



Maryland Energy Administration

TO: Chair Ferguson, Vice Chair Kagan, and Members of the Education, Energy, and Environment Committee

FROM: MEA

SUBJECT: SB 992 - Public Utilities - Large Load Customers - Registration and Demand Response Program

DATE: March 12, 2026

MEA Position: FAVORABLE WITH AMENDMENTS

The Maryland Energy Administration (MEA) respectfully submits this letter of support with amendments for Senate Bill 992, which establishes a framework for managing large load customers and ensuring that new large-scale electricity demand is integrated responsibly into Maryland’s electric grid.

As Maryland continues to see increased interest from energy-intensive facilities such as data centers, it is critical that the State implement policies that promote grid reliability, cost protection for ratepayers, and responsible planning for large new loads. SB 992 represents an important step toward ensuring that the Public Service Commission has appropriate oversight and the tools to manage these emerging grid impacts.

While MEA supports the overall intent of the legislation, we respectfully offer several technical and clarifying amendments to ensure the bill aligns with existing regulatory frameworks and improves implementation.

Amendment No. 1

Alter the Definition of “Large Load Customer” to be 50 MW: The bill lowers the threshold for a large load customer from an aggregate monthly demand of 100 MW to 25 MW. MEA advises against reducing the threshold to 25 MW, which will potentially capture non-data center commercial and industrial customers. Maintaining a higher threshold, such as 50 MW, would preserve clarity of the intent of the bill that the State is excluding more traditional businesses from this special rate class. This recommendation has also been proposed by PJM.¹

Amendment No. 2

¹ PJM considers loads equal to or in excess of 50 MW to be “large load additions”. See www.pjm.com/-/media/DotCom/committees-groups/subcommittees/las/postings/load-adjustment-request-implementation.pdf at 5, and www.pjm.com/-/media/DotCom/about-pjm/who-we-are/public-disclosures/2026/20260116-pjm-board-letter-re-results-of-the-cifp-process-large-load-additions.pdf at 2.

Amend the title of the bill to replace “**REGISTRATION**” with “**INTERCONNECTION**”.

Amendment No. 3

MEA recommends eliminating the registry in favor of information submitted to the PSC. Large load customers should be required to submit relevant planning information to the PSC, with the information maintained under strict confidentiality protections. Accurate load forecasting and transmission planning are the primary concerns, and this change can support those initiatives.

Amendment No. 4

MEA recommends eliminating the tax credit conditionality in favor of an expedited CPCN process for generation that is brought with large loads. This approach better aligns infrastructure development with load growth and allows generation resources to be developed alongside new demand.

Amendment No. 5

MEA recommends adding a grandfather provision to ensure that projects which have already made substantial progress through the development process are not negatively impacted by the new requirements. Without such a provision, projects that have already invested significant time and capital in Maryland may face regulatory uncertainty.

Amendment No. 6

MEA recommends modifying the curtailment provision in 7-321(f) to ensure that large load customers shed *before* other customers during system emergencies to maintain reliability.

Amendment No. 7

On page 5, in lines 20 and line 24, in each instance, strike “**ENERGY**”.

Amendment No. 8

On page 5, in line 23, strike “**ORDER**” and substitute “**ACTION**”.

These amendments provide greater clarity regarding the circumstances under which curtailment authority may be exercised and ensure that reliability actions occur during clearly defined system events.

Maryland’s electric system is entering a period of significant change as large energy-intensive facilities seek to interconnect to the grid. Establishing a thoughtful framework for integrating these loads is essential to protect residential ratepayers, maintain grid reliability, and ensure that new economic development aligns with Maryland’s clean energy goals.

MEA urges the committee to adopt the proposed amendments and to issue a **favorable report with amendments**.

Our sincere thanks for your consideration of this testimony. For questions or additional information, please contact Megan Outten, Policy manager, at megan.outten@maryland.gov or 443.842.1780.