

March 23, 2025

Honorable Brian J. Feldman, Chair  
Honorable Cheryl Kagan, Vice Chair  
Senate Education, Energy & Environment Committee  
Senate Office Building  
Annapolis, Maryland 21401

### **HB 1532 – FAVORABLE WITH AMENDMENT**

Dear Chair Feldman, Vice Chair Kagan and Members of the Senate Education, Energy and Environment Committee,

TurningPoint Energy ("TPE") is a solar and battery storage development and investment company, with over 1 gigawatt of community solar developed across the United States and 21 megawatts in Maryland alone. We were proud to participate in Maryland's community solar pilot program since its inception in 2015 and continue to invest heavily in the state's clean energy future.

We appreciate Speaker Peña-Melnyk setting a goal of 6,000 MW of distributed energy deployment in Maryland. TurningPoint Energy, as well as our colleagues in the industry, appreciate the discussions to date we have had with her office and Environment & Transportation Committee with respect to net energy metering.

**We respectfully request that the Senate EEE Committee make the following amendments to the bill in order to ensure that Maryland may continue to deploy community solar over the next three years and beyond.**

1. **Set prospective caps in Delmarva Power and Potomac Edison territories in order to allow mature projects to complete development.**
  - a. The 3,000 net energy metering cap set in 2021 is a statewide cap, which informed how community solar projects are being developed in the state.
  - b. By allowing projects that have already made substantial investments in these territories to proceed will ensure that Maryland's most mature distributed energy projects will reach operation.
2. Address any potential utility or permitting delays by **ensuring that the PSC has discretion to extend project deadlines** based on delays outside the control of a community solar project developer.
  - a. There are several factors outside of a developers' control that may preclude their ability to reach commercial operation by July 1<sup>st</sup>, 2029. By authorizing the PSC to offer an extension for good-cause, developers can feel comfortable making substantive investments into project development.
3. **Protect the investments already made and contracts already signed** based on the current net metering program by ensuring that those projects remain under the current program's rules through the operating life of the system.

- a. If there is no clear timeline for the length of term by which an operational or mature project is under the current net metering tariff, project financing will not move forward and operational projects may be in breach of contract.
  - b. TPE recommends that a project under the current net metering tariff should remain under that tariff through project decommissioning, or the expected life of the project such as thirty-five years.
4. **Establish a date certain** of no earlier than July 1, 2027 for community solar projects to qualify for the permanent program queue and pay the initial interconnection deposit to the electric company;
  - a. Entry into the permanent program queue requires site control, interconnection studies and a signed cost letter to the utility, and local or state permitting applications.
  - b. July 1<sup>st</sup>, 2027 is a reasonable deadline for projects under development to hit this mature bar for project development. Furthermore, this aligns to when the PSC should already have had a tariff in place to guide future development.
5. Create a **community solar fund within the Office of Home Energy Programs** for low- and moderate-income households.
  - a. This is key to ensuring that the benefits of community solar are delivered to Maryland's most vulnerable households in the face of skyrocketing electricity rates.
  - b. The proposed program would ensure dollars otherwise being spent on customer outreach are delivered directly to the Office of Home Energy Programs for direct bill assistance.

Thank you for your consideration. I look forward to working with you and Members of the Committee on this and other energy legislation.

Thank you,

/s/

David Murray

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