

November 26, 2024
Via Electronic Filing

Andrew S. Johnston, Executive Secretary
Public Service Commission of Maryland
William Donald Schaefer Tower
6 Saint Paul Street
Baltimore, Maryland 21202-6806

Re: Case No.9665 - Distribution Systems Planning (DSP) , Utility Reports (Reports)
dated November 15, 2024 , Comments

Dear Mr. Johnston.

The enabling legislation for the DSP is included in the Climate Solutions Now Act of 2022 (CSNA). Specific to the CSNA is Subtitle 8 Electric Distribution System Planning under which Section 7-802 requires the Commission to provide Reports by December 1 starting in 2024.

I have reviewed these Reports and am concerned that Section 7-801 was not addressed as part of the Reports. Section 7-801 provides the context for the Reports by providing Overarching Goals “that the electric distribution system support”. It can not be ignored. The utilities have addressed the Specific Goals in Section 7-802 **solely by listing projects** with out any discussion of how they relate to the Overarching Goals in the plain language of Subtitle 8, Section 7-801.

Very general assertions are made such as by BGE on page 1 of their report “ The CSNA Report provides a comprehensive overview of these initiatives and their expected impacts on achieving a more sustainable environment” I would submit that only reporting on projects with no context per Section 7-801 is not a DSP and is not comprehensive. Where are the metrics for the Reports project impact on: “Greenhouse Gas Reduction, Renewable Energy, Decreasing dependence on electricity imported from other states, and achieving energy distribution resiliency, efficiency, and reliability and for the more specific goals under Section 7-802? There are none.

Further the plain language of Section 7-802 directs that “information regarding the electric distribution system evolution, including information on electric distribution system planning processes” be provided to the Maryland General Assembly. No DSP information has been provided in my opinion that deals with evolution in the Reports. What is the current baseline that each utility currently follows? My understanding based on the 10 year utility plans submitted to the Public Service Commission is an approach that deals with annual Summer and Winter Peak Loading and its mitigation using traditional mitigation measures.

Two years have passed since adoption of the CSNA to produce these Reports with little evolution. PC 44 was initiated in 2016 to transform the distribution grid , 8 years ago

with little evolution in DSP. This DSP Business As Usual needs to be highlighted in any commission report under Subtitle 8. This lack of substantive progress in DSP does a disservice to customers since we need a speeded up transition to transportation and building electrification that requires a new DSP planning paradigm beyond just listing projects.

Very truly yours,

/S/

Paul Verchinski, Zero Emissions Electric Vehicle Infrastructure Council representing the Public