



March 5, 2026

Education, Energy, and the Environment Committee

Large Load Customers – Electric System Interconnection and Demand Response Program

Senate Bill 596

Sponsor: Senator Katie Fry Hester

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CPower Energy Management

FAVORABLE WITH AMENDMENTS

Dear Chair Feldman, Vice Chair Kagan, and esteemed members of the Committee:

Based in Baltimore, CPower is the largest distributed energy resource aggregator in the United States. CPower engages with commercial, institutional, and industrial customers throughout Maryland and elsewhere to participate in various demand flexibility strategies, including wholesale (PJM) and utility-administered demand response programs. CPower recommends a favorable report of the EEE Committee on SB0596, with Amendments.

This legislation establishes interconnection procedures and requirements for new large load customers and a new demand response program.

1. The legislation should specify that large load customers may meet the requirement to provide 25% of capacity with demand response may do so through participation in either the existing demand response programs offered through PJM Interconnection or the new program envisioned under the legislation, at the customer's option.
2. SB596 should be amended to be less prescriptive in terms of its design elements. While it is appropriate to direct that the program should have limits to prevent excessive or overuse, the legislation should allow the PSC to design appropriate criteria for dispatch, lead times, duration, etc. according to reliability needs.
3. Instead of a "calendar year" basis, the Demand Response program should operate on the PJM electric delivery year basis that runs from June 1 – May 31.

Thank you for your consideration of these comments.

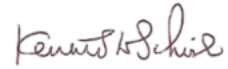
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Sincerely,



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