(SB675) HB1149 Pavlak FWA

Public Service Commission – Full Costs and Benefits Analysis of Sources of Electricity Generation

CHANGE THE BILL TO A FACT-BASED ENGINEERING STUDY BY REPLACING ALL INSTANCES OF THE PHRASE "FULL COSTS AND BENEFITS" WITH "RELATIVE GENERATION COST AND EMISSIONS"

- Decisionmakers need to see an objective comparison of the cost and GHG emissions of different generator combinations.
- The word "benefits" inserts political opinion like the social cost of carbon. The only benefit that should be of interest at this point is GHG emissions

REPLACE SECTION 1.(a) WITH THE FOLLOWING:

1.(a) The Public Service Commission shall conduct a concept analysis of relative costs and emissions from reliable generation systems. A concept analysis keeps-it-simple with the following assumptions:

- (1) Legacy free, the base ignores existing infrastructure, policy and markets
- (2) All new construction with unit costs and financial assumptions, latest NREL/ATB database, R&D case (no subsidies, financial assumptions), tech life capital recovery period.
- (3) Perfect transmission and distribution (no loss, no cost, the copper plate assumption).
- (4) Closed system, no imports/exports across state boundaries. {Of course, Maryland has interstate transmission, but this unnecessarily complicates a relative comparison of generator types}
- (5) 10 years historical hourly renewables resource data from reanalyzed wind and insolation data sets. Empirical power curves convert wind and isolation to hourly electricity generation profiles.
- (6) Concurrent historical load profiles (level historical load growth).
- (7) Hourly dispatch assuring that the load is balanced every hour

CHANGE THE FOLLOWING TEXT IN SECTION 1.(b)(3) "use <u>a validated</u> the Levelized Full System Cost of Electricity model to analyze the costs of meeting the State's electricity needs from:"

• Let the PSC choose or develop the best model to accurately represent intermittency as described in section 1.(a) above.

ADD THE FOLLOWING SCENARIOS TO SECTION 1.(b)(3)

- (iv) Nuclear plus combustion turbine fueled by natural gas or hydrogen or biofuels
- (v) Any other scenario recommended by the PSC

