**TESTIMONY IN SUPPORT OF HB 827 (002).pdf**
Uploaded by: Cara Woolston
Position: FAV

**TESTIMONY IN SUPPORT OF HB 827**
**Solar Energy – Distributed Generation Certificate of Public Convenience and Necessity**

House Economic Matters Committee
March 13, 2025

Chair Wilson, Vice-chair Crosby and Members of the Committee

Thank you for the opportunity to testify before you on HB 827: Solar Energy – Distributed Generation Certificate of Public Convenience and Necessity. This bill will establish the Distributed Generation Certificate of Public Convenience and Necessity (DG-CPCN), a new certification process required for constructing and operating solar energy projects (2-5 MW) in the State of Maryland. This new process is designed to streamline the development of renewable energy infrastructure while ensuring environmental protection and public safety.

## What's the Problem That This Bill Fixes?

Two years ago, I sponsored legislation making the Community Solar Program (CSP) permanent in Maryland. Those projects are being implemented and we are poised to be a leader in that arena. HB 827 builds off the success of the CSP and serves to work in conjunction with that legislation. While we provided additional incentives in 2023 to build community solar on rooftops, brownfields, industrial zones and parking lots, the truth is, community solar will also need to be constructed on the ground.

According to the Power Plant Research Program (PPRP), which conducts the initial CPCN review, they are anticipating nearly 60 CSP applications in the next few months – just two years ago, PPRP reviewed only 7 CPCN applications. According to the Coalition for Community Solar Access (CCSA), which has polled its members, there are 130 more community solar projects under development that will require a CPCN application.

Under current law, 2-5 MW community solar projects must go through a CPCN process that was initially designed for large-scale power plants. For reference, the CPCN process was originally created through the Power Plant Siting Act of 1971 in response to concerns over the ability of the State to provide significant technical review of the impacts of the proposed Calvert Cliffs nuclear plant. However, this comprehensive review process does not make sense for smaller community solar projects which are usually sized between 2-5 megawatts. While the current CPCN review is valuable for ensuring high standards for new power plant projects, the rise in community solar projects may in fact overburden state agencies and developers with unnecessary roadblocks.

## The Solution

HB 827 would require the Power Plant Research Program (PPRP) to develop standard siting and design requirements for community solar projects and submit it to the Public Service Commission (PSC). These requirements must be in line with the State's renewable energy commitments, incorporating environmental preservation, reasonable setbacks, landscape screening, and strict adherence to stormwater management, erosion control, and site stabilization. Additionally, these projects are required to ensure public safety, follow industry

best practices, and comply with specific licensing conditions previously established by the Commission for solar energy generating systems. This process would be developed in collaboration with local governments, agricultural interests, environmental advocates, and the solar industry. Once these regulations are adopted, DGCPCNs will be issued after a review by the PSC.

HB 827 should work well with the Chairman's HB 1036, which would set certain siting standards for all solar projects. My legislation will likely lead to more stringent siting standards, which will be developed through a collaborative process with many stakeholders, in exchange for a more expedited path to obtaining a CPCN. If both HB 1036 and HB 827 pass, then community solar developers would have the choice to apply for a traditional CPCN under the new siting standards envisioned in the Chairman's bill or for a more expedited CPCN with more stringent siting standards under my bill.

The benefits of this bill are clear:

1. Streamlining the CPCN process for community solar projects will accelerate the deployment of clean energy, contributing to Maryland's climate and renewable energy goals.
2. By establishing clear, standardized requirements, we reduce uncertainty for developers and simplify participation for counties and interested parties, ultimately making the development process more efficient and predictable.
3. By facilitating the inclusion of more community solar projects that can serve low-and moderate-income families, we reinforce our commitment to equitable access to renewable energy.

HB 827 does not circumvent local governments or other interested parties, it includes them in the decision-making process as we seek to identify certain standards, based on stakeholder input and industry best practices, for these smaller power generating projects uniformly across all 24 jurisdictions. In fact, this bill with proposed amendments, which were development with input from the PSC and PPRP, has the support of MACo, CCSA, CHESSA, SEIA, and the environmental community.

This bill will help guide solar development in Maryland and ensure that the community solar projects can be constructed in a timely manner so we can accomplish the equity, energy, and economic benefits promised by the legislation this body has already passed.

For these reasons, I am requesting a favorable report on HB 827, as amended.

**CCSA testimony_HB 827_3-13-2025.pdf**
Uploaded by: Charlie Coggeshall
Position: FAV

1380 Monroe Street NW, #721
Washington, DC 20010
720.334.8045
info@communitysolaraccess.org
www.communitysolaraccess.org

RE: HB 827 – Public Utilities - Distributed Generation Certificate of Public Convenience and Necessity

**Favorable**

Chair Wilson and members of the House Economic Matters Committee,

The Coalition for Community Solar Access (CCSA) provides this written testimony regarding House Bill (HB) HB 827. CCSA's position on this legislation is Favorable.

CCSA is a national, business-led trade organization, composed of over 100 member companies, that works to expand access to clean, local, affordable energy nationwide through the development of robust community solar programs. Community solar projects involve medium-scale solar facilities that are shared by multiple community subscribers who receive credit on their electricity bills for their share of the power produced.

CCSA has been an active participant in the development and implementation of Maryland's community solar pilot program, and we are grateful to this Committee for supporting the passage of HB 908 in 2023, which made community solar a permanent solution in Maryland. As a result, community solar will play a critical role in helping the state meet its energy requirements while also ensuring electricity cost savings for those that need it most, ensuring at least 40% of all capacity benefits low-and-moderate income customers.

CCSA is witnessing firsthand through its members the excitement and growth of industry interest for community solar in Maryland due to this Committee advancing a permanent program in 2023. While the table is largely set at the regulatory level for launching the permanent program, the challenge now is to address barriers and bottlenecks outside of that process, of which siting is the greatest. CCSA applauds the Senate and House Leadership for taking up this thorny issue, and we support SB 931 and HB 1036 which establish siting standards for solar and storage systems. HB 827 builds on the direction of the Leadership bill by providing a narrower solution specific to siting and administrative challenges for community solar projects that require (between 2-5 megawatts) a Certificate of Public Convenience and Necessity.

**HB 827 sponsored by Chair Clippinger and Delegates Charkoudian and Fraser-Hidalgo would:**

1) Create a "Distributed Generation Certificate of Public Convenience and Necessity" ("DGCPCN") that can be issued by the Public Service Commission ("Commission") for qualifying community solar projects that are over two megawatts but not greater than five megawatts;
2) Require the Power Plant Research Program ("PPRP") to leverage public comment and develop proposed standard siting and design requirements and standard licensing conditions associated with the issuance of a DGCPCN in consultation with stakeholders;
3) Require the Commission to consider the PPRP proposal before adopting regulations and implementing the final siting and design requirements and licensing conditions, and for the Commission to specify the application and procedure for processing a DGCPCN; and

1380 Monroe Street NW, #721
Washington, DC 20010
720.334.8045
info@communitysolaraccess.org
www.communitysolaraccess.org

4) Require the Commission to provide an opportunity for public comment and to hold a public hearing (in the county where the project is located or virtually) before considering a DGCPCN application.

HB 827 would create a DGCPCN that is more efficient and expedited relative to the standard CPCN process. However it would only be available to qualifying community solar projects that meet the predetermined standards established by the PPRP and PSC. Projects that do not meet those standards would be defaulted to the more extensive CPCN process.

CCSA appreciates Chair Clippinger and Delegates Charkoudian and Fraser-Hidalgo for championing HB 827, particularly two years after sponsoring HB 908. HB 827 is a logical next step to enabling the continued growth and expansion of community solar in Maryland, as envisioned with the passage of HB 908. HB 827 addresses critical gaps in the CPCN process, while reducing barriers to development, creating efficiencies for state agencies, and driving community solar siting and design that meets state standards.

**The current CPCN process is misaligned with community solar project type and volume.**
Projects above 2 megawatts fall within the permitting jurisdiction of the state via the Commission's Certificate of Public Convenience and Necessity (CPCN) process, which was originally created through the Power Plant Siting Act of 1971. The CPCN was established as a means for conducting comprehensive reviews of proposed power generating and transmission facilities. It involves a wide range of subjective and open-ended review factors, which necessitate a lengthy evidentiary process before a judge for each CPCN application, potentially exceeding one year per application. If there is a disagreement amongst parties, the case is set for litigation involving testimony, in-person trials, and legal briefs (sometimes exceeding 60 pages), followed by a complex written order from the Commission. The process makes sense for the review and consideration of unique utility-scale generation and infrastructure projects, which can differ substantially in technology and complexity.

In 2022, the community solar project size cap increased from 2 megawatts to 5 megawatts, which is consistent with most other community solar markets. Community solar projects above 2 megawatts and up to 5 megawatts must obtain a CPCN. However, the CPCN process is misaligned with the review needs of most community solar projects which are modest in size and typically similar in design. As a result, the CPCN process creates an outsized burden for community solar developers, as well as for the state agencies involved in the review and approval process. For developers, it represents a significant time and cost investment that may deter development. For Maryland agencies, it represents a major administrative challenge managing the rising flood of CPCN applications driven by demand tied to the new permanent community solar program. As an example, prior to 2024, the PPRP and Commission reviewed 63 solar CPCN applications and approved 49 over a thirteen-year period. Yet, in the past twelve months alone they've received 33 applications and are aware of 27 forthcoming applications (i.e., 60 applications total). Further, an internal CCSA polling of its members indicates there are at least 130 more community solar projects under development that will require a CPCN application.

**HB 827 will right size the permitting process for small solar projects and create administrative efficiencies that can respond to the influx of CPCN applications**.
As noted, CCSA members have indicated there are at least 130 CPCN eligible community solar projects under development additional to the current heavy load already being experienced by the PPRP. The current CPCN

1380 Monroe Street NW, #721
Washington, DC 20010
720.334.8045
info@communitysolaraccess.org
www.communitysolaraccess.org

review process was not designed to handle this level of volume. It treats each new CPCN application on a case-by-case basis, and because there are no design or siting standards, there can be significant variability from application to application. In addition, there can be extensive back and forth between the project and PPRP when trying to achieve a tailored solution to any issue, as well as a resource-intensive litigation process.

HB 827 would result in a front-loading of work by the PPRP and Commission to establish standard siting and design requirements and licensing conditions, that would in turn reduce the ongoing time and resource needs associated with the increased volume of applications. The standards would reduce project variability and provide the PPRP and Commission with more objective measures for determining whether a community solar project qualifies for a DGCPCN. This will not only make it easier for PPRP to review projects but also reduce the amount of back and forth that may occur between PPRP and a project.

If the project does qualify for DGCPCN it can avoid the current litigation process and instead go directly to the Commission for consideration (with public comment). Conversely, if a proposed project does not meet the DGCPCN requirements it will be defaulted to the more extensive CPCN review for a deeper individual analysis. As such, the DGCPCN option is analogous to a District Court, versus what is required in the regular CPCN process, which is akin to Circuit Court.

**HB 827 will drive solar development toward State-approved siting and design standards.**
HB 827 tasks PPRP to lead the development of standard siting and design requirements and licensing conditions that will be used for determining whether a community solar project is eligible for a DGCPCN. In developing those standards, the PPRP will leverage county input and public comment, and consider a range of factors, from the state's clean energy commitments to reasonable setbacks and landscape screening requirements, to industry best practices. The Commission will then use that input to develop regulations associated with the DGCPCN.

The standards that result from this robust process will provide a clear signal to the market, and in turn drive the development of projects that meet the DGCPCN requirements. The public comment opportunities in the PPRP and Commission processes ensure there is broad stakeholder buy-in to the resulting standards, and in what is ultimately considered an acceptable community solar project sized between 2-5 megawatts.

**CCSA urges a favorable report on HB 827 to reduce barriers to community solar development, create efficiencies for state agencies, and accelerate community solar deployment that meets preferred siting and design standards. Taken together, the solutions in HB 827 along with the siting standards established though Leadership's SB 931 and HB 1036, will make Maryland a national model on solar siting, while most importantly increasing the scale and pace for deployment of much-needed clean energy in the State.**

Sincerely,
Charlie Coggeshall
Mid-Atlantic Director, CCSA
charlie@communitysolaraccess.org

**HB827_TPE_Fav_dgcpcn.pdf**
Uploaded by: David Murray
Position: FAV

March 13, 2025

Honorable C. T. Wilson, Chair
Honorable Brian Crosby, Vice Chair
Economic Matters Committee Room 231
House Office Building
Annapolis, Maryland 21401

**HB 827 | SB 983 – FAVORABLE**

Dear Chair Wilson, Vice Chair Crosby, and Members of the Economic Matters Committee,

TurningPoint Energy ("TPE") is a solar and battery storage development company, with over 240 megawatts in development or operation in Maryland. We are proud to have been participating in Maryland's community solar pilot program since its inception in 2015 and continue to invest heavily in the state's clean energy future.

It is an understatement to say Chair Clippinger, Delegate Fraser Hidalgo, and Delegate Charkoudian are leaders in clean energy. TPE is grateful for their tireless efforts to bring about practical and significant solutions for growing Maryland's in-state renewable resources.

The 2025 legislative session has focused on how the state can deploy more in-state energy resources while minimizing ratepayer impact - HB 827 is one of these solutions. The Certificate of Public Convenience and Necessity (CPCN) process was developed decades ago to manage the permitting process of large-scale, thermal power plants. However, a significant portion of Maryland's future energy resources – specifically medium-scale solar energy projects do not accompany the types of land use, air and water quality, and other community impacts as traditional gas, coal or nuclear facilities. By creating a streamlined permitting process of qualifying solar projects fewer than 5 megawatts in size – Maryland will accelerate the deployment of distributed energy resources, while reducing administrative burdens on its state agencies.

TPE affirms the HB 827 is fundamental to address a looming bottleneck in community solar applications to the Pubic Service Commission (PSC) and Power Plant Research Program (PPRP). In January, this Committee was briefed on how transmission-level projects have been backlogged at PJM for several years, and how inefficient processes and a lack of staff resources starved the region of meeting its full potential to deploy renewable energy over the last decade. HB 827 would ensure a similar process does not take place with distributed generation here in Maryland.

In the spirit of continuing the growth of Maryland's community solar deployment, I offer additional language related to cross utility crediting for low to moderate income households. This language, based off Delegate Johnson's HB 1233, would ensure that the growth of medium-scale solar energy does not lose a step due to Maryland's more populous utility territories lacking a substantial number of sites for solar deployment.

Thank you for your time and consideration. I have included proposed language below, and urge a favorable vote on HB 827.

/s/
David Murray
dmurray[at]tpoint-e.com

Article – Public Utilities

7–306.2.

(d) (3) (I) Subscribers served by electric standard offer service, community choice aggregators, and electricity suppliers may hold subscriptions to the same community solar energy generating system.

**(II) 1. EXCEPT AS PROVIDED IN SUBSUBPARAGRAPH 2 OF THIS SUBPARAGRAPH, A SUBSCRIBER MUST RESIDE IN THE SAME ELECTRIC SERVICE TERRITORY AS THE COMMUNITY SOLAR ENERGY GENERATING SYSTEM TO WHICH THE SUBSCRIBER HOLDS A SUBSCRIPTION.**

**2. AN LMI SUBSCRIBER MAY HOLD A SUBSCRIPTION TO A COMMUNITY SOLAR ENERGY GENERATING SYSTEM LOCATED IN A DIFFERENT ELECTRIC SERVICE TERRITORY THAN THE ONE IN WHICH THE LMI SUBSCRIBER RESIDES.**

(j) (2) (i) This paragraph applies to electric companies, electric cooperatives, and municipal utilities that participate in the Program.

(ii) A subscriber who has a change in the service address associated with the subscriber's subscription may maintain the subscription for the new address if the new address is within the same electric territory as the old address.

(iii) An electric company or a subscriber organization may not terminate a subscriber's subscription due to a change of address for the service address associated with the subscription if the requirements under subparagraph (ii) of this paragraph are met.

(iv) An electric company shall make any changes necessary to accommodate a subscriber's change of address on notification by a subscriber organization.

**(O) (1) AN LMI SUBSCRIBER THAT RESIDES IN A DIFFERENT ELECTRIC SERVICE TERRITORY THAN THE COMMUNITY SOLAR ENERGY GENERATING SYSTEM SHALL RECEIVE THE LESSER OF THE BILL CREDIT VALUE AS AN LMI SUBSCRIBER THAT RESIDES IN THE SAME ELECTRIC SERVICE**

**TERRITORY AS THE COMMUNITY SOLAR ENERGY GENERATING SYSTEM, OR THE BILL CREDIT VALUE IF THE COMMUNITY SOLAR ENERGY GENERATING SYSTEM WAS LOCATED IN THEIR ELECTRIC SERVICE TERRITORY.**

**(2) ON OR BEFORE JANUARY 1, 2026, BY ORDER OR REGULATION, THE COMMISSION SHALL ESTABLISH A PROCESS FOR THE APPLICATION OF COMMUNITY SOLAR BILL CREDITS TO THE BILL OF A LMI SUBSCRIBER REGARDLESS OF WHETHER THE COMMUNITY SOLAR ENERGY GENERATING SYSTEM IS LOCATED IN THE SAME ELECTRIC SERVICE TERRITORY AS THE LMI SUBSCRIBER.**

**(3) ON OR BEFORE JANUARY 1, 2026, THE COMMISSION SHALL APPROVE OR AMEND AND APPROVE THE TARIFFS AND PROTOCOLS REQUIRED UNDER PARAGRAPH (1) OF THIS SUBSECTION.**

**Testimony Solar Siting DGCPCCN HB827 final.pdf**
Uploaded by: Debbie Cohn
Position: FAV

| | |
|---|---|
| **Committee:** | **Economic Matters** |
| **Testimony on:** | **HB827 – Solar Energy – Distributed Generation Certificate of Public Convenience and Necessity, Ground-Mounted Solar, and Small Solar Siting Workgroup** |
| **Submitting:** | **Deborah A. Cohn** |
| **Position:** | **Favorable** |
| **Hearing Date:** | **March 13, 2025** |

Dear Chair and Committee Members:

Maryland has consistently fallen short of its Renewable Portfolio Standard (RPS) targets that call for 7% of the state's renewable energy to come from solar in 2025 and 14.5% by 2030.[1] HB827 seeks to reduce this gap by simplifying and accelerating an application's review, thereby reducing time, risk, uncertainty and regulatory costs for applicants seeking to construct solar energy generating systems producing more than 2 but not more than 5 MW of alternating current. It also imposes a two year ban on enacting zoning laws or regulations that would impede ground-mounted solar generating systems generating no more than 2MW.

**For projects designed to produce more than 2 but not more than 5MW, the bill calls for simplifying and accelerating the process for securing a Distributed Generation Certificate of Public Convenience and Necessity (DGCPCN) from the Public Service Commission (PSC).** HB827 requires the Department of Natural Resources' Power Plant Research Program (PPRP) to submit to the PSC proposed siting and design requirements and licensing conditions for new community solar projects seeking state approvals. Once approving these requirements and conditions, the PSC would be required to approve proposals meeting the requirements and conditions within a specific time period. Importantly, HB827 creates opportunity for public comment by affected communities at each step of both the PPRP and PSC reviews.

**Temporary Ban on County Zoning Restrictions on Small Ground Mounted Solar Generating Systems.** HB827 also imposes a two year ban on enacting zoning laws or regulations that would impede ground-mounted solar systems generating no more than 2MW. State preemption of local zoning laws needs to be carefully considered. The ban in HB827 is not retroactive. It provides reasonable time to balance the need to build more solar energy generating systems in Maryland while respecting local zoning prerogatives not preempted by the State's Supreme Court decision upholding Board of County Commissioners of Washington County, Maryland v. Perennial Solar, LLC.

[1] The RPS calls for 38% of the state's *total* energy to come from renewable sources by 2025 and 52.5% by 2030. chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://dls.maryland.gov/pubs/prod/NatRes/***Introduction theRenewableEnergy Portfolio Standard***.pdf

**Conclusion.** Maryland needs to fast-track new clean energy projects. Maryland does not have an energy generation and transmission friendly reputation. This needs to change. But that change needs to favor low-cost zero emissions energy. HB827 carefully balances the importance of meaningful public involvement with the need to accelerate and reduce the cost of attracting more solar projects in Maryland.

For these reasons I urge this Committee to amend the bill, as suggested above, and issue a **FAVORABLE** report on HB827 without weakening amendments.

**CleanCapital Favorable Testimony_HB 827_3-11-2025.**
Uploaded by: Jeremy Abcug
Position: FAV

RE: HB 827 – Public Utilities - Distributed Generation Certificate of Public Convenience and Necessity

**Favorable**

Chair Wilson and members of the House Economic Matters Committee,

CleanCapital provides this written testimony regarding House Bill (HB) 827. CleanCapital's position on this legislation is Favorable.

CleanCapital is a diversified clean energy company focused on strategic investments in the full lifecycle of solar and energy storage projects, including early-stage development, construction, and operations. CleanCapital is a leadership member of the Coalition for Community Solar Access—a national trade association representing over 125 community solar developers, businesses, and nonprofits—and is among the top ten commercial solar asset owners in the U.S., managing an operating portfolio of more than 200 projects totaling more than 340 MW and a pipeline totaling well over 2 GW. To date, the company has invested over $1 billion in projects and companies, including 17 operating projects with a cumulative nameplate capacity of over 25 MW in Maryland. We are grateful to this Committee for supporting the passage of HB 908 in 2023, which made community solar a permanent solution in Maryland.

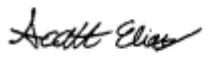
HB 827, sponsored by Chair Clippinger, Delegate Charkoudian, and Delegate Fraser-Hidalgo, would create a Distributed Generation Certificate of Public Convenience and Necessity (DGCPCN), that would streamline the permitting process for qualifying community solar projects between 2 and 5 megawatts. The bill directs the Power Plant Research Program (PPRP) to develop standard siting and design requirements through a stakeholder engagement process and for the Public Service Commission to consider that input in establishing the regulations and application requirements for a DGCPCN. Finally, when processing a DGCPCN application, the Commission must ensure public comment opportunities are available and hold a public hearing.

HB 827 would drive greater transparency, efficiency, and consistency in permitting community solar projects in Maryland. CleanCapital is looking forward to future investment in the state which would bring more community solar projects online and provide the benefits of community energy to Maryland ratepayers.

CleanCapital appreciates Chair Clippinger and Delegates Charkoudian and Fraser-Hidalgo for their leadership on HB 827 and their continued support for community solar. CleanCapital also appreciates the Senate and House Leadership for taking up siting in HB 931 and HB 1036 which establish siting standards for solar and storage systems. HB 827 builds on the direction of the Leadership bill by providing a narrower solution specific to siting and administrative challenges for community solar projects that require (between 2-5 megawatts) a CPCN. This bill is an important next step to reducing barriers for community solar and achieving the energy and equity benefits of the permanent program.

**CleanCapital urges a favorable report on HB 827.**

Sincerely,



Scott Elias,
Director of Policy and Market Development
CleanCapital
selias@cleancapital.com

**HB827_Chaberton_Miller_FAV.pdf**
Uploaded by: John Miller
Position: FAV

March 6, 2025

To: Senate Education, Energy, and the Environment Committee

Re: **HB 0827**: Solar Energy - Distributed Generation Certificate of Public Convenience and Necessity, Ground-Mounted Solar, and Small Solar Siting Workgroup - **FAVORABLE**

Chairs and members of the House Economic Matters Committee:

My name is John Miller. I live in Woodstock, Maryland located in Howard County. I represent Chaberton Energy ("Chaberton"). We are a Maryland based renewable energy company headquartered in Rockville, Maryland located in Montgomery County. We are a leading developer in the state's Community Energy Generating Systems ("CSEGS") Program. Just last year, Chaberton was named to the Inc. 5000 list as both the 34th fastest-growing private company and the 1st fastest-growing community solar company in the United States.

Chaberton's foundation was constructed around the framework that this body set up with the original Community Solar Pilot Program. In nearly five years, we have grown from just a company of just a few to one which now has over 50 employees. We have multiple solar projects operating in Maryland, as well as a robust pipeline of projects in construction and development. These projects are located in the very districts many of you represent.

The projects we develop deliver real and tangible benefits to your constituents. We save Marylanders an average of $150 per household annually on their utility costs. Each Community Solar project supports well over $2.5M in savings for subscribers, all of whom reside in Maryland and many of whom are Low-to-Moderate Income (LMI) subscribers. As an industry, we support ensuring the benefits of solar energy flow to those who need it most. The energy bill savings we can offer to LMI subscribers are often even greater than these average cost savings and provide a necessary lifeline to those struggling to meet basic needs, including increased energy costs.

These projects also support Maryland by delivering additional tax revenue to the state and its counties. Each project delivers hundreds of thousands of dollars in tax revenue while not requiring any local services or costs. Additionally, they support local job creation and retention. While delivering tangible financial benefits, these projects also provide significant environmental benefits to support Maryland's efforts of being a leader on climate change. Based on the EPA's Greenhouse Gas Equivalencies Calculator, a typical 2-megawatt ac project offsets carbon emissions by ~3,700 tons of CO2 per year compared with electricity generated from traditional sources. This saves equal to the emissions of over 3.7M pounds of coal burned and over 3.8M miles driven by gasoline-powered cars. It is also equal to the same amount of carbon captured by nearly 4,000 acres of local forests. Those numbers are all for a single project!

Chaberton Energy has led the way amongst in community solar with the Certificate of Public Convenience and Necessity ("CPCN") process. We were the first to receive a Final Order from the Public Service Commission ("PSC") for a community solar project. We have a total of 17 CPCN applications in various stages, 11 of which are currently filed and 6 more which we plan to file by summer 2025, which represent more than 70MWac of in-state solar capacity. We commend the Public Service Commission, Power Plant Research Program, and the Public Utility Law Judges for their work in reviewing and processing these applications. We have found the process to be straight forward and without undue delays. However, we do have concerns that the project load will become overwhelming and may lead to project delays which are highly concerning due to the possibility that interconnection timeframes may cause projects to need to make decisions on making large interconnection payments without yet their CPCN approval in hand. Furthermore, due to the nature that the CPCN process was designed for very large-scale power generation facilities, the process is not designed to be efficient for relatively small scale solar projects.

We believe that the DG-CPCN process as outlined in this bill will lead to a more efficient approval process, leading to projects being able to come online sooner. If this effort is paired with SB0931 / HB 1036, the Renewable Energy Certainty Act, this would facilitate the ability to develop more projects and do so more efficiently, helping the State to meet its climate and clean energy goals.

In order to keep building on the successes of Maryland, to keep fostering jobs for a strong local economy, stimulating tax revenue, saving the people of Maryland money on their energy bills, supporting energy equity to LMI residents, and providing energy choice to all residents, it is imperative that we install solar more efficiently. We respectfully request a favorable report on HB 827.

Respectfully Submitted,

John Miller
Chaberton Energy
Vice President of Development

**HB 827 Testimony_ECA Solar_2025.pdf**
Uploaded by: Kaitlin Kelly O'Neill
Position: FAV

ECA Solar
203 Crescent St., Suite 106
Waltham, MA 02453

Economic Matters Committee
Maryland General Assembly

March 13, 2025

**RE: HB 827 – Public Utilities - Distributed Generation Certificate of Public Convenience and Necessity- Favorable**

Chair Wilson and members of the House Economic Matters Committee,

ECA Solar provides this written testimony regarding House Bill (HB) HB 827. ECA Solar's position on this legislation is Favorable. ECA Solar develops community-scale solar projects that provide significant benefits to the local economy, community, and environment. Independently owned and operated for over 10 years, we conduct comprehensive due diligence and streamline operations for project development. As a trusted and reliable partner, we partner with landowners to create a solution that protects their land and secures their financial future. Investors trust us to secure land, permits, utility approvals, while keeping a pulse on the changing regulatory environment. With our decades of experience, a strong reputation, and proven industry leadership, we enable clean energy for the communities of tomorrow.

ECA Solar is engaged in the Maryland community solar market as a community solar developer. We are grateful to this Committee for supporting the passage of HB 908 in 2023, which made community solar a permanent solution in Maryland. The permanent Community Solar Energy Generating Systems (CSEGs) Program is helping to generate local economic investment with continued clean energy growth, while simultaneously strengthening the local grid, and directing savings to thousands of customers. The permanent program was a critical step to solidifying Maryland's clean energy future, but the bill before you today is necessary to make sure possible choke points in the approval process are streamlined to prevent unnecessary delays in building project capacity.

Senator Brooks' HB 827 would create a Distributed Generation Certificate of Public Convenience and Necessity (DGCPCN), that would streamline the permitting process for qualifying community solar projects between 2 and 5 megawatts. The bill directs the Power Plant Research Program (PPRP) to develop standard siting and design requirements through a stakeholder engagement process and for the Public Service Commission to consider that input in establishing the regulations and application requirements for a DGCPCN. Finally, when processing a DGCPCN application, the Commission must ensure public comment opportunities

ECA Solar
203 Crescent St., Suite 106
Waltham, MA 02453

are available and hold a public hearing. HB 827 would drive greater transparency, efficiency, and consistency in permitting community solar projects in Maryland.

ECA Solar appreciates Chair Clippinger and Delegates Charkoudian and Fraser-Hidalgo for their leadership on HB 827 and their continued support for community solar. ECA Solar also appreciates the Senate and House Leadership for taking up siting in 931 and HB 1036 which establish siting standards for solar and storage systems. HB 827 builds on the direction of the Leadership bill by providing a narrower solution specific to siting and administrative challenges for community solar projects that require (between 2-5 megawatts) a Certificate of Public Convenience and Necessity. This bill is an important next step to reducing barriers for community solar and achieving the energy and equity benefits of the permanent program.

**We urge a favorable report on HB 827.**

Sincerely,

Kaitlin Kelly O'Neill
Director of Policy

www.ecasolar.com
info@ecasolar.com
508.460.2068

**HB827-AHB-Favorable.pdf**
Uploaded by: Kathleen Gramp
Position: FAV

Testimony of the Advocates for Herring Bay[1]
Regarding HB 827 – Solar Energy – DGCPCN
Submitted by Kathleen Gramp, March 11, 2025

***Favorable, assuming adoption of sponsor amendments***

HB 827 would establish a new regulatory framework for solar generation projects between 2 and 5 megawatts of capacity (or DGCPCN[2]), allowing those projects to be approved on an expedited basis if they meet standard conditions and procedural requirements. Those conditions include compliance with guidelines aimed at reducing impacts on forested lands and stormwater runoff.

The Advocates for Herring Bay (AHB) commend the sponsors for including provisions that address the ecological and water quality impacts of ground-mounted solar projects. Benefits of enacting the bill as amended include:

**Forest protection.** The environmental preservation conditions in Section 7-207.4(B)(2)(III) would prohibit forest clearance except where necessary to reduce shading near the perimeter of the site or for certain specified needs. Linking that condition to expedited approval creates an incentive to avoid siting projects on parcels that are largely or completely forested while still allowing for incidental clearing. Without those protections, more projects like those shown in Attachment 1 will be built on forested land, including some in the jurisdictions that experienced the greatest forest loss over the 2013-2018 period according to a 2022 study by the Hughes Center on Agro-Ecology.[3]

**Stormwater management.** Section 7-207.4(B)(2)(IV) as amended would align Maryland's licensing conditions with best practices for estimating and minimizing runoff from solar projects. Those updates are urgently needed, especially in the state's MS4 jurisdictions. Maryland's existing solar stormwater guidelines were written over a decade ago, before the state began experiencing more intense rain events stemming from climate change or had experience with projects across Maryland's diverse geographic regions. They also predate recent studies that show that maintaining well-drained soils and deep-rooted vegetation under and between the panels—the site's "green infrastructure"—is key to reducing runoff from solar sites (See Attachment 2). [4]

The guidelines in HB 827 will encourage solar developers to take a holistic approach to estimating stormwater runoff, one that accounts for the characteristics of the soils at each site (before and after construction), the ground covers under and between the solar panels, and the impacts of the solar panels themselves, which may vary in size, distribution, and technology. That approach also allows for consideration of varied rainfall levels, unlike Maryland's current guidelines, which are designed for one inch of rain.

Taken together, the forestry and stormwater provisions in HB 827 will help safeguard Maryland's environmental resources as we decarbonize our electricity supplies. AHB urges the Committee to issue a favorable report on HB 827 as amended.

Thank you for considering our views and supplemental information in Attachments 1 and 2.

---

[1] The Advocates for Herring Bay, Inc. is a community-based environmental group in Anne Arundel County.
[2] DGCPCN refers to Distributed Generation projects receiving a Certificate of Public Convenience and Necessity.
[3] See Technical Study of Changes in Forest Cover and Tree Canopy in Maryland, November 2022.
[4] See National Renewable Energy Laboratory's (NREL) overview of the PV-SMaRT program, which includes a link to the PV-SMaRT calculator; Great Plains Institute, Best Practices: Photovoltaic Stormwater Management Research and Testing (PV-SMaRT), January 2023; and Penn State University, Solar Farms with Stormwater Controls Mitigate Runoff, Erosion, July 18, 2024.

# Attachment 1: Examples of Solar Projects Sited on Forested Parcel

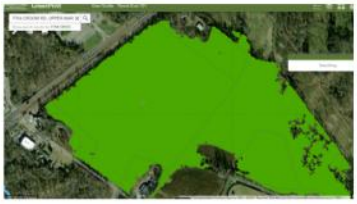
*Maps of ecosystems services values are from MD DNR's [Greenprint GIS]*

## 7704 Croom Rd, Upper Marlboro MD (pending PSC review)

5 megawatts

Aerial image of parcel
Pre-construction

Highest Ecosystem Services Values
Greens- $900 to $2,800/acre/year
Blues – $2,700 to $3,600+/acre/year



MD Habitat Connectivity Network
Shaded in green

## 5505 Kirby Road, Clinton, MD (in service)

1.32 megawatts

Aerial image of parcel
Pre-construction


Aerial image of parcel
Post-construction

Highest Ecosystem Services Values
Greens- $900 to $2,800/acre/year
Blues – $2,700 to $3,600+/acre/year

## 10711 Cross Trail Road, Brandywine, MD (in service)

0.875 megawatts

Aerial image of parcel
Pre-construction

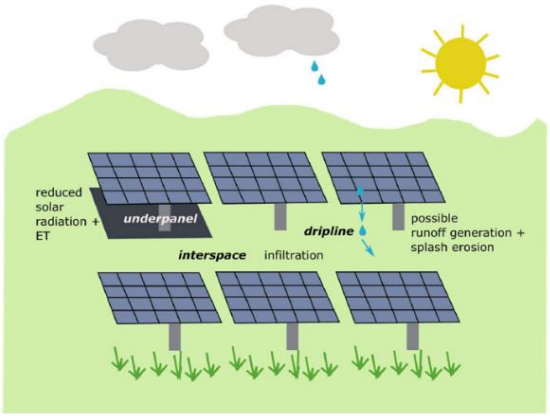

Aerial image of parcel
Post-construction

Highest Ecosystem Services Values
Greens- $900 to $2,800/acre/year
Blues – $2,700 to $3,600+/acre/year

**AHB Attachment 2: Background Information on Solar Stormwater Issues (continued >)**

## The challenges for solar differ from other commercial and industrial sites

Ground-mounted solar arrays need acres of functional green infrastructure *under and between* the solar panels to absorb runoff over the multi-decade operating life of the projects




Graphic: Lauren McPhillips, Penn State

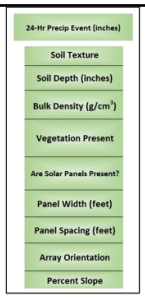
## Recent Research Is Identifying Best Practices for Solar

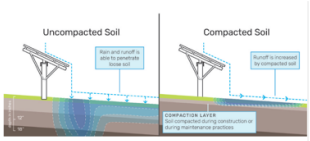
Studies show that runoff can be reduced by maintaining well-drained soils and healthy vegetation under and between the panels

Maximizing the effectiveness of that **green infrastructure** also can lower the cost of stormwater mitigation

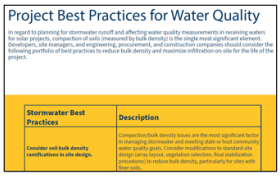

## Those studies identify the key variables that affect runoff from solar projects

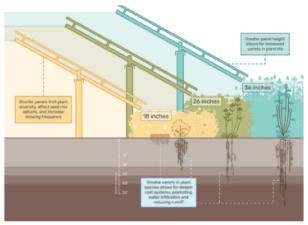
- Soil density—before and after construction
- Soil texture and depth
- Ground cover under and between panels throughout the life of the project
- Role of panels in amount and distribution of runoff
- Intensity of future rain events




Finding #1:
Compaction/Bulk Density




Finding #3:
Ground Cover

**Graphics: PV-Smart project (NREL and Great Plains Research Institute)**

## AHB Attachment 2 (continued >)[5]

**MDE has not issued updated guidelines to reflect research on best practices**

- MDE's solar guidelines reference a design manual from 2000 and focus on treating 1-inch of rainfall
- Do not account for site-specific soil features or compaction
- Do not account for variations in the type or sustainability of vegetation under and between panels
- Do not account for variations in panel technology choices
- Result: using outdated rainfall assumptions underestimates runoff
- Result: generic calculations could underestimate or overestimate runoff at individual projects

**Example 1 – Using Non-Rooftop Disconnection Where the Average Slope ≤ 5%**

Several rows of solar panels will be installed in an existing meadow. The soils within the meadow are hydrologic soil group (HSG) B and the average slope does not exceed 5%. Each row of panels is 10 feet wide and the distance between rows is 20 feet. The rows of solar panels will be installed according to Figure 1 below. In this scenario, the disconnection length is the same as the distance between rows (20 feet) and is greater than the width of each row (10 feet). Therefore, each row of panels is adequately disconnected and the runoff from 1.0 inch of rainfall is treated.

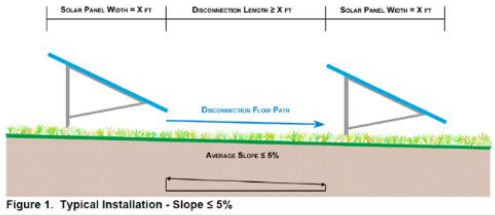
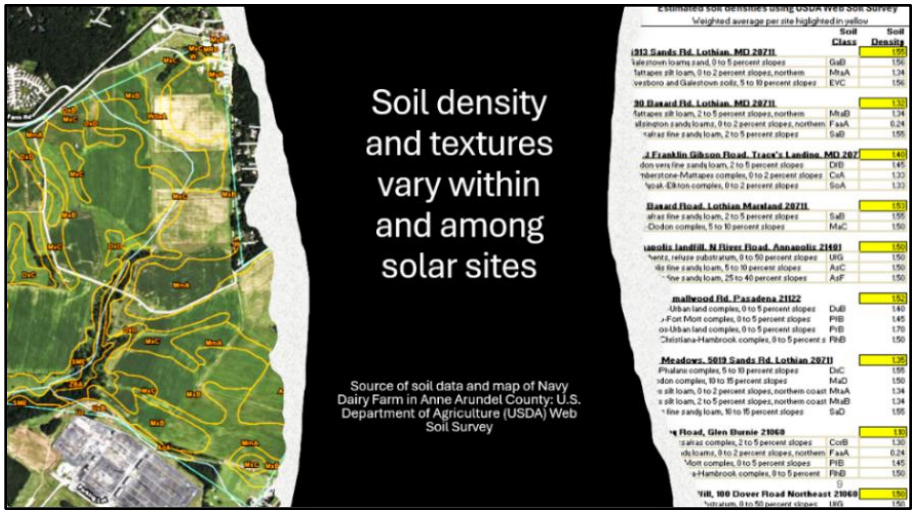
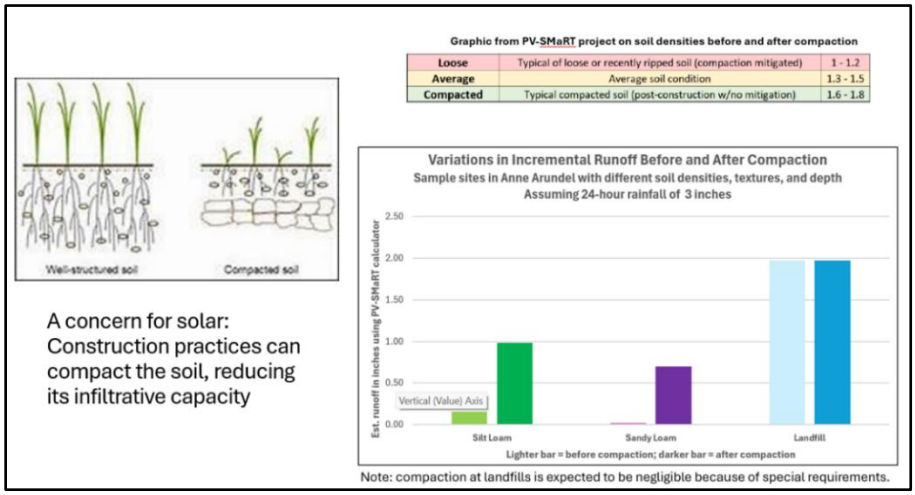



Figure 1. Typical Installation - Slope ≤ 5%

Source: Maryland Department of the Environment, *Stormwater Design Guidance, Solar Panel Installations,* extracted September 24, 2024




[5] The estimates of runoff presented in this Attachment were calculated using NREL's PV-SMaRT calculator, version 3.1. Unless otherwise noted, the estimates assume that the ground cover under the solar panels is turf grass. In addition, the estimates of runoff account for the mitigation benefits of the "disconnection" distances between rows of panels. That is, the amounts shown in the graphs are the incremental amounts of runoff not addressed by the vegetation between the rows.

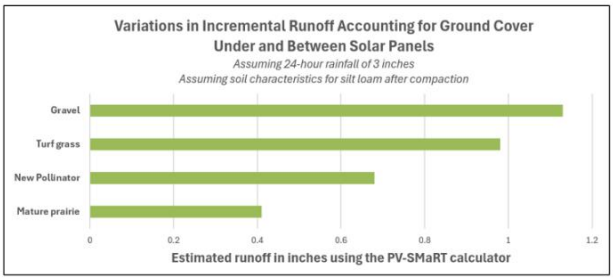
## AHB Attachment 2 (end)

Runoff varies depending on the type of vegetation established under and between solar panels

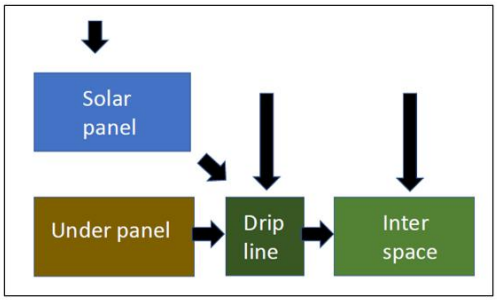
Summary of findings reported by Jeff Mulhollem, Penn State College of Engineering, July 18, 2024

In findings recently published in Journal of Hydrology, the team reported that healthy vegetation and well-draining soils can help manage runoff on solar farms, and where necessary on more challenging landscapes, engineered stormwater controls can manage any unmitigated runoff.

Photo credit: Penn State Creative Commons




Graphic: Lauren McPhillips, Penn State



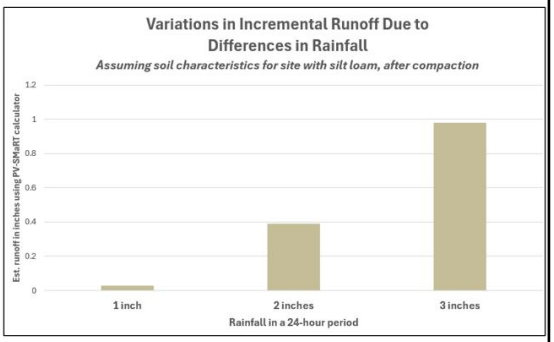


Runoff also is affected by the size and location of the panels and developers' choice of panel technology

The panels are impervious and concentrate runoff. The extent and distribution of those impacts will be affected by the contours of the site as well as whether the panels are fixed or tilt in response to environmental conditions

**Estimates of runoff at solar sites need to be stress-tested for variations in the severity of future rainfall events**

Photo credit: https://esemag.com/stormwater/lessons-learned-solar-project-present-unique-stormwater-management-challenges



**Lightstar testimony_HB 827_3-6-2025.pdf**
Uploaded by: Kelly Buchanan
Position: FAV

LIGHTSTAR

March 4, 2025

Delegate C.T. Wilson, Chair
House Economic Matters Committee
Room 231
House Office Building
Annapolis, Maryland 21401

**RE: HB 827 –** Public Utilities - Distributed Generation Certificate of Public Convenience and Necessity, **Favorable testimony**

Dear Chair Wilson and members of the House Economic Matters Committee:

Lightstar Renewables LLC (Lightstar) provides this written testimony regarding House Bill (HB) 827. Lightstar's position on this legislation is favorable.

Lightstar develops, builds, and owns community solar projects with more than 1200 megawatts (MW) of projects completed or in development across the country. Of that 1200 MW portfolio, 500 MWs are agrivoltaics (the integration of agricultural and/or horticultural production and solar on a single parcel of land). In Maryland, we have 132 MWs of solely agrivoltaics projects under development across a variety of counties. Lightstar is diligently working with Maryland's county leadership and other policy stakeholders to communicate the benefits of preferred siting methods like agrivoltaics. Our mission is to build solar for both the land and the community. Lightstar is focused on community solar development that is built with ecological and agricultural needs at the forefront, which we believe is key to the next phase of securing energy independence and protecting valuable farmland.

We are grateful to this Committee for supporting the passage of HB908 in 2023, which made community solar a permanent program in Maryland and most importantly created a definition of agrivoltaics and the ability to co-locate these projects under specific circumstances. Because of that, we are able to offer farmers a unique solution to improve their financial viability and the opportunity to continue farming, especially by keeping tenant farmers on the land.

HB 827, sponsored by Chair Clippinger, Delegate Charkoudian, and Delegate Fraser-Hidalgo, would create a Distributed Generation Certificate of Public Convenience and Necessity (DGCPCN), that would improve the permitting process for qualifying community solar projects between 2 and 5 megawatts. The bill directs the Power Plant Research Program (PPRP) to develop standard siting and design requirements through a stakeholder engagement process and for the Public Service Commission to consider that input in establishing the regulations and application requirements for a DGCPCN. Finally, when processing a DGCPCN application, the Commission must ensure public comment opportunities are available and hold a public hearing.

HB 827 would drive greater transparency, efficiency, and consistency in permitting community solar projects in Maryland. This would help Lightstar because we believe agrivoltaics projects must be sited

responsibly and with a high bar for agricultural production. Ensuring that each project moves through the CPCN process in an efficient and thorough manner would ultimately save time and would appropriately protect farmers, farmland, counties, and landowners with appropriate siting expectations.

Lightstar appreciates Chair Clippinger and Delegates Charkoudian and Fraser-Hidalgo for their leadership on HB 827 and their continued support for community solar. Lightstar also appreciates the Senate and House Leadership for taking up siting in SB 931 and HB 1036 which establish siting standards for solar and storage systems. HB 827 builds on the direction of the Leadership bill by providing a narrower solution specific to siting and administrative challenges for community solar projects that require (between 2-5 megawatts) a Certificate of Public Convenience and Necessity. This bill is an important next step to reducing barriers for community solar, including agrivoltaics, and achieving the energy and equity benefits of the permanent program.

**Lightstar urges a favorable report on HB 827.**

Sincerely,

Kelly Buchanan
Senior Policy & Strategy Manager, Lightstar
Kelly.buchanan@lightstar.com
303-956-1246

**HB827 DGCPCN SEIA Testimony.pdf**
Uploaded by: Leah Meredith
Position: FAV

March 11, 2025

Delegate C. T. Wilson
Chair
House Economic Matters Committee
231 Taylor House Office Building
6 Bladen Street
Annapolis, MD 21401

Delegate Brian M. Crosby
Vice Chair
House Economic Matters Committee
231 Taylor House Office Building
6 Bladen Street
Annapolis, MD 21401

RE: SEIA Support for HB827: Solar Energy - Distributed Generation Certificate of Public Convenience and Necessity, Ground-Mounted Solar, and Small Solar Siting Workgroup

Chair Wilson, Vice Chair Crosby, and Members of the House Economic Matters Committee:

I am writing on behalf of the Solar Energy Industries Association (SEIA) in **support** of HB827 (Clippinger). It was referred to the House Economic Matters Committee on February 4, 2025.

Founded in 1974, SEIA is the national trade association for the solar and storage industries, building a comprehensive vision for the advancement of these technologies. SEIA is leading the transformation to a clean energy economy by supporting policy measures that will drive the needed investment in clean, domestic, local job-producing solar generation. We work with our 1,200+ member companies, which include solar and storage manufacturers, service providers, residential, community and utility-scale solar developers, installers, construction firms, and investment firms, as well as other strategic partners, to shape fair market rules that promote competition and the growth of reliable, low-cost energy storage and solar power.

In 2023 the Maryland General Assembly passed HB908, which established a permanent community solar program in the state of Maryland. Community solar provides homeowners, renters, and businesses equal access to the economic and environmental benefits of solar energy generation regardless of the physical attributes or ownership of their home or business. Community solar expands access to solar for all, in particular low-to-moderate income utility customers. Maryland's community solar program requires every project to dedicate at least 40% of its capacity for low and moderate income customers, and ensures all participating residential customers will have lower electricity costs.

Community solar projects above 2 megawatts fall within the permitting jurisdiction of the state via the Maryland Public Service Commission and its Certificate of Public Convenience and Necessity ("CPCN") process. Maryland's CPCN process is well equipped to handle complex utility-scale and transmission-based permitting reviews where each project is significantly different from the next. However, it is not well-aligned for most community solar projects, which are typically similar in size and design. Further, a CPCN can entail an adjudicated process that requires a disproportionate amount of time and cost for project developers relative to what's need for community solar project scale and impact. This misalignment between the permitting process and unique needs of community solar projects threatens to slow down and undermine renewable energy deployment. It will create an outsized burden not just for solar developers,

but also the state agencies involved in CPCN reviews. This issue is compounded by the fact that the number of CPCN applications will grow exponentially in the coming years due to community solar.

HB827 creates a distributed generation ("DG") CPCN process for qualifying community solar projects that will result in an optimal design and siting process for these projects. Developers will be incentivized to leverage the DG-CPCN in lieu of the standard CPCN process. To qualify, projects will need to meet the siting and design standards established by the state and informed by stakeholder input and industry best practices. HB827 will right-size the cost, time, and resource investments by community solar developers to be commensurate with project scale and impact. Public agencies will likewise benefit from an efficient yet robust process that facilitates clean energy deployment in the state. HB827 will enable faster deployment of community solar, contributing to the state's solar energy requirements and providing customers, especially those who are low-moderate income, with access to clean energy and electricity savings, thus also supporting the state's equity goals.

For these reasons, SEIA strongly supports this legislation and respectfully urges the Committee to issue a favorable report on HB827. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Leah Meredith

Leah Meredith
Mid-Atlantic Regional Director
Solar Energy Industries Association
lmeredith@seia.org

**hb827 solar energy siting, etc. EM 3-13-2025.pdf**
Uploaded by: Lee Hudson
Position: FAV

**Delaware-Maryland Synod**
**Evangelical Lutheran Church in America**
God's work. Our hands.

Testimony Prepared for the
Economic Matters Committee
on
# House Bill 827
March 13, 2025
Position: **Favorable**

Mr. Chairman and members of the Committee, thank you for this opportunity to support a cleaner energy future in Maryland by facilitating more green energy production in Maryland. I am Lee Hudson, assistant to the bishop for public policy in the Delaware-Maryland Synod, Evangelical Lutheran Church in America. We are a faith community within three judicatories across our State.

My community publicly supported a cleaner energy future in its 1993 statement on the environment, "Caring for Creation". We are called to advocate for reductions of current and future greenhouse gas emissions with public policies that influence energy consumption and production.

We have supported legislation in the Maryland General Assembly to advance a decarbonized future for decades. The *2022 Maryland Climate Solutions Act* committed Maryland's public decision-making to implement an energy transition, and we enthusiastically endorsed it. Increasing clean electric energy production is good policy to achieve that goal. And getting more power from the sun is feasible and increasingly popular as indicated by growing consumer interest in residential solar.

Despite what it has legislated, Maryland has repeatedly fallen behind its own clean energy goals. Between learnings about implementation and accelerating climate catastrophe events, surely the State should do better. Making beneficial policy adjustments is necessary. Getting more solar into the generation mix, a now cost-effective and immediately available choice, is a best-practice that could use more facilitation. We understand **House Bill 827** to do that by expanding the siting of solar at smaller scales.

As we have noted in testimony over decades, policies that are barriers to scaling green energy advance dirty energy. They favor the few by badly serving the whole with risk from climate catastrophe and its multitude costs. We continue to urge policies that facilitate as rapid a transition to cleaner energy as possible, here in Maryland and nationally.

**House Bill 827** is incremental in ambition, but coherent in intention, and should get your favorable report.

Lee Hudson

5699 Meridale Rd. Baltimore, MD 21228 410-230-2860 800-869-5492 fax 410-230-2871

**ECA testimony on HB0827 DGCPCN.pdf**
Uploaded by: Leslie Wharton
Position: FAV

HB - SUPPORT
Frances Stewart, MD
Elders Climate Action Maryland
frances.stewart6@gmail.com
301-718-0446

HB0827

Meeting of the Economic Matters Committee

March 13, 2025

Dear Chair Wilson, Vice Chair Crosby, and Members of the Committee, on behalf of Elders Climate Action Maryland, I urge a favorable report on HB0827.

Elders Climate Action is a nationwide organization devoted to ensuring that our children, grandchildren, and future generations have a world in which they can thrive. The Maryland Chapter has members across the state.

Each day, we see the climate crisis more clearly. We know that Maryland is at risk for sea level rise, flooding from intense rainfall, heat waves, and other extreme weather events. Maryland can also be a leader in moving us to a safer, healthier future where we all can thrive. The clean energy transition is an essential part of that future.

Marylanders are also concerned about the rising cost of living, and particularly, about rising energy costs. In 2023, approximately 400,000 Maryland households[1] were paying more than six percent of their income for energy bills. Energy costs are particularly a problem for low-income households and people with fixed incomes, many of whom are elders.

Solar generation is the least expensive way to add new electric generation, but the growth of solar energy in Maryland has been much less than hoped. One reason for that is the inordinately long interconnection queue at PJM. There are signs that is improving, but it continues to be a barrier.

Small solar projects such as the ones dealt with by this bill avoid that queue, which makes them especially valuable. Also, they support the distribution grid and have fewer losses than generation sites that are far away. Many of them will be community solar projects that will cut electricity bills for low and moderate-income customers, who are the hardest hit by high utility bills.

The development of the Distributed Generation Certificate of Public Convenience and Necessity and the siting guidelines would foster the development of these important projects while protecting communities and the environment.

For all of these reasons, we strongly urge a favorable report on HB0827.

Thank you.

1 https://www.psehealthyenergy.org/over-18-percent-of-maryland-households-are-burdened-by-high-energy-bills/

**HB0827_FAV_SolarDGCPCN_ECM_HoCoCA.org.pdf**
Uploaded by: Liz Feighner
Position: FAV

**HB0827 – Solar Energy - Distributed Generation Certificate of Public Convenience and Necessity, Ground-Mounted Solar, and Small Solar Siting Workgroup**
**Hearing Date: March 13, 2025**
**Bill Sponsor: Delegate Clippinger**
**Committee: Economic Matters**
**Submitting:** Liz Feighner for **Howard County Climate Action, Indivisible Howard County**
**Position: Favorable**

**HoCo Climate Action** is a 350.org local chapter and a grassroots organization representing approximately 1,400 subscribers. We are also a member of the Climate Justice Wing of the Maryland Legislative Coalition. **Indivisible Howard County** represents 900+ members and is an active member of the Maryland Legislative Coalition (with 30,000+ members).

We urge you to vote favorably on the **Solar DGCPCN streamline bill, HB0827**, which aims to strengthen Community Solar in the state, by creating a streamlined permitting process for these relatively smaller projects. The bill will optimize the permitting process for Community Solar projects, create predictable design standards for approval, speed up deployment of critical generation assets in the state, and ensure continued access to clean, renewable energy especially for low-to-moderate income Maryland residents.

HoCo Climate Action along with many faith communities have been promoting Community Solar to members who wish to enjoy the benefits of participating in having their homes powered by renewable energy without the need and expense of installing solar directly at their homes. We have been frustrated that many times we encourage members to sign up, there is a waiting list because no community solar projects are available because of the long and arduous process of bringing community solar projects online.

HB0827 creates a new Distributed Generation Certificate of Public Convenience and Necessity (DGCPCN) permitting structure, targeted specifically at Community Solar projects between 2-5MW. The current CPCN permitting process was designed for larger power generation and other public projects, which can be arduous and time-consuming for smaller developers.

The proposed legislation would task the Power Plant Research Program (PPRP) with creating standard siting and design requirements, and standard licensing conditions in order to receive a DGCPCN. It would be extremely beneficial in streamlining the process without compromising any standard licensing conditions. Instead of “fasttracking” expensive ill-conceived proposals like new gas-fired power plants and untested small modular nuclear reactors which would inevitably take longer to come online and jeopardize the state meeting its climate requirements, let’s “fasttrack” reliable, cost effective community solar to solve our adequacy issues now. People get on waiting lists to get community solar for their homes. No one wants gas-fired power plants and we don’t need them.

For all of these reasons, we strongly support **HB0827 and urge a FAVORABLE report** in Committee.

**HoCo Climate Action**

**Indivisible Howard County**

**HB827_SUNaction_FAV_Veazey.pdf**
Uploaded by: Liz Veazey
Position: FAV

**Solar United Neighbors Action**

1350 Connecticut Avenue NW,
Suite 412, Washington, DC 20036

RE: HB 827 – Public Utilities - Distributed Generation Certificate of Public Convenience and Necessity

**Favorable**

March 11, 2025

Chair Wilson and members of the House Economic Matters Committee,

Solar United Neighbors Action provides this written testimony regarding House Bill 827. SUN Action's position on this legislation is Favorable.

SUN Action is a 501(c)4 non-profit organization that represents the needs and interests of solar owners and supporters in Maryland and across the country. Together with our 501(c)3 affiliate Solar United Neighbors (SUN), we help people go solar, join together, and fight for their energy rights. SUN is dedicated to creating a clean, equitable, resilient energy system that benefits everyone. SUN has helped more than 1,600 Marylanders add 13.5 MW of solar to their homes and businesses and represents forty thousand solar owners and supporters across the state. These comments are on behalf of SUN Action.

SUN helped develop the original community solar pilot program in Maryland, which launched in 2015 and helped make community solar permanent in 2023 with the passage of HB 908. Community solar supports state clean energy and climate goals with local, clean energy and provides at least 40% of the energy to benefit low-and-moderate income customers.

Since the program has become permanent, there is a lot of potential for community solar in Maryland. However, some challenges exist, especially around siting of community solar projects. SUN Action is supportive of the solutions proposed within HB 827 including a new "Distributed Generation Certificate of Public Convenience and Necessity" (DGCPCN) process.

SOLAR UNITED NEIGHBORS ACTION

SUN Action urges a favorable report on HB 827 to help lower Marylander's energy bills with more local solar energy from community solar. HB 827 will help streamline and accelerate community solar deployment that meets the standard siting and design conditions determined by the Power Plant Research Program. HB 827 will accelerate clean energy development in Maryland and help the state reach our ambitious goals including 14.5% local solar.

From,

**Liz Veazey**
Director of State Policy Campaigns

lveazey@solarunitedneighbors.org

**HB 827 - CBF - FAV.pdf**
Uploaded by: Matt Stegman
Position: FAV

# CHESAPEAKE BAY FOUNDATION

*Environmental Protection and Restoration*
*Environmental Education*

**House Bill 827**

**Solar Energy – Distributed Generation Certificate of Public Convenience and Necessity, Ground-Mounted Solar, and Small Solar Siting Workgroup**

| | | | |
|---|---|---|---|
| Date: | March 13, 2025 | Position: | **FAVORABLE** |
| To: | House Economic Matters Committee | From: | Gussie Maguire, MD Staff Scientist |

Chesapeake Bay Foundation (CBF) **SUPPORTS** House Bill 827, which would establish a Distributed Generation Certificate of Public Convenience and Necessity (DGSPCN) for distributed solar generation facilities and accompanying standard siting requirements.

Solar energy production vastly improves upon traditional fossil fuel power sources, but it is not without environmental impacts. Therefore, siting of solar projects must be carefully considered. Forest loss, loss of productive agricultural land, and mismanaged stormwater runoff have accompanied past solar projects.

Establishing standard siting as discussed in HB 827 would help minimize negative consequences in the future. The bill charges the state's Power Plant Research Program with a number of considerations for standard siting and design requirements, including achievement of the State's climate and renewable energy commitments, prohibition on forest clearance except under specific, minimal circumstances, and various facets of on-site stormwater management, such as soil compaction and loss of ground cover beneath panels.

The best possible locations for solar panels are on or above existing impervious surfaces and disturbed, degraded land such as brownfields. However, solar arrays have and will continue to be placed in a much wider variety of locations. Establishing a DGSPCN, with siting requirements that reflect the considerations listed in the bill, will help ensure that renewable energy generation does not come at the cost of forests or water quality.

**CBF urges the Committee's FAVORABLE report on HB 827.**

For more information, please contact Matt Stegman, Maryland Staff Attorney, at mstegman@cbf.org.

**PureSky Energy Maryland HB 827 testimony.pdf**
Uploaded by: Matthew Deal
Position: FAV

RE: HB 827 – Public Utilities - Distributed Generation Certificate of Public Convenience and Necessity

**Favorable**

Chair Wilson and members of the House Economic Matters Committee,

PureSky Energy (PureSky) provides this written testimony regarding House Bill (HB) 827. PureSky's position on this legislation is Favorable.

PureSky is a leading developer, owner, and operator of US community solar, C&I, and storage projects with headquarters in Denver, Colorado. Since entering the US market in 2016, the company has rapidly expanded its scale and currently operates a portfolio with a generation capacity of approximately 233 MWs across forty-four sites or under-construction projects expected to be completed in the short term. The company has a large pipeline of solar and battery storage projects across existing and new US markets, placing PureSky in a primary position within the distributed generation market. The company's mission is to make clean energy accessible and affordable to local communities across the United States while shaping a brighter, more sustainable future for generations to come.

We are committed to owning and operating our facilities throughout their entire lifecycle, prioritizing collaboration with landowners, municipalities, and other local stakeholders to foster valuable, long-term partnerships. We proudly serve nearly 9,000 community solar customers across three states, including 15% from low-to-moderate income households, by providing access to affordable solar energy. To date, we have saved our customers over five million dollars annually on electricity bills.

PureSky is actively developing distributed solar projects in the Maryland community solar market. We are grateful to this Committee for supporting the passage of HB 908 in 2023, which made community solar a permanent solution in Maryland. Because of that, we are exploring additional opportunities to partner with landowners to deploy distributed solar and storage facilities throughout the state.

HB 827, sponsored by Chair Clippinger, Delegate Charkoudian, and Delegate Fraser-Hidalgo, would create a Distributed Generation Certificate of Public Convenience and Necessity (DG-CPCN), that would streamline the permitting process for qualifying distributed solar projects between 2 and 5 megawatts. The bill directs the Power Plant Research Program (PPRP) to establish standard siting and design requirements through a stakeholder engagement process and for the Public Service Commission to consider that input in establishing the regulations and application requirements for a DG-CPCN. Finally, when processing a DG-CPCN application, the Commission must ensure that opportunities for public comment are available and conduct a public hearing.

518 17th Street, Suite 950, Denver, CO 80202, United States | +1 303 653 9805
10 Bay Street, Suite 816, Toronto, ON, M5J 2S3, Canada | + 1-289-633-1342
PureSkyEnergy.com

HB 827 aims to enhance transparency, efficiency, and consistency in permitting distributed solar projects in Maryland. PureSky has several projects currently under development in the state, and HB 827 will help facilitate the timely commencement of those projects, allowing them to benefit both landowners and subscribers.

PureSky appreciates Chair Clippinger and Delegates Charkoudian and Fraser-Hidalgo's leadership on HB 827 and continued support for distributed solar. PureSky also appreciates the Senate and House Leadership for taking up siting in SB 931 and HB 1036, which establish siting standards for solar and storage systems. HB 827 builds on the direction of the Leadership bill by providing a narrower solution specific to siting and administrative challenges for distributed solar projects that require (between 2-5 megawatts) a Certificate of Public Convenience and Necessity. This bill is an important next step to reducing barriers to distributed solar and achieving the energy and equity benefits of the permanent program.

**PureSky urges a favorable report on HB 827.**

Respectfully submitted,

Matthew Deal
Director, Markets & Policy
PureSky Energy
202.528.5008
Matthew.deal@pureskyenergy.com

518 17th Street, Suite 950, Denver, CO 80202, United States | +1 303 653 9805
10 Bay Street, Suite 816, Toronto, ON, M5J 2S3, Canada | + 1-289-633-1342
**PureSkyEnergy.com**

**Pivot Energy Testimony_HB 827_DGCPCN_FAV_3-13-2025**
Uploaded by: Sophia Hill
Position: FAV

Pivot Energy

**Re: HB 827 – Public Utilities – Distributed Generation Certificate of Public Convenience and Necessity (FAVORABLE)**

Chair Wilson and members of the House Economic Matters Committee,

Pivot Energy submits testimony in support of House Bill (HB) 827, a targeted and pragmatic solution to modernize Maryland's permitting approach for community solar projects between 2 and 5 megawatts (MW), while ensuring responsible siting and continued community engagement. We respectfully urge a favorable report on HB 827.

## About Pivot Energy

Pivot Energy is a renewable energy provider and independent power producer that develops, finances, builds, owns, and manages solar and energy storage projects. We have been participating in Maryland's community solar market since 2017 and maintain an office in Elkridge, Maryland. Nationally, Pivot has over 3.5 gigawatts (GWs), nearly 1,800 solar projects completed or under development. Pivot is a US-based, Certified B-Corporation that proudly follows a corporate strategy aimed at providing a positive impact on society as measured by Environmental stewardship, Social leadership, and responsible Governance factors.

## The Challenges with Maryland's Current CPCN Process

Maryland's Certificate of Public Convenience and Necessity (CPCN) process, while effective for large utility-scale projects, is creating significant barriers for community solar development. Despite their relatively uniform size and design, all community solar projects must undergo the CPCN's adjudicated review process, requiring extensive evidentiary proceedings, legal filings, and procedural hurdles. This process often takes nearly a year, driving up costs, creating uncertainty for developers like us, and straining state agencies responsible for application reviews.

The recent growth of community solar, and associated rise in the number of CPCN applications for such projects, is compounding these challenges. Prior to July 2024, Pivot Energy had not developed any projects that qualified for review under Maryland's CPCN process. As of March 2025, Pivot has submitted three CPCN applications and plans to submit ten more in the coming months, all for community solar projects sized between 2 and 5 MW. The increasing volume of applications is further slowing development and overburdening regulators. Without reform, the CPCN process will remain an obstacle to developers, strain state agencies, and hinder Maryland's ability to meet its renewable energy goals.

## HB 827: Right-Sizing the Permitting Process for Community Solar

HB 827 creates a Distributed Generation Certificate of Public Convenience and Necessity (DGCPCN), providing a streamlined permitting path for community solar projects between 2-5 MW that adhere to high-bar standards. The bill does not reduce oversight. Rather, it ensures that qualifying projects that meet predetermined standards can proceed efficiently while maintaining ample opportunities for public input.

**Key provisions of HB 827:**

- **Standards for High-Quality Development:** The Power Plant Research Program (PPRP) will develop standard siting and design requirements, as well as standard licensing conditions, through a stakeholder engagement process. These standards, once adopted by the Public Service Commission (PSC) through a formal and public process, will guide the regulations and application requirements for a DGCPCN, ensuring consistency and accountability.
- **A More Efficient Pathway for Qualified Projects**: Projects that meet these rigorous standards will have a clearer, more predictable permitting process—reducing administrative burdens while maintaining necessary regulatory oversight and public input.
- **Incentivizing Best Practices:** Developers like us will be motivated to meet PPRP's high standards in order to access the streamlined process, fostering responsible solar development across Maryland.
- **Maintaining Oversight and Accountability**: The PSC will retain full discretion in granting DGCPCNs, ensuring that only projects aligned with Maryland's energy and environmental goals are approved, and considering public input in their decision. Projects that fail to meet the criteria will revert to the traditional CPCN process.
- **Continued Public Engagement:** The development of standards and the DGCPCN process itself will include opportunities for public input via comments and hearings.

## Conclusion

HB 827 represents a smart and necessary step forward, ensuring that Maryland's permitting framework evolves to meet the needs of today. By balancing efficiency with strong environmental and community safeguards, this bill will create regulatory certainty, reduce administrative burdens, and accelerate the responsible growth of community solar in Maryland.

For these reasons, I respectfully urge the Committee to issue a favorable report on HB 827.

Thank you for your time and consideration.

Sincerely,

Sophia Hill
Senior Manager of Policy & Market Strategy, Eastern Region
shill@pivotenergy.net
Pivot Energy
6865 Deerpath Rd, Elkridge, MD 21075

**HB0827-ECM_MACo_SWA.pdf**
Uploaded by: Dominic Butchko
Position: FWA

MARYLAND Association of COUNTIES

# House Bill 827

*Solar Energy - Distributed Generation Certificate of Public Convenience and Necessity, Ground-Mounted Solar, and Small Solar Siting Workgroup*

MACo Position: **SUPPORT WITH AMENDMENTS**

To: Economic Matters Committee

Date: March 13, 2025

From: Dominic J. Butchko

The Maryland Association of Counties (MACo) **SUPPORTS** HB 827 **WITH AMENDMENTS.** This bill would establish an expedited approval process for solar energy generating systems between 2MW and 5MW.

For more than a year, county officials and professionals, in partnership with MACo, have worked closely with the administration, advocacy groups, and industry leaders to advance Maryland's renewable energy goals through clear, effective, and balanced policies. Counties remain steadfast in their commitment to solutions that address shared challenges and serve the best interests of our communities.

With the amendments developed by the bill sponsors, MACo, industry stakeholders, and the Administration, HB 827 represents a smart, well-balanced approach to accelerating the deployment of small- and medium-scale solar projects. These amendments ensure that increased efficiency does not come at the expense of community input, environmental protections, or other key considerations.

MACo extends its appreciation to the House and Senate sponsors, as well as stakeholders, for their collaboration in addressing county concerns. Counties remain unwavering in their commitment to being the State's partner in government, working alongside the General Assembly to achieve better outcomes for our shared constituents.

If enacted with amendments, HB 827 is a smart and well-balanced policy that will forward Maryland's energy commitments without sacrificing other goals and considerations. For this reason, MACo urges the Committee to give HB 827 a **FAVORABLE WITH AMENDMENTS** report.

**HB 827_ FAV WAMEND_PSC.pdf**
Uploaded by: Frederick Hoover
Position: FWA

**STATE OF MARYLAND**

PUBLIC SERVICE COMMISSION

Chair C.T. Wilson
Economic Matters Committee
Room 231 House Office Building
Annapolis, MD 21401

**RE: HB 827 – Favorable with Amendments – Solar Energy - Distributed Generation Certificate of Public Convenience and Necessity**

Dear Chair Wilson and Committee Members:

The Public Service Commission (the Commission) requests a favorable report for House Bill 827 (HB 827) with the amendments detailed in this testimony.

The Commission regulates certificates of public convenience and necessity (CPCNs) for generating systems greater than two megawatts. HB 827 would amend § 7-207 of the Public Utilities Article to establish a new type of "distributed generation" CPCN (DG-CPCN) for the construction and operation of community solar energy generating systems (CSEGS) with capacities between two and five megawatts (MW) that are not located within a municipal corporation. The bill would require the Department of Natural Resources (DNR) Power Plant Research Program (PPRP) to develop and propose, for submission to the Commission, standard siting and design requirements and standard licensing conditions for DG-CPCN projects, subject to public comments, within one year of the bill's effective date. The Commission would subsequently be required to adopt standard siting, design, and licensing regulations within one year of PPRP's submission to the Commission. The bill vests the Commission with responsibility for overseeing the proceedings and ultimate approval of DG-CPCN applications.

Section 7-207.4(C)(1), as proposed, requires the Commission, by July 1, 2027, to adopt regulations, based on the proposal submitted by PPRP. Section 7-207(B) would require PPRP to submit to the Commission, by July 1, 2026, proposed regulations for the standard siting, design, and licensing requirements. In developing the proposal, PPRP would be required to consider criteria enumerated in the bill. The Commission recommends against prescriptive criteria that may make adjudication of unique projects difficult. It may be useful to provide PPRP with added flexibility as to what requirements should be considered for a DG-CPCN application, due since the list of requirements within the statute may not be exhaustive. The Commission also suggests consideration of electric distribution grid reliability, especially as it relates to distribution grid interconnection, when developing siting, design, and licensing conditions for DG-CPCN applications.

Section 7-207.4(F) would require PPRP to submit an analysis on whether a DG-CPCN application meets the established application requirements to the Commission within 90 days after the date that a DG-CPCN application is filed with the Commission. Section 7-207.4(G) would require that the Commission schedule a hearing on a DG-CPCN application within 60 days after PPRP submits their analysis and determination on the DG-CPCN application to the Commission. This timeframe to fully analyze a DG-CPCN application and schedule a hearing within 150 days may not be feasible given the analysis required of each project application, even with project standardization, due to unique issues that may arise, as well as the sheer volume increase in applications expected as a result of this legislation. The Commission suggests that the bill provide PPRP and the Commission with the flexibility to determine these timeframes or otherwise allow for increased time for PPRP and the Commission.

Section 7-207.4(G)(2)(II) states that the Commission shall issue a DG-CPCN to an applicant if the Commission determines that the applicant satisfies the established standard siting and design requirements. The Commission notes that, in the future, there may be issues with a DG-CPCN application unforeseen by the established standard siting and design requirements. In such a scenario, the nondiscretionary language of § 7-207.4(G)(2)(II)would require the Commission to grant the DG-CPCN, notwithstanding the unique and unforeseen issue(s), if the project otherwise meets the standard siting and design requirements. The Commission notes that increased flexibility in approving a DG-CPCN may be useful.

The Commission has been working with the sponsors extensively on this bill and understands that amendments have been proposed that may address some of the concerns mentioned in this testimony. The Commission will continue to work with sponsors on this bill moving forward.

The Public Service Commission appreciates the opportunity to provide testimony for your consideration for bill HB 827. We request a favorable report with support for the amendments detailed above. Please contact Christina Ochoa, Director of Legislative Affairs at christina.ochoa1@maryland.gov if you have any questions.

Sincerely,

Frederick H. Hoover, Chair
Maryland Public Service Commission

## HB827 Solar Energy - Distributed Generation Certif

Uploaded by: Laurie McGilvray

Position: FWA

**Committee: Economic Matters**
**Testimony on: HB827 – Solar Energy - Distributed Generation Certificate of Public Convenience and Necessity, Ground-Mounted Solar, and Small Solar Siting Workgroup**
**Organization: Maryland Legislative Coalition Climate Justice Wing**
**Submitting: Richard Deutschmann**
**Position: Favorable With Amendments**
**Hearing Date: March 13, 2025**

Dear Chair Wilson and Members of the Committee:

Thank you for your consideration of our testimony today in support of HB827. The Maryland Legislative Coalition Climate Justice Wing, a statewide coalition of nearly 30 grassroots and professional organizations, urges you to vote favorably on HB827, with suggested amendments.

The Renewable Portfolio Standard (RPS) calls for 14.5% of Maryland's clean electricity to be contributed by solar energy by 2030, but the State has repeatedly fallen significantly short of this goal. According to the 2023 Maryland Climate Pathways Report, both wind and solar generation must increase fivefold by 2031, with solar accounting for 33% of in-state energy generation. Additionally, Community Solar has been an incredibly important market segment of the industry in Maryland, addressing the needs of low-to-moderate income residents, renters, and those who are not able to have solar installed on their property. HB827 aims to strengthen Community Solar in the state, by creating a streamlined permitting process for these relatively smaller projects.

HB827 creates a new Distributed Energy Certificate of Public Convenience and Necessity (DGCPCN) permitting structure, targeted specifically at Community Solar projects between 2-5MW. The current CPCN permitting process was designed for larger power generation and other public projects, which can be arduous and time-consuming for smaller developers. The proposed legislation would task the Power Plant Research Program (PPRP) with creating standard siting and design requirements, and standard licensing conditions in order to receive a DGCPCN. These requirements would include reasonable setbacks, landscaping and screening, deforesting limits, and stormwater management. The DGCPCN would continue to engage a robust process of public comment and hearings, in order to gather input from local communities. Local governing bodies will still have responsibility over issuance of site plan, stormwater management and erosion/sediment control approvals, along with building and electrical permits. However, the legislation would also impose strict time limits, given the state's interest in incentivizing new, in-state power generation. We believe that this legislation will rightsize the permitting process for these Community Solar projects, create predictable design standards for approval, speeding up deployment of critical generation assets in the state, and ensuring

continued access to clean, renewable energy especially for low-to-moderate income Maryland residents.

We understand that sponsor amendments are being worked out in committee, and we think it is important that they address a compromise balance between clearing a path for clean energy development and local zoning concerns. At a minimum, the bill should provide an exemption to the prohibition on county regulation or a specific PSC review process in instances where a county holds an agricultural preservation or forest or other conservation easement on a property proposed for solar development. Easements represent county ownership of a right or rights in the bundle of property rights that should not be rendered meaningless by this bill. Our testimony does not directly address these amendments as we will not have a chance to fully review before the hearing.

For all of these reasons, we strongly support HB827 with changes suggested, and urge a FAVORABLE WITH AMENDMENTS report in Committee.

350MoCo
Adat Shalom Climate Action
Chesapeake Earth Holders
Climate Parents of Prince George's
Climate Reality Project
ClimateXChange – Rebuild Maryland Coalition
Coming Clean Network, Union of Concerned Scientists
DoTheMostGood Montgomery County
Echotopia
Elders Climate Action
Fix Maryland Rail
Glen Echo Heights Mobilization
Greenbelt Climate Action Network
HoCoClimateAction
IndivisibleHoCoMD
Maryland Legislative Coalition
Mobilize Frederick
Montgomery County Faith Alliance for Climate Solutions
Mountain Maryland Movement
Nuclear Information & Resource Service
Progressive Maryland
Safe & Healthy Playing Fields
The Climate Mobilization MoCo Chapter
Unitarian Universalist Legislative Ministry of Maryland
WISE

# 20250313 HB 0827 Solar Energy Distributed Generati

Uploaded by: Larry Porter

Position: UNF

CAROLINECOUNTY
you belong here
CAROLINE COUNTY COMMISSIONERS OFFICE

JAMES TRAVIS BREEDING, PRESIDENT
LARRY C. PORTER, VICE PRESIDENT
NORMAN FRANKLIN BARTZ, III., COMMISSIONER
109 Market Street, Room 123
Denton, Maryland 21629

**House Bill 0827**

*Solar Energy - Distributed Generation Certificate of Public Convenience and Necessity, Ground-Mounted Solar, and Small Solar Siting Workgroup*

Position: **UNF** Date: **March 13, 2025** To: **Economic Matters**

On behalf of the Caroline County Commissioners, we write to express our **strong opposition** to House Bill 827, which seeks to establish a **Distributed Generation Certificate of Public Convenience and Necessity (DGCPCN)** while overriding local land use authority on solar energy projects.

Caroline County has already implemented responsible solar regulations that balance renewable energy development with the protection of our rural character, farmland preservation, and community interests. This bill threatens to undermine our local autonomy by prohibiting counties from enacting zoning laws that restrict or regulate ground-mounted solar facilities under 2 megawatts.

Key Concerns with HB 827

1. Undermines Local Control & Land Use Planning
    - Caroline County has carefully crafted solar policies to ensure responsible development while protecting prime agricultural land and rural communities.
    - HB 827 removes the ability of counties to regulate smaller solar projects, forcing rural counties to accept projects that may not align with their land use priorities.
2. Threat to Farmland & Rural Character
    - Caroline County's economic and cultural identity is rooted in agriculture. Large-scale and unchecked solar development on productive farmland undermines generations of farming heritage.
    - Encouraging solar projects without local oversight could lead to fragmentation of farmland and limit future agricultural use.
3. One-Size-Fits-All Approach Does Not Work for Rural Counties
    - What works for urban and suburban areas may not work for rural agricultural counties like Caroline.
    - HB 827 disregards the unique zoning, environmental, and land use policies already established by local jurisdictions.
4. State Preemption Sets a Dangerous Precedent

- Caroline County supports renewable energy, but it must be implemented through a process that respects local decision-making.
- The Supreme Court of Maryland has previously ruled in *Board of County Commissioners v. Perennial Solar, LLC (2019)* that state law preempts local solar zoning authority. This bill further erodes local governance by expanding preemption even more.

House Bill 827 is an overreach that disregards the careful planning efforts of rural counties like Caroline. While we recognize the importance of renewable energy, this bill imposes a top-down approach that threatens farmland, dismisses local regulations, and weakens county authority. We strongly urge the General Assembly to reject HB 827 and instead allow local governments to determine the best approach for solar development within their jurisdictions.

Sincerely,

J. Travis Breeding, President

OFFICE OF THE COUNTY COMMISSIONERS
Katheleen Freeman, County Administrator | Daniel Fox, Deputy Administrator | R. Stewart Barroll, County Attorney
109 Market Street, Room 123 | Denton, Maryland 21629 | (410) 479-0660 | info@carolinemd.org