

**FAVORABLE – House Bill 1414  
Building Energy Performance Standards – Public Safety, Emergency, and  
Public Utility Buildings – Exclusion  
House Environment and Transportation Committee**

Columbia Gas of Maryland, Inc. (Columbia) supports House Bill 1414. The legislation alters the definition of “covered building” for building energy performance standards, or BEPS, to exclude public buildings designated by a federal, state or local government as a public safety building, emergency storm shelter or public utility buildings.

Since May of 2023, Columbia has been significantly engaged on and concerned with the financial impact of the BEPS regulations to our customers who own or operate buildings that are 35,000 square feet or larger in Maryland. The estimated costs are staggering. House Bill 1414 would reduce the significant financial impact state and local governments currently face if they own a building that falls under the BEPS regulations.

The BEPS regulations will effectively prohibit the use of natural gas or fossil fuel equipment and force covered building owners to incur major costs to replace such appliances with electric alternatives. On a statewide basis, electrification retrofits are expected to cost covered Maryland building owners billions of dollars.

The MDE’s own estimate of economic impact in the final regulations calculate covered building owners will spend more than \$5.7 billion on efficiency and electrification measures to achieve \$1.2 billion in energy cost savings without an Energy Use Intensity (EUI) standard. Those estimates climb to more than \$15 billion spent on efficiency and electrification measures to provide approximately \$9 billion in energy savings with the addition of EUI standards.

These significant costs will ultimately be paid for by all Marylanders, such as residential rental tenants, small business owners who rent space, college students and parents, medical patients at hospitals and offices, parents with children enrolled in pre-school or daycare facilities, senior citizens in a senior living community or care facility, owners of condominium units and Marylanders who buy groceries – just to name some of those impacted by the billions of dollars in new costs that will be incurred due to the BEPS.

During an October 9, 2024, public hearing on the BEPS regulations a condominium organization testified it would cost their association an estimated \$5 million to \$8 million just to replace gas stoves currently in use. Another condominium organization estimated it would cost their association \$54 million in order to attempt to comply, and that even if they complete these renovations, there is no guarantee they will meet the strict compliance targets set by the BEPS.

Furthermore, MDE’s economic impact study was done prior to the July 30, 2024, PJM Interconnection power market auction, which produced a \$269.92/MW-day price for most of the PJM footprint, compared to \$28.92/MW-day for the prior auction (a more than 800% increase). We are confident the MDE energy costs savings estimates are now overstated as a result of these increasing electricity costs, and the public and Maryland General Assembly should be aware of the new economic impact to building owners.

Columbia understands Maryland's ambitious goals to reduce greenhouse gas emissions and the requirements of the CSNA. However, the final BEPS regulations represent major changes to the state's building and energy standards, while adversely affecting many Marylanders with the imposition of serious financial burdens.

Columbia continues to believe the BEPS regulations significantly exceed what is authorized by the CSNA, and are not justified, feasible or economically realistic. Columbia believes the current BEPS regulations should be withdrawn. More practical and lawful BEPS regulations -- that reduce greenhouse gas emissions using an "all-of-the-above" energy approach, use new and emerging technologies, and limit the financial costs to Marylanders -- should be proposed.

Columbia believes the requirements of House Bill 1414 are appropriately and reasonably crafted policies related to reducing the financial impact of BEPS to state and local governments and their taxpayers and supports the legislation.

March 5, 2025

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