

Letter of Information
Economic Matters Committee
2/20/2025

House Bill 640 – Certificate of Public Convenience and Necessity – Overhead Transmission Lines – Conservation Easements

Baltimore Gas and Electric Company (BGE) offers a Letter of Information for *House Bill 640 – Certificate of Public Convenience and Necessity – Overhead Transmission Lines – Conservation Easements*. Senate Bill 34 requires that in determining whether to grant a Certificate of Public Convenience and Necessity (CPCN) for an overhead transmission line over 69kV, the Public Service Commission (PSC) must consider impacts on properties subject to an existing conservation easement. The Bill also requires that CPCN applicants minimize impacts to properties subject to existing conservation easements, including consideration of alternative routes.

Maryland law requires approval from the PSC of a CPCN application before construction of an overhead transmission line designed to carry more than 69kV may begin. The CPCN process before the PSC involves robust, quasi-judicial administrative proceedings, as well as extensive public notification requirements, public hearings, and opportunities for public comment. The CPCN process also allows for input from the public and from multiple State agencies, as well as local jurisdictions. For example, the Power Plant Research Program in the Department of Natural Resources coordinates a comprehensive environmental and socioeconomic review of a proposed project and presents recommendations on behalf of seven different State agencies. The Staff of the PSC and the Office of People's Counsel also regularly participate as parties in CPCN proceedings.

An alternative routes analysis is already required as part of the CPCN process for new overhead transmission lines. The alternative analysis requirement involves thoroughly evaluating and presenting various potential routes for the proposed power line, considering factors like environmental impact, land use, community impact, and cost, to demonstrate that the proposed route is the most feasible and minimizes negative effects compared to other options. A significant component of the analysis involves environmental and socioeconomic considerations, such as land use impacts. The impact of each alternative route on natural habitats, sensitive ecosystems, and visual aesthetics are just some examples of the environmental matters reviewed. Additionally, community impact is evaluated during the alternative analysis study. Factors such as property values, land use, and community concerns are strongly considered when identifying the most viable route for the transmission line. The CPCN process also currently requires that

BGE, headquartered in Baltimore, is Maryland's largest gas and electric utility, delivering power to more than 1.3 million electric customers and more than 700,000 natural gas customers in central Maryland. The company's approximately 3,400 employees are committed to the safe and reliable delivery of gas and electricity, as well as enhanced energy management, conservation, environmental stewardship and community assistance. BGE is a subsidiary of Exelon Corporation (NYSE: EXC), the nation's largest energy delivery company.

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Position Statement

applicants identify whether the overhead transmission line is proposed to be constructed on property that is subject to an existing easement.

Since analysis for alternate routes and consideration of impacts on properties with existing easements is already an essential requirement of a CPCN, *House Bill 640* is not needed. BGE is including a sample of its alternative analysis submitted to the PSC as part of BGE's CPCN application for the Brandon Shores Retirement Mitigation Project to demonstrate the substantial evaluations that are prepared when considering alternative routes.



BGE RPM-1 - BSRM
Alternate Route Stu

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