

Delegate C.T. Wilson,
Chair, House Economic Matters Committee
6 Bladen St, Taylor House Office Building
Annapolis, Maryland 21401

HB1036

Dear Chair Wilson,

Solar Landscape supports HB1036, sponsored by the Chair. The bill furthers Maryland's clean energy goals by encouraging solar development across all market segments and by increasing savings for residents—especially low- and moderate-income households. We urge a favorable report.

Founded in 2012, Solar Landscape has delivered solar energy benefits to more low- and moderate-income households than any other community solar developer in the nation. We specialize in commercial and industrial rooftop solar, partnering with real estate owners in Maryland, New Jersey, Illinois, and beyond. We have leased or hold exclusive rights to over 150 million square feet of rooftops, including space for more than 50 community solar projects in Maryland. We remain committed to helping Maryland meet its renewable energy targets and advance energy equity.

Community solar adds clean energy to the grid while saving Marylanders money. HB1036 includes an automatic enrollment option that allows local governments to partner with community solar projects to enroll residents for guaranteed savings on their electricity bills, making the financial benefits of solar energy more accessible and effective. This is particularly beneficial for low- and moderate-income households.

Automatic enrollment addresses time, resource, and knowledge barriers, promoting equity for low-income households and renters. By simplifying enrollment, automatic enrollment would lower costs for community solar projects, thereby incentivizing more community solar projects (which is good for Maryland's grid and environment) and increasing community solar savings (which is good for Maryland households).

Participation in community solar does not hinder residential rooftop solar use. The program permits dual enrollment in both community solar and residential solar. For example, an automatically enrolled community solar household receiving a 10% reduction in their utility bills through community solar would still be able to achieve substantial savings from installing residential rooftop solar. In short, an opt-out community solar program would have no negative impact on the residential solar industry. Instead, opt-out community solar would bring additional savings to Marylanders who are able to participate in residential rooftop solar while also providing savings to Marylanders who cannot participate in residential rooftop solar (e.g., homeowners with incompatible roofs and renters, including many low-income households). Both options complement each other by expanding access to clean energy while preserving customer choice.

Automatic enrollment also leaves a role for community solar subscriber brokers (i.e., companies that currently earn a commission by acquiring and selling customers for community solar projects). Brokers can continue their traditional customer acquisition methods (e.g., door-knocking campaigns) for projects and localities that do not participate in automatic enrollment; and brokers are well suited to partner with

local governments to identify, enroll, and manage community solar customers more efficiently in opt-out programs. Additionally, Solar Landscape supports an amendment that protects current community solar subscribers from being enrolled in automatic enrollment projects, such that automatic enrollment would have no negative impact on transactions already closed by brokers. In sum, automatic enrollment would reduce project costs and thereby increase savings for low- and moderate-income households by removing traditional, costly barriers to entry, while simultaneously enabling brokers to expand their operations to higher value tasks.

Finally, automatic enrollment is not community choice aggregation. Community solar offers a fixed, guaranteed discount on electricity, with no temporary teaser rates (i.e., community solar participants by law must save on electricity compared to if they did not participate). Additionally, utility customers can join community solar while participating in community choice aggregation where it exists, or buying from a retail electricity supplier, as credits help offset supply costs. And because these projects are in Maryland, subscribers also support local clean energy generation.

Automatic enrollment will increase savings for residents, reduce project costs, and drive more community solar development. Our internal studies show that building and activating 500 MW of community solar within a year would generate approximately 4 million work hours—equivalent to 2,100 full-time jobs. Passing HB1036 demonstrates Maryland's commitment to sustainability, job creation, and economic relief for its most vulnerable residents. We commend the Chair and the committee for their leadership on clean energy and look forward to working together to secure energy access and savings for all Marylanders.

For questions, please contact Jason Weintraub at (410) 963-3674 or jweintraub@gfrlaw.com.