



March 23, 2026

MAREC ACTION TESTIMONY HB1532: FAVORABLE WITH AMENDMENTS

Chair Feldman, Vice Chair Kagan, members of the Education, Energy, and the Environment Committee,

MAREC Action (informally, “Mid-Atlantic Renewable Energy Coalition”) writes in as favorable with amendments on HB1532, the Utility RELIEF Act. MAREC Action is a Maryland-based coalition of over 50 utility-scale solar, wind, and battery storage developers, owner-operators, and manufacturers dedicated to the growth and development of renewable energy across the PJM grid region.

We believe that HB1532—with key amendments that will be detailed below—would be effective at promoting deployment of large-scale solar and storage resources over the next two years. MAREC Action is most interested in the following sections of this omnibus legislation:

Section 4–212. (G)

This section of HB1532 requires that Data Center Large Load Customers provide significant interconnection capacity for the data center’s load through behind-the-meter energy storage, demand response, OR purchased capacity with new storage facilities or carbon-free generation within the load zone or local delivery area. MAREC Action’s members see data center contract opportunities as a significant market driver for solar, wind and storage assets. A state law requirement would help clean energy developers sign contracts to deliver new projects to the grid.

We recommend the following amendments to clarify and strengthen this section:

- **Define what “significant interconnection capacity for the data center’s load” means.** From a clean energy developer perspective, defining “significant” as 100 percent of the new capacity coming from the listed storage and carbon-free sources would maximize the market opportunity and the economy of scale for potential contracts. Data center contracts in other states have resulted in significant renewables + storage deals.¹
- **Clarify that the additional capacity for data centers would be paid for only by the data centers through a new bilateral contract between the data center and storage or carbon-free generation project developers.** If the storage or capacity was procured by a load serving entity on behalf of a data center, there could be a risk of stranded assets leading to other ratepayers being on the hook if a data center fails to materialize.

¹ <https://www.canarymedia.com/articles/batteries/gigantic-form-energy-battery-google-minnesota>



Section 9–20E–02.

This section establishes annual, competitive, low-bid auctions for new solar, solar + storage, and land-based wind projects paid for by drawing from Alternative Compliance Payments (ACPs) to remain cost-neutral for ratepayers. MAREC Action supports this provision, as we believe it would maximize the chances of the roughly 230 megawatts of utility-scale solar projects in Maryland with late-stage PJM queue positions to break ground and start construction.

Significantly, it is not clear whether this program would allow for awardees to also receive Solar Renewable Energy Certificates (SRECs). **The ACP auction will not work to drive short-term deployment if winning bidders do not also qualify for SRECs and we strongly recommend a clarifying amendment.** SREC tradability and market value are key and predictable drivers of project deployment in Maryland. Bids coming into the auction would adjust based on whether SRECs are also available, auctions would either see lower bids (to account for the “missing money” above SRECs) or higher bids (to account for the lack of SRECs). Given this program, as drafted, is authorized for \$100 million in FY 2027 and 2028, the state would get more megawatts of steel in the ground if SRECs continue to be available for bidders. The ratepayer neutral approach of the bill would not change in either scenario.

We also request a small, but important, technical amendment to HB1532’s ACP auction language to clarify that bids should be evaluated based on the “nameplate capacity” of projects under consideration rather than “the actual amount of megawatts to be generated”. Nameplate capacity will allow for a much simpler apples to apples comparison between bids. Basing bids on estimated generation (which is measured in megawatt-hours) would require each developer to estimate production for the life of a project and may result in diverging assumptions skewing competition.

Separate from the short-term merits of HB1532, we are very concerned this limited two-year program (even with the potential for future appropriation extensions) is unlikely to spur developers to invest in large-scale projects beyond the existing PJM queue. Utility-scale solar projects take three to five years to develop and build, including two years in the PJM queue. Companies are actively preparing and submitting applications for queue positions for the “Cycle 1” queue by April 27, 2026. See the chart² at the top of the next page for reference:

² <https://www.pjm.com/planning>



Cycle Timeline

As of 3.18.2026 10:21 a.m. EPT

Phase	Transition Cycle 1			Transition Cycle 2			Cycle 01	
	Start Date	End Date	Duration	Start Date	End Date	Duration	Start Date	End Date
Fast Lane End Date <i>executed by Developer & TO OR filed unexecuted</i>	12/15/2023	4/18/2025						
Application Deadline	N/A	N/A	N/A	12/17/2024	12/17/2024	0	4/27/2026	4/27/2026
Application Review	N/A	N/A	N/A	12/18/2024	7/8/2025	201	4/28/2026	7/27/2026
Model Posting	2/1/2024	2/1/2024	0	6/6/2025	6/6/2025	0	6/26/2026	6/26/2026
Phase I	1/22/2024	5/20/2024	120	7/7/2025	10/31/2025	117	7/28/2026	11/24/2026
Decision Point I	5/21/2024	6/20/2024	31	11/3/2025	12/2/2025	30	11/25/2026	12/24/2026
Phase II	6/21/2024	12/20/2024	183	12/3/2025	6/1/2026	181	1/28/2027	7/26/2027
Decision Point II	12/23/2024	1/21/2025	30	6/2/2026	7/1/2026	30	7/27/2027	8/25/2027
Phase III	4/21/2025	9/19/2025	152	7/2/2026	12/28/2026	180	8/26/2027	2/22/2028
Decision Point III	8/22/2025	10/21/2025	30	12/29/2026	1/27/2027	30	2/23/2028	3/23/2028
Final Agreement Negotiation	9/22/2025	11/20/2025	60	12/29/2026	2/26/2027	60	2/23/2028	4/24/2028

Notes:

- Transition Cycle 2, Phase III start date is dependent on Transition Cycle 1 GIAs executed or withdrawn
- Cycle 01, Phase I start date is dependent on Transition Cycle 2 DP2 close, Cycle 01 Review completion and Cycle 01 Model being posted for 30 days
- Cycle 01, Phase II start date is dependent on Transition Cycle 2 DP3 close
- Cycle 01, Phase III start date is dependent on the conclusion of the Transition Cycle 2 Final Agreement Negotiation Phase

Legend
Actual date
 Projected date

If developers don't submit queue positions by April, there will be a "valley of death" for utility-scale solar deployment in Maryland in around two years when projects exit "Cycle 1" (so called because it is the first new queue cycle following queue reform implemented by PJM years ago). We are doubtful that HB1532's proposed two-year program will be sufficient to incent developers to put substantial capital at risk to establish queue positions for projects that will be lucky to even exit the queue in two years. Developers must put significant capital on the line to hold queue positions, starting with hundreds of thousands of dollars and likely increasing to millions as projects advance through the queue. PJM queue reform made these securities much more expensive than in past years to reduce speculative projects, so we are in somewhat uncharted territory for this first post-transition queue. Without a clear, long-term policy signal, developers will hesitate to submit Maryland queue positions and will likely look to other markets with less transmission grid congestion or greater land availability.

To address the long-term market and to preserve a utility-scale solar industry in Maryland beyond the next two years, we recommend amending the large-scale solar competitive procurement provisions of the Affordable Solar Act (SB0341/HB341) into HB1532. The competitive procurement construct in the Affordable Solar Act is similar to last year's Next Generation Energy Act transmission-connected storage procurement, which has drawn bids totaling more than 1,300 megawatts and has been exceptionally well-managed thus far by Maryland's Public Service Commission. There are some differences (including major, but not unworkable, changes to the SREC market in the Affordable Solar Act) but the overall concept is the same—rightsizing incentives through competition to discover the lowest possible price needed to build utility-scale solar in Maryland.



7-207.

We applaud the inclusion of stronger requirements for Grid Enhancing Technologies (GETs) and Advanced Transmission Technologies (ATTs) in this section of HB1532. Expanding transmission capacity in Maryland, both through making the most of existing grid assets and expanding the transmission grid where prudent, is essential to bringing more power generation online in Maryland and for maintaining reliability. We are however concerned that, without amendments, this section may have less of an effect than the sponsors' intend.

The high-performance conductors (a form of GETs/ATTs) definition in HB1532 should not include “advanced steel core conductors”, which are already commonly used to our knowledge. Additionally, all three of the listed criteria for high performance conductors on pg29 of the bill (House passed version) should be required, which could be implemented by changing the OR on line 24 into an AND.

We are also evaluating if further amendments could be made to introduce more competitive opportunities for storage-as-a-transmission-asset projects, but we are still workshopping language.

For these reasons MAREC Action is favorable with amendments on HB1532. We think Utility RELIEF Act has strong potential and we look forward to working with the committee to implement these and other amendments to deliver the best possible outcome for ratepayer affordability.

Thank you,

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