



February 28, 2025

**Economic Matters Committee
Maryland House of Delegates**

**Education, Energy, and the Environment Committee
Maryland Senate**

**HB 1035 & SB 937
Next Generation Energy Act**

**Katie Mettle
Policy Principal, Advanced Energy United**

UNFAVORABLE

Dear Chair Wilson, Chair Feldman, and esteemed members of the Economic Matters and Education, Energy, and the Environment Committees:

Advanced Energy United is an industry association that represents companies operating in the clean energy space. Our mission is to accelerate the transition to a 100% clean energy economy that is free from fossil fuels. Our members represent the full suite of technologies that are powering this transition. They include, but are not limited to, companies which manufacture, install, and maintain batteries and solar panels, as well as wind turbines, geothermal systems, EVs, EV chargers, and smart grid technologies.

We appreciate that HB 1035 and SB 937 will create an expedited CPCN process for renewable energy generation when paired with at least some types of battery storage, and for all projects that have cleared the PJM interconnection queue, or are still in the queue as of January 1st of this year.

However, on behalf of our member companies and in alignment with our mission to decarbonize the economy, we respectfully request the following amendments to HB 1035 and SB 937:

1. In 7-1201 (B) (1), add to the definition of “dispatchable energy generation” storage that exceeds 10 hours. PJM’s most recent ELCC class ratings do not include any storage greater than 10 hours.
2. In 7-1201 (B) (2), specify that “lower greenhouse gas emissions profile than coal or oil energy generating stations” includes a lifecycle assessment of greenhouse gas emissions each for coal, oil, and proposed dispatchable energy generation. For methane emissions, the calculation of carbon dioxide equivalent greenhouse gas emissions should use the value for its 20-year global warming potential.
3. Section 7-218 (D) in the Renewable Energy Certainty Act (HB 1036 and SB 931) requires notification of an application for a solar energy generating station over 2MW be provided to multiple governing bodies and members of the General Assembly, as well as to every resident and property owner within 1 mile of the proposed location. We request that section 7-218 (D) in the Renewable Energy Certainty Act (HB 1036 and SB 931) be duplicated for dispatchable gas and/or nuclear energy generation under HB 1035 and SB 937.
4. Section 7-218 (E) in the Renewable Energy Certainty Act (HB 1036 and SB 931) requires public meetings for a solar energy generating station over 2MW that is proposed to be located within an overburdened and underserved area. We request that Section 7-218 (E) in the Renewable Energy Certainty Act be duplicated for dispatchable gas and/or nuclear energy generation under HB 1035 and SB 937.
5. In 7-1204 (1), define that a biofuel shall only qualify as “zero-emissions” using a lifecycle greenhouse gas emissions approach.
6. Under 7-1204 (1), mandate that a natural gas energy generation station include carbon capture and storage in order to qualify for the expedited CPCN process.
7. Under 7-1210 (4), include in the cost-benefit analysis for an application for a nuclear energy generation project a comparison of the proposed nuclear energy generation project to all other energy generation sources that qualify for the expedited CPCN, including renewables paired with battery storage. The comparison

shall include every item listed under 7-1210 (4), plus estimated time elapsed until the new energy generation will come online.

8. Strike the requirement in 7-1217 that electric companies purchase any nuclear energy, let alone a specific amount.

We respectfully request the Committee issue an unfavorable report, unless the amendments we have proposed are incorporated into the bill.

Thank you for your time and consideration.

Best Regards,

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