnston, Executive Secretary  
Public Service Commission of Maryland  
William Donald Schaefer Tower  
6 Saint Paul Street  
Baltimore, Maryland 21202-6806

Re: Case No.9665 - Distribution Systems Planning (DSP) II A Status Report (Report) ,  
Comments

Dear Mr. Johnston.

In June 2021, the Commission directed that a DSP be developed in Maryland for all the utilities considering the Jade Cohort Map. I participated in that DSP Work Group until resigning in mid 2024. The major issue that I had as a professional planner was and still is the following from the Report:

“G. Metrics Define and Use Consistent Metrics Block52  
No Action Recommended

During Phase II, the WG agreed on the need for metrics for various DSP-related areas and there was some initial agreement on ideas for metrics in several areas. However, given the short timeframe of this phase of the WG, we were unable to have meaningful discussions on the development of metrics. Therefore, the WG will need to address metrics at a later stage, either during or after the development of regulation. “

Metrics have been a continuing topic since 2021 and extensively discussed in Phase II. Discussions in the Work Group have centered on who provides the Metrics, where they come from, and how or if they should be included in a DSP. Basic to planning is the use of Metrics to establish a base line and subsequent measurement toward progress (or not) to Goals established in the Climate Solutions Now Act (CSNA). The utilities have consistently blocked any consideration of metrics in the DSP. FOR THAT MAJOR REASON, I RESIGNED FROM THE DSP WG. Any subsequent Rulemaking (scheduled for 2025) that does not include Metrics will, in my professional opinion, be doomed to successful implementation of the CSNA by 2031. It also precludes the Public Service Commission from a comprehensive view of measures being considered in the short, medium, and long term with their associated costs to reach 60% Green House Gas Reduction in Maryland by 2031.

The following is my resignation email dated August 16:

I reluctantly have decided to state the following from my perspective as a planner, consumer of both gas and electricity in MD, and as a former regulator of transportation planning at the Federal level. It appears that with over 150+ recipients (which keeps being added to) receiving information to this WG that it has become a spectator sport and reality TV. I see that same 5 + individuals at each meeting.

My observation is that both the playing field and goal posts have been moved by the Commission in Order 91256. After 3 years we have "The Commission will not opine on every area of consensus and non-consensus raised by stakeholders at this time." Consequential issues were raised in the April 30 Report and now we are back to square one for all intents and purposes. (We are now being asked to review again areas of non-consensus). Existing utility planning is opaque and continues to be siloed with no opportunity for utility customers to participate. PC44, Transforming the MD Grid, has been going on now for 8 years with little transformation done by the utilities. For example, the latest MRP proposed by BGE sought \$200M as their contribution to the CSNA by planting trees and electrifying their work truck fleet. It was rightly denied.

MD recently complained about the lack of information provided from PJM about the potential closing of Brandon Shores Generator in their plans and the knock on effects of up to a 25% increase in KWH rates for BGE customers. . FERC has taken note and now requires a 15 year horizon for all RTO Plans. Meanwhile, we accept 10 year plans from MD utilities.

As a volunteer, I am no longer willing to spend time with few decisions made on utility planning processes other than the acceptance of utilities saying "trust us, we know what we are doing" their Strawman. Our last meeting pointed up the continuing reactive nature of the utilities with their representatives not prepared to make decisions, "The utilities are going to look into/further consider the inclusion of item C (some type of metrics....)". I have heard this response too many times. Three years is a long time to debate issues and I am reminded of my 30 years in the Federal Government where issues kept being run around in circles with little resolution. The utilities after 100 years have the game down pat and they hold the on going trump card as a monopoly. The PSC as the Maryland regulator needs to make the tough decisions on utility planning components which in some cases will be criticized. However, they do have their Policy direction in the 2022 CSNA and they are utility regulators for Maryland.

We have a saying in the planning profession; With out a plan, any road will get you there, but it will not be pretty and it will be costly.

The PSC Chief Engineer has stated numerous times that DSP is crucial for progress to implement the Climate Solutions Now Act to reach 60X31. We are 2 years into reaching 60X31 with little progress due to a lack of a public and understandable utility planning framework with associated metrics to measure progress and outcomes. I expect based on the past DSP WG discussions that we will only see marginal changes in what may be required of the utilities.

I've met some talented individuals in this Work Group, but I am unwilling to continue to rehash issues that then do not get resolved. It is not worth my continued time investment. I therefore wish you all well.

Best,  
Paul Verchinski, Retired Director of Planning for the USDOT, Federal Transit Administration

Very truly yours,

/S/

Paul Verchinski, Zero Emissions Electric Vehicle Infrastructure Council representing  
the Public