



February 26, 2025

112 West Street
Annapolis, MD 21401

OPPOSE – SB749- Residential Retail Customer and Retail Electricity Suppliers- Definition and Alterations.

Potomac Electric Power Company (Pepco), and Delmarva Power & Light Company (Delmarva Power) *oppose* **SB749- Residential Retail Customer and Retail Electricity Suppliers- Definition and Alterations**. Pepco and Delmarva Power support strong consumer protections and clear billing practices; however, SB 749 would create avoidable confusion and operational risk by altering Maryland’s consolidated billing structure and creating a new definition of “residential retail customer” that is duplicative of the retail electric customer definition established in Maryland statute.

SB 749 would require utilities to provide Utility Consolidated Billing (UCB) access to third-party suppliers under expanded conditions. Maryland has worked for years to strike the right balance between customer convenience and transparency. While SB 749 does not replace Maryland’s billing framework, Pepco and Delmarva Power are concerned that expanded reliance on UCB for third party supply charges would reduce transparency and shift costs and risk to customers who do not participate in competitive supply. Any move toward supplier consolidated billing functionality is not a turnkey change. It would require significant system integration, testing, and ongoing support. If SB 749 were implemented, we strongly recommend that suppliers fully fund the development, implementation, and maintenance costs – so that customers are not subsidizing billing capabilities that benefit suppliers. Additionally, billing system changes and ongoing support risk being recovered from the broader rate base – customers who never chose a

Additionally, SB 749 would create a new definition called “residential retail customer,” in Section 1-101 of the Public Utilities Article, which will be duplicative of the existing definition of “retail electric customer” in that same section, leading to confusing outcomes since the “retail electric customer” term relied upon across Maryland’s utility and supplier regulatory framework. Redefining this foundational term risks unintended ripple effects well beyond the bill’s stated purpose; resulting in different “residential” definitions for different contexts, which makes the system harder to administer and harder for customers to navigate.

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Exelon (Nasdaq: EXC) is a Fortune 200 company and the nation’s largest utility company, serving more than 10.5 million customers through six fully regulated transmission and distribution utilities — Atlantic City Electric, BGE, ComEd, Delmarva Power, PECO, and Pepco. Exelon’s 20,000 employees dedicate their time and expertise to supporting our communities through reliable, affordable and efficient energy delivery, workforce development, equity, economic development and volunteerism.

If the intent is to strengthen protections for certain customers, Pepco and Delmarva Power recommend doing so without redefining a core statutory term that has broad downstream implications. We request amendments clarifying that any supplier that elects utility consolidated billing must fully reimburse utilities for all incremental implementation and ongoing support costs. Additionally, Pepco and Delmarva Power respectfully request amendments that would maintain the existing statutory definition of “electric customer”

Pepco and Delmarva Power respectfully request an unfavorable report on SB 749.

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