



Maryland Energy Administration

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

FROM: MEA

SUBJECT: SB 584 - Certificates of Public Convenience and Necessity and Transmission Lines - Notice to Landowners

DATE: February 26, 2026

MEA Position: LETTER OF INFORMATION

The Maryland Energy Administration (MEA) respectfully submits this Letter of Information on Senate Bill 584.

Maryland already maintains a structured process for reviewing applications for Certificates of Public Convenience and Necessity (CPCN) for transmission lines. The Public Service Commission (PSC) oversees a comprehensive review that includes formal notice requirements, opportunities for intervention, public comment periods, public hearings in affected jurisdictions, and coordination with State and local agencies. Under current law and PSC regulations, applicants must provide notice to affected property owners, local governments, and other stakeholders.

SB 584 would expand notice requirements by mandating certified mail notice at the time of application to additional categories of landowners and would establish that failure to provide such notice invalidates a public hearing and, in certain circumstances, voids the application entirely.

While meaningful landowner engagement remains an important component of transmission development, the procedural structure established in SB 584 carries operational implications for State agencies that warrant consideration. The bill would require certified mail notice to expanded categories of landowners at the time of application and would mandate automatic invalidation of hearings or voiding of applications if notice requirements are not met.

Although applicants would issue the notices, the PSC would be responsible for verifying compliance, resolving disputes regarding sufficiency of notice, and administering the statutory consequences associated with any deficiency. This would require additional review, documentation tracking, and procedural oversight at the outset of each CPCN filing.

The CPCN process is already resource-intensive. Commission staff coordinate multi-agency environmental and engineering reviews, manage evidentiary proceedings, schedule and conduct public hearings, and maintain complex dockets. Adding mandatory certified mail requirements tied to

automatic nullification provisions would increase administrative monitoring responsibilities and could require staff to revisit filings, rehear matters, or process reapplications.

In practice, even minor issues such as returned certified mail, discrepancies in tax assessment records, or clerical errors could trigger rehearings or void applications. Each of these outcomes would require additional staff time, scheduling resources, and legal review. This workload would fall on State agencies that are already managing a growing volume of transmission, grid modernization, and clean energy infrastructure proceedings.

As Maryland continues to advance reliability and clean energy initiatives, agency capacity remains a key operational consideration. The Committee may wish to evaluate the cumulative bandwidth implications of adding automatic procedural triggers that could necessitate duplicative proceedings and extended review timelines.

MEA offers this information to assist the Committee in understanding the administrative and resource impacts SB 584 may have on State agencies responsible for implementing the CPCN framework.

MEA remains committed to advancing affordability, reliability, and innovation while protecting ratepayers. Our sincere thanks for your consideration of this testimony. For questions or additional information, please contact Megan Outten at megan.outten@maryland.gov or 443.842.1780.