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Dear Chair Feldman,

We appreciate the opportunity to provide testimony on Senate Bill 386. We commend the Governor's leadership and strongly support the intent of the legislation and the establishment of a Solar and Energy Storage Market Stabilization Program. Maryland's clean energy industry is navigating significant market uncertainty, and a financial support program could help maintain project pipelines, preserve jobs, and ensure continued progress toward the State's renewable energy goals.

We are supportive of the concept of providing financial assistance in the form of low-interest and zero-interest loans or grants. Access to affordable capital is essential to keeping projects viable during periods of elevated interest rates, supply chain volatility, and federal policy uncertainty.

Founded in 2012, Solar Landscape is a vertically integrated solar developer and national leader in community solar deployment. We focus on developing community solar projects on commercial and industrial rooftops using a roof-lease model in which we lease the rooftops of large warehouse and storage facilities to host solar installations that deliver power back to the grid through community solar in Maryland.

Maryland is a central part of our portfolio, and our work aligns directly with the state's clean energy and equity priorities. Currently our portfolio consists of 82 projects, 45 of which have energized and are already delivering clean energy to Marylanders. The other 37 projects are currently under development. All our current projects have been awarded funding under the Maryland Energy Administration's Community Solar LMI PPA Grant and are committed to providing at least 51% of energy produced to either low-income or low-to-moderate-income households. Solar Landscape is ranked the #1 Maryland Commercial Solar Contractor, reflecting our sustained investment in the state's community solar program.[1] We remain committed to helping Maryland meet its renewable energy targets and advance energy equity.

We respectfully urge the Committee to consider several amendments to ensure the program achieves its intended outcomes.

1. Reconsideration of the Funding Source

While we strongly support the concept of dedicated funding for solar and storage deployment, we are concerned about the proposed funding mechanism. As drafted, the program would rely

[1] Solar Power World, 2025

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on the Maryland Strategic Energy Investment Fund (SEIF), as well as any other money made available to the administration for the program. SEIF currently supports over 30 different programs/initiatives across the state aimed at reducing energy bills, increasing energy access and equity, attracting businesses, creating jobs, and promoting energy independence.

It is critical that establishing a new Solar and Energy Storage Market Stabilization Program does not unintentionally diver resources or undermine these existing efforts. We therefore encourage the Committee to explore alternative, durable funding structures that will support this new initiative without creating instability elsewhere in the State's energy framework.

2. Clarifying the Target Market Need

The bill appears aimed at addressing financing challenges facing "shovel-ready" projects. However, projects that are truly shovel-ready are often among the least risky from a financing perspective. In the current federal policy environment, these projects are also typically the safest candidates to still be able to qualify for the federal Investment Tax Credit (ITC), which makes them more attractive to investors and lenders.

As a result, shovel-ready projects may not be the segment of the market most in need of stabilization assistance. We encourage amendments to more precisely target projects that are experiencing genuine capital access barriers — such as early-stage developments, projects located in underserved communities, or projects with higher upfront development costs that deliver substantial public benefits.

3. Avoiding Unintended Site Selection Bias

If the program selection prioritizes "lowest cost" projects without further qualification, it may inadvertently select only ground-mounted projects located on greenfields or agricultural land. These sites are often less expensive to develop compared to other locations like solar projects located on commercial and industrial rooftops, brownfields, rooftops, parking canopies, or other segments that site solar on otherwise unproductive space. Ground-mounted systems typically benefit from greater economies of scale and lower land lease costs, which can give them a structural cost advantage.

However, commercial and industrial rooftop solar provides unique and irreplaceable value to Maryland's electric grid. These projects interconnect at the distribution level, meaning they avoid the PJM transmission queue and the multi-year delays associated with it. They face no zoning or siting opposition because they are built on existing infrastructure, are typically invisible from street-level, and located where electricity demand already exists. Unlike any other

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form of generation available to Maryland, these projects can be developed and constructed in 12 to 24 months.

Due to this speed, the Brattle Group found that one gigawatt of commercial and industrial rooftop solar deployed over the next five years would save Maryland ratepayers approximately $300 million, in addition to the guaranteed bill savings provided directly to subscribers. By coming online quickly, these projects help meet rising demand, reduce reliance on costly out-of-state power, and avoid more expensive transmission and capacity investments.

Without additional siting criteria or scoring preferences, the program could inadvertently disadvantage these high-value projects in favor of lower-cost greenfield systems. To ensure alignment with State policy goals, we urge the Committee to amend the bill to:

- Prioritize projects located on commercial and industrial rooftops; and
- Recognize the higher development costs associated with rooftop sites and ensure they are not disadvantaged in funding allocation.

Framing the program to support strategic types of assets, rather than simply the lowest-cost assets, will better align the legislation with Maryland's land use, equity, and grid modernization objectives.

Conclusion

We commend the Governor for advancing a proactive approach to stabilizing Maryland's solar and energy storage markets during a period of uncertainty. With targeted amendments Senate Bill 386 can serve as an effective tool to preserve momentum in Maryland's clean energy transition.

We respectfully request a favorable report with amendments.

Thank you for your consideration.