

February 20, 2025

112 West Street  
Annapolis, MD 21401

**Oppose – House Bill 645 – Transmission Line Siting – Comprehensive Plan, Recommendation, and Reporting Requirements**

Potomac Electric Power Company (Pepco) and Delmarva Power & Light Company (Delmarva Power) respectfully oppose **House Bill 645 – Transmission Line Siting - Comprehensive Plan, Recommendation, and Reporting Requirements**. House Bill 645 requires each county and Baltimore City to update its comprehensive plan to include an electric system planning element for purposes of minimizing the impact of future transmission line development in the State. The bill also requires each electric company serving a county or Baltimore City to report to that county or the City regarding the electric company's compliance with certain provisions of the county's or City's electric system planning element and requires each electric company to submit a report on electricity demand each year.

The bill requires the planning commission for a charter county to include an electric system planning element in its comprehensive or general plan. Electric system planning is a complex process that requires personnel trained in system planning to use industry practices and their engineering judgment to determine the distribution system investments that are required to continue to provide customers the safe and reliable service that they expect and deserve. This bill would limit the utilities' ability to use their expertise and professional judgement to continue to plan the system in a way that allows them to provide safe and reliable service for their customers. The limitations in this bill have the potential to raise the cost to customers because the utilities may be restricted from constructing transmission lines in the way that provides the most value to the customers. Moreover, imposing planning criteria on utilities may limit their ability to optimize the grid for electrification and integration of DER as flexibility provides more room for innovation that benefits the customers.

Additionally, some of the provisions in the legislation are duplicative of certain utility planning and reporting requirements that already exist in law. For example, utilities are already required to report on long-term plans annually to the Public Service Commission (PSC). The Ten-Year Plan, which is a compilation of information pertaining to the long-range plans of Maryland's electric companies—is submitted annually by the Commission to the Secretary of the Department of Natural Resources in compliance with §7-201 of the Public Utilities Article. The report also includes discussion of selected developments that may affect these long-range plans. Also, provisions in the bill that require consideration of the use of existing transmission line right of way rather than new lines, already exists in the CPCN law, under PUA §7-209.

Finally, the PSC has the expertise and statutory obligation under PUA §7-207 to determine the routing of overhead transmission lines. The PSC has a state-wide perspective and state-wide responsibilities with regard to energy policy and decision making, a perspective necessary to make certain that transmission siting through multiple utility territories and throughout the various counties in MD is cohesive. Under current law, the PSC is required to give local concerns due consideration, however final action rests with the PSC. The authority over siting transmission lines should continue to rest with the PSC.

Pepco and Delmarva Power respectfully request an unfavorable report on House Bill 645 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.