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March 3, 2026

The Honorable Brian J. Feldman
Chair, Education, Energy, and the Environment Committee
2 West Miller Senate Office Building
Annapolis, Maryland 21401

RE: Senate Bill 598 – *Electric Companies - Cost Containment Plans - Requirement*

FAVORABLE W/AMENDMENT

Dear Chair Feldman and Members of the Committee,

I am writing in my capacity as the Legislative Chairman of the Building Owners and Managers Association of Greater Baltimore (BOMA) to respectfully request an amendment to Senate Bill 598.

BOMA represents owners and managers of all types of commercial property, comprising well over 100 million square feet of office space in Baltimore and Central Maryland.

The BOMA request is directed specifically at the definition of “grid flexibility – enabled building electrification and efficiency,” found on page 3, lines 20 through 26 of the bill.

This definition specifically directs that credit or preference be given to programs or measures under the bill that “encourage the use of the electric grid in off-peak hours and mitigate use during peak demand.” Such programs or measures are listed on page 4, beginning at line 27 through line 11 on page 5. While this factor is one component of several that may be chosen, it is extremely important to BOMA members.

Commercial office buildings operate during typical business hours. These typical business hours often include times of peak demand for electricity usage. While the cost containment goal of Senate Bill 598 is laudable, BOMA respectfully submits that it must also be realistic. We ask that the bill be specifically amended to take into account building usage when developing a cost containment plan, and permit commercial office buildings the flexibility necessary to continue their operations without onerous and unrealistic requirements. We are happy to work with the bill sponsor and the Committee in addressing this important request.

Very truly yours,

A handwritten signature in black ink, appearing to read "Tim O'Donald".

Tim O'Donald
Chair, BOMA Legislative Committee

cc: Bryson F. Popham, P.A.