



February 21, 2025

112 West Street
Annapolis, MD 21401

Oppose – House Bill 1233 - Community Solar Energy Generating Systems - Subscription Eligibility

Potomac Electric Power Company (Pepco) and Delmarva Power & Light Company (Delmarva Power) respectfully oppose HB 1233- Community Solar Energy Generating Systems - Subscription Eligibility. House Bill 1233 Authorizes a certain low- and moderate-income (LMI) subscriber to hold a subscription to a community solar energy generating system located in a different electric service territory from the one in which the LMI subscriber resides, provides that a certain LMI subscriber shall receive the same bill credit value as an LMI subscriber who resides in a certain electric service territory, and requires the Public Service Commission (PSC) to establish a process for exchanging community solar bill credits between systems located in different electric service areas.

Pepco and Delmarva Power are powering a cleaner and brighter future for our customers and communities. Today, our customers have more choices than ever before in receiving reliable, clean, affordable and innovative energy products, and we are committed to driving that progress. As part of our commitment, we support community solar as an opportunity for customers to benefit from solar energy. While Pepco and Delmarva Power recognize the tremendous benefits of the community solar energy program in providing renewable energy options to Maryland customers, we have significant concerns about this legislation.

Pepco and Delmarva Power are concerned about the technical implications of this bill. To create a mechanism to settle energy in one PJM Zone and credit at a different rate will not work. Even if energy prices are slightly different, short falls/win falls would be created with no way to properly credit a subscriber. There would be jurisdictional issues associated with the recovery of the credit value and for load settlement. With the solar export benefitting the service territory of one electric company and the subscriber credit issued in a different service territory at a different electric company's rates, the value of the credit would be inappropriately funded by customers in the subscriber's service territory who did not benefit from the generated solar. Currently, a subscriber can already be assigned to multiple community solar facilities in Maryland as long as they are in their service territory. A mechanism to create a system to try and allow customers to subscribe to another community solar energy generating system located in a different electric service territory would be incredibly costly.

Pepco and Delmarva Power respectfully oppose House Bill 1233 and look forward to continuing conversations with the bill sponsor and all stakeholders involved.

Pepco Holdings, the parent company of Pepco, an electric utility serving Washington, D.C., and suburban Maryland; Delmarva Power, an electric and gas utility serving Delaware and portions of the Delmarva Peninsula; and Atlantic City Electric, an electric utility serving southern New Jersey. Anthony and his team are responsible for guiding the company's delivery of reliable and excellent service to more than two million customers in the Mid-Atlantic. Pepco Holdings is a subsidiary of Exelon Corporation, one of the nation's leading energy services companies.

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