



WRITTEN TESTIMONY OF ENERGYHUB

HB 1532 Position: Favorable with Amendments

Senate Education, Energy, and Environment Committee

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EnergyHub respectfully submits this written testimony regarding HB 1532. EnergyHub is one of the largest residential virtual power plant ("VPP") operators in North America, providing grid-edge software and services that enable utilities to aggregate and dispatch distributed energy resources ("DERs"), including batteries, electric vehicles, EV chargers, thermostats, and other flexible loads. We have a long history of partnering with Maryland utilities and stakeholders to deliver customer-centric, cost-effective demand flexibility solutions, with nearly 150,000 devices currently enrolled in Maryland.

EnergyHub recognizes that rising utility costs are a legitimate concern for Maryland ratepayers. While we appreciate the intent of HB 1532, we are unable to support the bill as currently written. We believe that targeted amendments in three areas – funding protections, program continuity, and statutory clarity – would meaningfully improve the bill and better serve Maryland ratepayers, utilities, and program participants.

### **Recommended Amendment #1: Preserve Funding for EmPOWER Maryland**

EnergyHub recommends that HB 1532 be amended to include explicit protections against the reduction or redirection of funding currently dedicated to EmPOWER Maryland.

The EmPOWER surcharge delivers net savings to both program participants and the broader ratepayer base. By reducing energy consumption and peak demand, EmPOWER programs reduce the need for capital-intensive grid infrastructure investments – costs that would otherwise be recovered

through utility rates. Reducing EmPOWER funding would likely result in higher infrastructure costs that are passed on to all ratepayers over time.

### **Recommended Amendment #2: Clarify the Statutory Home for Demand Response Programs**

HB 1532 as written does not clearly establish where demand response and demand flexibility programs will reside as Maryland's energy policy framework evolves. EnergyHub recommends that the bill be amended to designate an explicit statutory home for these programs – whether within EmPOWER Maryland, the DRIVE Act, or both.

As noted in EnergyHub's February 2026 comments in PSC Case No. 9761, EmPOWER Maryland and the DRIVE Act are complementary programs. Positioning the DRIVE Act as the framework for dispatchable flexibility, while maintaining EmPOWER's role in energy efficiency, can improve both customer experience and system outcomes. Codifying this relationship would provide regulatory clarity for utilities, aggregators, and customers, and reduce the risk of programs being administratively displaced during any transition.

### **Recommended Amendment #3: Include Continuity of Service Provisions**

To the extent HB 1532 contemplates changes to how demand response or VPP programs are administered, EnergyHub recommends that the bill include

provisions to ensure continuity of service for currently enrolled participants. Specifically, we recommend the bill address the following:

- No interruption in program enrollment or dispatch operations during any transition period;
- Protection of existing customer enrollments, so that participants are not required to re-enroll or experience service disruptions;
- Preservation of existing operational infrastructure, including the Edge DERMS platforms that currently support nearly 150,000 enrolled devices in Maryland; and
- A defined transition timeline with clear milestones and stakeholder input opportunities.

These provisions would protect the investments already made by utilities, aggregators, and customers, and help maintain the operational integrity of Maryland's demand flexibility programs during any period of change.

We welcome the opportunity to work with the Committee and other stakeholders to develop language that addresses these concerns, and we remain committed to supporting Maryland's demand flexibility goals.

Respectfully submitted,



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