



MARYLAND GENERAL ASSEMBLY
Senate Education, Energy, and the Environment Committee
HB 1532 – Utility RELIEF (Reducing Energy Load Inflation for Everyday Families) Act
March 25, 2026

Chair Feldman, Vice Chair Kagan, and Members of the Committee:

On behalf of Nexamp, one of the nation’s leading distributed solar and energy storage providers, thank you for the opportunity to comment on HB 1532. Our comments focus on the bill’s provisions dealing with net energy metering and potential successor program. We support the bill’s direction and respectfully request a favorable report with amendments that provide greater clarity and continuity for existing and in-development projects and strengthen the statutory guidance to the Public Service Commission (PSC) as it designs the successor program.

Nexamp is a developer, owner and operator of community solar projects in Maryland, has been an active participant in the Community Solar Pilot Program since 2017, and we are proud to have built the Program’s first LMI project, located in Queen Anne’s County, serving 51% low-and moderate-income customers. We now have 9 operating projects across the state, representing 22 MW of clean generation, which provide energy savings to more than 2500 customers statewide, including 1000 LMI customers. In addition to our operating portfolio, we have many projects that are actively in construction and in development here in MD that are planned for participation in net metering and community solar.

We strongly encourage the Committee to adopt the essential amendments provided by the Joint Solar Trades, with a few important points outlined below:

1. Clarify transition rules to protect existing and pipeline projects

We strongly support HB 1532’s goal of moving Maryland to a modern, value-aligned successor to net metering. To be workable in practice, however, the bill should more clearly address how current and in-development projects qualify for and remain under NEM 1.0 as the State transitions.

We support the Joint Solar Trades’ essential amendments to provide community solar eligibility by requiring that CSEGS projects:

- Enter the community solar queue under § 7-306.2 by July 1, 2027, and
- Have paid the initial interconnection deposit to the utility;
- Then achieve commercial operation under the PSC’s existing 36-month COMAR deadlines, with PSC authority to extend for good cause.

This strikes the right balance: a clear standard that demonstrates substantial financial commitment—rather than an impractical requirement to pay all interconnection costs up front. Importantly, this will also provide the assurance that projects can move forward, which is especially critical and time-sensitive given the closing window for claiming the federal investment tax credit.

2. Provide a workable cap for addressing utility concerns

In seeking to prevent over-concentration of projects in each utility service territory, HB 1532 should take into greater consideration the current development of projects, which has been based on the current statewide allocation of the 3,000 MW net metering cap, and structure those limits to be prospective only.

We support the amendment that for Delmarva Power and Potomac Edison only, sets a community solar limit at 150% of each utility’s existing CSEGS queue as of April 1, 2026. This forward-looking approach avoids retroactively subdividing a statewide cap that was never designed to be utility-specific and that developers have relied upon in making long-term investments. It also prevent an immediate “cliff” that would strand late-stage development projects, while still putting a reasonable growth limit in smaller service areas.

3. Strengthen statutory guidance for the successor compensation framework

We appreciate that HB 1532 directs the PSC to develop and implement a successor program. As with HB 1476, Nexamp’s view is that clear statutory direction is essential so that the resulting tariffs are both investable and durable. We support the successor program value-components amendment that would:

- Establish a value for successor-program that at a minimum credits projects based on a generation value and transmission value; and
- Direct the PSC to study and then incorporate the additional value that distributed solar provides to the distribution grid and overall energy system (e.g., avoided capacity costs, reduced line losses, reliability and resilience benefits) and incentivizes the addition of energy storage.

4. Ensure consistent treatment of operational projects

Finally, HB 1532 should make clear that there will be no changes to the treatment of operational projects or those under construction. These projects have been built and financed under the current net metering framework with an expectation that that framework will stay in place for the life of the project.

Any retroactive changes to that treatment would cause significant damage, not only to those projects and their customers, but to all future projects looking to participate in net metering or its successor.

These projects require significant upfront financial investments that are paid back over time as the projects come online. Retroactive changes to project compensation create a huge risk for financiers that, at minimum, will increase the cost of doing business in Maryland or could lead to many seeing the market as too risky. HB 1532 should avoid going down this path.

HB 1532 is an important and necessary step in modernizing Maryland's net metering framework. With the targeted amendments outlined above the bill can provide the clarity and continuity required to:

- Keep existing and pipeline projects moving during a narrowing ITC window;
- Avoid market freezes or stranded investments; and
- Support a thoughtful, durable evolution toward a more value-aligned compensation structure.

For these reasons, Nexamp respectfully urges a favorable report on HB 1532 with amendments.

Thank you for your consideration.

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