SB843 Favorable Written Testimony_New Energy Equit

Uploaded by: Brandon Henke-Fiedler

Position: FAV

12 March 2026

Senator Brian Feldman, Chair
Education, Energy, and the Environment Committee
2 West, Miller Senate Office Building
Annapolis, Maryland 21401

Written Testimony
SB843: Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)

Position: Favorable

Chair Feldman, Vice Chair Kagan, and members of the Education, Energy and the Environment Committee, thank you for the opportunity to provide favorable testimony on SB 843, Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act).

My name is Jamie Borell, Senior Vice President of Policy at New Energy Equity. We develop, build, own, and operate solar projects across the US. Headquartered in Annapolis with a significant presence in the state, Maryland is a special place for our business and employees who live here.

I am writing to provide favorable testimony on SB843, Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act).

By doubling down on its commitment to local power, Maryland would recognize that distributed generation is essential to the State's future. As regional electricity demand increases, Maryland has few tools in its toolbox to mitigate rapidly rising costs. These assets are uniquely valuable due to their small footprint and rapid ability to deploy. In aggregate, they help to mitigate capacity price increases and keep money in the pockets of Maryland ratepayers.

The SUNRISE Act recognizes that distributed solar helps to reduce homeowners' and businesses' bills while also bringing down grid costs. It sets up a transparent and predictable path to modernize the state's net metering program. And, it establishes a new relationship between community solar projects and the Office of Home Energy Programs (OHEP) in order to create a direct path of savings to low-and-moderate income households.

Maryland residents are facing extraordinary utility bill prices because of three main reasons:

1. We are primarily dependent on a natural gas heavy market
2. The infrastructure is old, and needs significant upkeep and capital investment

3. The PJM market is seeing historic prices due to projected capacity challenges as the region faces rising electricity demand, which is due to historic projected load growth

Clean, distributed generation helps to mitigate all of these costs, period. These projects are primarily financed using private capital, and their role as grid assets bring unique benefits to the distribution grid that lowers consumer energy costs by lowering utility costs. It is in Maryland's best interests to double down on distributed generation because that local generation is created when Marylanders demand the most electricity (during the day). That is when capacity needs are greatest, and when demand peaks.

Service Territory	Capacity Deployed (MW)	Annual Impact	Estimated Capacity Value (current capped price)	NET RATEPAYER SAVINGS
BGE	524.2	$8,918,119	$73,388,000	$64,469,881
Pepco	315.7	$4,526,955	$44,198,000	$39,671,045
DPL	119.1	$2,673,104	$16,674,000	$14,000,896
PE	127.1	$1,314,842	$17,794,000	$16,479,158

Above is a snapshot of distributed solar currently operating in Maryland in each investor-owned utility territory. The net ratepayer savings is a component of the bill impacts net metering has for each utility, and the capacity value of that solar based on the last PJM auction. **Without this operating solar, Maryland utilities would have needed to procure an additional $152 million in capacity in addition to the record capacity auction results that are causing electric bills to increase.**

It is essential to maximize how much distributed generation comes online. Hundreds of megawatts of capacity are currently under development within the current net metering program. Changes to existing rules could pull the rug out from this in-development capacity. It is important that any changes to the net metering program, and the creation of a successor program, protects such investments in the state. This legislation ensures that by creating clear steps and criteria that project developers can meet through actions that are largely under their control.

In addition, the community solar program at OHEP would unlock direct solar benefits for low-income households. The energy affordability crisis has disproportionally hurt those families who are eligible for energy assistance, Medicaid, food stamps and other public support programs. There are not enough dollars available to help everyone, however this program would allow community solar to augment the resources OHEP already has in place. This also enhances the ability of distributed solar to serve low-income households and communities.

Maryland can utilize distributed solar as a central tool to lowering consumer and utility energy costs with SB843. We look forward to working with this Committee to ensure Maryland remains a national leader in local, reliable, and equitable power.

New Energy Equity asks the committee for a favorable report on SB843.

Sincerely,
Jamie Borell,
Sr. VP, Policy

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SB843_Feldman_FAV.pdf
Uploaded by: David Murray
Position: FAV

March 10, 2025

Honorable Brian Feldman, Chair
Senate Education, Energy & Environment Committee
Senate Office Building
Annapolis, Maryland 21401

SB 843 – FAVORABLE

Dear Chair Feldman, Vice Chair Kagan and Senate Education, Energy & Environment Committee,

TurningPoint Energy ("TPE") is a solar and battery storage development and investment company, with over 1 gigawatt of community solar developed across the United States and 21 megawatts in Maryland alone. We were proud to participate in Maryland's community solar pilot program since its inception in 2015 and continue to invest heavily in the state's clean energy future.

Chair Feldman has been a longtime leader in the clean energy policy since serving as a Delegate; the SUNRISE Act is another example of his forward-thinking approach to ensuring Maryland continues to grow in-state clean energy resources.

There are two critical goals achieved by this bill, outlined below:

A Clear Direction for the Future of Solar & Energy Storage

The development cycle is long: a kitchen table conversation with a prospective landowner to delivering the first electrons to neighbors takes at least three to five years. Without a clear line of sight on how a community solar project will be compensated for providing power to customers, we cannot begin project development.

SUNRISE tackles this issue head-on by implementing a fair process by which solar projects in development are placed on the current community solar tariff. A project must have invested in site control, interconnection, and started securing local or state permits in order to hold a place in a future net energy metering queue. This method balances the need to provide certainty to project developers without offering positions to earlier stage, more speculative projects.

In tandem, the bill kicks off a process at the Public Service Commission (PSC) to create a successor tariff to net energy metering, to be implemented after the state has hit the 3,000 MW goal set by the General Assembly in 2021. The timeline recommended by SUNRISE provides sufficient time to truly analyze the complex dynamics of distributed energy deployment and the variety of benefits these resources provide to Marylanders.

By establishing a clear, fair process for current projects – and starting the process to build the structure for future ones – the SUNRISE Act ensures Maryland does not lose a step on meeting its clean energy deployment goals.

Additional Tools to Reach Low to Moderate Income (LMI) Households

The SUNRISE Act offers two new tools to leverage community solar projects to offset rising energy bills.

(1) **Section (O): Coordinating Community Solar Enrollment with the Office of Home Energy Programs (OHEP)** When the General Assembly made the community solar program permanent in 2023, every new project was required to deliver 40% of its power to low to moderate income households, offering each subscriber to less than a 10% discount on their energy bills. This requirement ensures that all projects not only deliver clean, local energy – but bill savings to Maryland's most vulnerable households.

At the same time, there have been challenges connecting LMI – particularly low-income – households with community solar savings. Many prospective households express skepticism or reluctance to signing up for a subscription, even though by statute they must receive at least 10% bill savings each month.

That is why SUNRISE coordinates community solar projects with local home energy offices. Section (P) ensures that agency staff can enroll households into community solar projects with a simple affirmative from the customer. Customers enrolling in community solar this method will need to save at least 20% on their energy bill. Once a customer has been enrolled by a subscription coordinator via OHEP or a local office, the coordinator remits $100 to OHEP as a "thank you" for staff time.

(2) Section (P): Direct Payments to OHEP

At present, community solar project owners are spending resources to knock on doors or run digital advertisements to attract prospective low to moderate income customers to sign up for guaranteed bill savings. This piecemeal process invites the question: why not deliver resources meant for LMI customer acquisition directly to LMI customers?

Section (P) of SUNRISE assumes that if a community solar project dedicates 4% (40% of its customers at a 10% retail discount) of its energy output for free to LMI customers, the project could double that amount – to 8% - and deliver a monetary payment to the Office of Home Energy Programs or Strategic Energy Investment Fund (SEIF) for direct energy assistance programs. The project will still subscribe customers – some of whom may benefit through Option (O) as well – but it will meet its requirement to deliver value to low-to-moderate income customers.

Thank you for your consideration. I look forward to working with you and Members of the Committee on this and other energy legislation.

Thank you,
/s/
David Murray
dmurray[at]tpoint-e.com

Solar Trades testimony EEE SB843 20260312 FINAL.pd
Uploaded by: Georgina Arreola-Lennox
Position: FAV

12 March 2026

Senator Brian Feldman, Chair
Education, Energy, and the Environment Committee
2 West, Miller Senate Office Building
Annapolis, Maryland 21401

Oral and Written Testimony
SB843: Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)
Position: Favorable

Chair Feldman and Members of the Senate Education, Energy, and the Environment Committee,

The Coalition for Community Solar Access (CCSA), the Chesapeake Solar and Storage Association (CHESSA), the Solar Energy Industries Association (SEIA), and the Maryland Rooftop Solar Coalition (MRSC) respectfully submit this joint **Favorable** testimony in support of Senate Bill 843.

CCSA is a national, business-led trade organization, composed of over 100 member companies, that works to expand access to clean, local, affordable energy nationwide through the development of robust community solar programs. Community solar projects involve medium-scale solar facilities that are shared by multiple community subscribers who receive credit on their electricity bills for their share of the power produced.

CHESSA is a regional trade association representing solar installers, developers, manufacturers, and other solar workers in Maryland, Virginia, and the District of Columbia. CHESSA's mission is to create a business and policy environment that encourages mainstream solar and energy storage adoption for the benefit of consumers, communities, and the electric grid. CHESSA is a recognized state affiliate of SEIA.

SEIA is the national trade association for the United States solar and energy storage industries. As the voice of the industry, SEIA works to support solar and energy storage as they become a mainstream and significant energy source by expanding markets, reducing costs, increasing reliability, removing market barriers, and providing education on the benefits of solar energy and energy storage. SEIA collaborates with its 1,200 member companies and other strategic partners to advocate for policies that create jobs and shape fair market rules that promote competition and the growth of reliable, low-cost solar power and energy storage.

MRSC is a coalition of national, regional, and local companies committed to growing Maryland's rooftop solar market. Our members create durable, family-supporting jobs and help Marylanders reduce and better manage their electricity bills through home solar and storage systems. MRSC

members have served Marylanders for well over a decade and hope to continue doing so for decades to come.

Our organizations represent the majority of distributed-generation companies operating in Maryland, including local installers, national developers, manufacturers, community solar providers, and residential contractors for whom the Maryland net metering program represents a necessary ingredient for them to operate in Maryland. These businesses account for hundreds of millions of dollars in private investment across the State. Solar energy, both customer-sited and community-based, is one of the most deployable and scalable energy resources available in Maryland today. It can be developed and interconnected quickly, attract private capital without long-term fuel risk, reduce peak demand, lower transmission congestion, and provide measurable system benefits to ratepayers. In the current environment of rising capacity costs and economic uncertainty, policies that provide clarity and stability for distributed generation are essential.

The SUNRISE Act acts proactively to:

1) Provide market stability through improved tracking and transparency as the State approaches the 3,000-megawatt (MW) net energy metering (NEM) cap;
2) Modernize Maryland net metering by directing the PSC to develop and implement a successor compensation program (SUNRISE) by July 1, 2027; and
3) Creates new, state-facilitated options for delivering community solar benefits to low-to moderate-income households to address related market challenges and affordability goals.

Over the past several months we've worked with our member companies and the sponsors to develop SB 843, or the SUNRISE Act. This legislation responds directly to Public Service Commission recommendations and growing industry concerns with the market uncertainty tied to the NEM cap, which is currently limited to 3,000 MW of operational capacity. The net metering program supports several different types of distributed solar: Residential, Commercial & Industrial, Municipal/Public, and Community Solar. These types of solar directly serve energy consumers, whether the solar projects are located at the same location as the consumer, or a different location.

While the State is only halfway to reaching that cap, with 1,537 MW of installed capacity as of June 30, 2025, the PSC highlights roughly 2,900 MW of additional community solar capacity that is not yet installed but is in various stages of development.[1] As a result, the PSC correctly finds that "this situation creates market uncertainty for projects already in development and may impede the progress of a key component of Maryland's renewable energy strategy," and recommends the General Assembly authorize the PSC to convene a formal proceeding to "create long-term program stability and protect ratepayer interests".

[1] Public Service Commission. Net Energy Metering in the State of Maryland. November 2025. Found here: https://www.pscmaryland.com/wp-content/uploads/2025/12/2025-Net-Metering-Report-4.pdf

The path laid out in the SUNRISE Act is meant to create an orderly closure and transition from the current net metering program to a successor program designed to support those different types of distributed solar serving their different consumer types in the most beneficial way possible. Those benefits can then be leveraged to bring down overall grid costs through lower PJM capacity demands, lower peak demand, and increased overall Maryland energy generation. It also cements a glide path within state policy for distributed solar amidst the chaotic tempest occurring with federal energy policy.

The creation of a community solar OHEP program is specifically designed to make solar benefits more directly available to low-income households who cannot otherwise access direct solar benefits. It is designed to augment and enhance the resources that OHEP already provides at a time when energy affordability is an increasing risk for these overburdened communities. This program would address persistent barriers to enrollment and strengthen the equity outcomes of Maryland's community solar program.

We appreciate Senator Feldman and the Committee for taking up this important issue and we look forward to continuing to work together in the coming weeks to establish a legislative direction that will maintain market momentum while evolving Maryland's distributed generation program to a more value-based structure.

While we support SUNRISE, there are refinements and technical corrections needed to address errors and updates relative to the version introduced. However, with SUNRISE as well as with SB966, we intend to continue discussions with key stakeholders and will provide the Committee amendments for consideration in the coming days as we strive for consensus among the parties.

Respectfully submitted,

/s/

Charlie Coggeshall
Mid-Atlantic Director
Coalition for Community Solar Access

/s/

Georgina Arreola-Lennox
Director, State Affairs, Mid-Atlantic
Solar Energy Industries Association

/s/
Robin Dutta
Executive Director
Chesapeake Solar & Storage Association

/s/
Katie Rever
Treasurer
Maryland Residential Solar Coalition

Ceres Testimony SB843 - SUNRISE Act.pdf
Uploaded by: Jeff Mauk
Position: FAV

SB 843 – SUPPORT
Jeff Mauk
Ceres
jmauk@ceres.org

TESTIMONY SUPPORTING SB 843
Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)

Senate Education, Energy, and the Environment Committee
March 12th, 2026

Dear Chair Feldman, Vice Chair Kagan, and members of the Education, Energy, and Environment Committee;

Ceres is a nonprofit organization working with the business and investor community to build a sustainable economy. Our network of companies, investors, and capital market influencers works to accelerate the adoption of sustainable business practices and cleaner energy markets. Through our Business for Innovative Climate and Energy Policy Network (BICEP), we assist over 80 major employers, including several companies doing business in MD, to advocate for more affordable and sustainable climate and clean energy policies. Ceres submits the following testimony in strong support of Senate Bill 843, the SUNRISE Act.

Investment Certainty Requires a Durable Successor to Net Energy Metering

Maryland's net energy metering (NEM) program has been a foundational market signal for distributed solar investment, enabling billions of dollars in private capital deployment across residential, commercial, and community-scale projects. As the state approaches its 3,000-megawatt statewide capacity limit, the absence of a clearly defined successor program creates material investment risk. Developers, lenders, and institutional investors cannot underwrite projects without confidence that compensation frameworks will remain viable post-cap.

SB843 directly addresses this market uncertainty by requiring the Public Service Commission to establish the SUNRISE Program, a value-of-solar compensation framework. The bill specifies that compensation must include, at minimum, baseline

Standard Offer Service rates plus avoided distribution costs, ancillary services, demand reduction price effects, reliability benefits, and emissions value. This multi-factor methodology aligns distributed energy compensation with actual grid value, providing a rational pricing framework that investors and project financiers can underwrite.
By establishing clear statutory timelines and substantive compensation floors, SB 843 preserves Maryland's position as a competitive market for distributed energy investment.

The Capacity Reservation System Protects Mature Capital Commitments

Among the most significant business-relevant provisions in SB 843 is the creation of a standardized statewide capacity reservation system for projects that have met material development milestones but are not yet operational. Under current law, projects that have executed interconnection agreements, paid deposits, secured site control, and obtained permitting approvals risk losing access to NEM compensation if the statewide cap fills before they reach operation.

This creates a structural problem for project finance: lenders and tax equity investors require certainty that compensation will be available at commercial operation. SB 843 resolves this by requiring electric companies to automatically accept capacity reservations for mature projects meeting defined interconnection milestones, and counting those reservations against the statewide cap on a first-come, first-served basis.

The bill further requires the Commission to establish uniform interconnection timelines, deposit standards, and a waitlist mechanism, eliminating the inconsistent utility-by-utility practices that currently generate regulatory delay and investor uncertainty.

This framework reduces the stranded investment risk that discourages project finance into Maryland's distributed generation sector, and ensures that capital committed under existing market rules is protected as the State transitions to the SUNRISE Program.

Transparent Capacity Tracking Enables Informed Investment Decisions

SB 843 requires the Commission to publish and maintain a statewide net energy metering capacity tracker beginning October 1, 2026, updated at least monthly. This tracker will identify total operational NEM capacity, remaining headroom before the statewide limit, and all capacity reservations and associated project deadlines. This disclosure infrastructure is directly responsive to a longstanding barrier to capital deployment:

developers and investors currently lack consistent, real-time visibility into remaining NEM availability, creating project pipeline risk.

Conclusion

SB 843 delivers what Maryland's distributed energy market most urgently needs: a credible, time-bound transition to a successor compensation program, a structured mechanism to protect mature capital investments, and administrative reforms that expand market access without increasing developer burden. These are foundational market design elements that determine whether private capital continues to flow into Maryland's clean energy economy. I urge the Committee to report SB 843 favorably.

Respectfully submitted,

Jeff Mauk
Director, State Policy, Eastern Region, Ceres

SB843_FAV_EconAction.pdf
Uploaded by: Jennifer Bevan-Dangel
Position: FAV

SB843: Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)

Position: Favorable

March 5, 2026

The Honorable Brian J. Feldman, Chair
Education, Energy and the Environment Committee
2 West Miller Senate Office Building
Annapolis, MD 21401
Cc: Members of the Committee

Chair Feldman and members of the Committee,

Economic Action Maryland Fund urges a favorable report on SB843, which would provide cost-savings for low- to moderate-income households by creating new pathways to connect to community solar energy projects.

As the members of this committee are painfully aware, energy rates have risen dramatically in recent years due to a variety of factors. Thousands of Marylanders each year face shutoff notices due to nonpayment, while many others are forced to juggle multi-hundred-dollar utility bills alongside the ever-increasing costs of rent, groceries, and other necessities. In fact, when Economic Action Maryland Fund surveyed our members and other stakeholders this winter, 63% stated utility bills were their primary concern.

According to industry analysis, participants in community solar programs save between 5% and 25% on their energy bills every month.[1] By connecting with existing solar generation, there are no up-front costs to the ratepayer, which is a significant benefit for low-income households that do not have the capital to invest in household solar. However, there remain significant barriers to connecting LMI ratepayers with these projects. These households are increasingly wary of energy scams, and are less likely to trust community solar staff engaged in outreach. And the process of registering for community solar can be difficult.

SB843 creates a streamlined process to proactively enroll LMI households in these programs, saving these families time and money. For these reasons, we urge a favorable report on SB843.

Sincerely,
Jennifer Bevan-Dangel, Deputy Director

[1] https://mdcommunitysolar.org/saving-money-with-maryland-community-solar-a-complete-guide/

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Marceline White · Marceline@EconAction.org | Jennifer Bevan-Dangel · Jennifer@EconAction.org

SB843 ECA Solar Testimony.pdf
Uploaded by: Kaitlin Kelly O'Neill
Position: FAV

ECA Solar
203 Crescent Street, Suite 106
Waltham, MA 02453

March 3, 2026

Senator Brian Feldman, Chair
Education, Energy, and the Environment Committee
2 West Miller Senate Office Building
Annapolis, MD 21401

Written Testimony
SB843: Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)

Position: Favorable

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

Thank you for the opportunity to provide testimony on SB843, the SUNRISE Act. Independently owned and operated for over 11 years, ECA Solar develops community solar projects that provide significant benefits to the local economy, community, and environment.
ECA Solar submits this testimony as Favorable for SB843.

The SUNRISE Act Provides an Orderly Transition to a Successor Net Metering Program

Maryland's commitment to distributed energy resources like community solar has provided many direct benefits. Landowners receive steady leasing income for decades, municipalities receive tax benefits, all ratepayers benefit from the improvements to the local distribution network that developers fund, and of course community solar customers are receiving direct savings on their utility bills. Maryland's increase to the net metering cap to 3GW combined with making the community solar pilot program a permanent program has created business certainty for projects to be financed and built. That certainty has been a bedrock for ensuring successful project development in a time of turbulent federal changes.

In considering a transition to a successor program, economic certainty for developers is key. The market has weathered the turbulence of the changes brought by the One Big Beautiful Bill, and maintaining consistency in state programs is critical to ensuring a resilient market. The SUNRISE Act provides an orderly transition to a successor net metering program, while also ensuring the valuation of the successor program is a robust cost benefit analysis of distributed generation.

The SUNRISE Act Increases Low and Moderate Income Customer Participation

The Community Solar Energy Generating Systems program includes a requirement that projects must serve eligible low and moderate income customers with 40% of the project's output. The SUNRISE Act contains language to help support this programmatic goal by enabling customers that are already receiving energy assistance through state programs to be enrolled in community solar projects. Utilizing programs that already provide energy assistance will help streamline the process for customers- allowing them to receive all of the energy assistance they are entitled to

ECA Solar
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without duplicative proofs of eligibility. The changes will help ease the energy burden for those who need it most urgently, while continuing to support the goal of extending the benefits of solar to all ratepayers.

ECA Solar supports the passage of SB843 and urges the Committee to issue a favorable report on this bill.

Thank you for your consideration and time.

Sincerely,

Kaitlin Kelly O'Neill
Director of Policy
ko@ecasolar.com

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Uploaded by: Kristen Harbeson
Position: FAV

MARYLAND LEAGUE OF CONSERVATION VOTERS

March 5, 2026

Support: SB843: Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)

Mr. Chair and Members of the Committee:

Maryland LCV Supports SB843: Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act) and we thank Senator Feldman for his leadership on this issue.

Maryland LCV is working to Power Maryland Forward, supporting **energy affordability** through **deployment of solar and storage, defense against more fossil fuels** and **unchecked utility profits**, while **getting the most out of the electricity grid we have**. SB843 supports these goals by offering one solution to support net metering and the state solar program beyond the existing net metering cap. This solution may be one considered by the Public Service Commission in an evaluation of potential successors to the net metering program as recommended by the Maryland Public Service Commission and mandated in other legislation being considered by this committee.

Maryland LCV's primary interest in SB843 is in its adjustment to the Community Solar program as relates to low-and-moderate income (LMI) market enhancements. Maryland LCV was one of the leading voices in passing the Community Solar permanent program, as an important vehicle to both advancing our clean energy goals and supporting LMI households in reducing their energy bills. The Maryland program mandates that all community solar projects reserve at least 40% of their energy for LMI subscribers, who receive a guaranteed discount off of their energy bills.

We understand that developers, acting in good faith, may have difficulty meeting their mandated threshold in some markets, and SB843 offers two new pathways to meet these requirements, working through the Office of Home Energy Programs (or local agencies) to serve LMI customers directly. Both of the proposed options ensure easier opportunities for LMI subscribers to benefit from the cost savings and clean energy, while overcoming the hurdles of trust, language barriers, among other impediments to success. We are supportive of an amendment to the bill to raise the dedicated low-income energy allocation from 8% to 10%, which is the recommendation of other advocates working in that space.

Maryland LCV urges a favorable report on these programmatic changes, as they are considering the future of Maryland's solar programs this legislative session.

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SB843 FAV _Ameresco.pdf
Uploaded by: Lisa Smith
Position: FAV

AMERESCO

Chair Brian J. Feldman
Senate Education, Energy, and the Environment Committee
RE: FAVORABLE – SB 843 – Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act) - SUNRISE Act

March 12, 2026

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

Thank you for the opportunity to provide written testimony in support of Senate Bill 843 - SUNRISE Act. Ameresco respectfully supports this legislation because it both preserves the stability of Maryland's community solar framework and expands meaningful access to clean energy savings for low- and moderate-income (LMI) households.

Ameresco is a leading developer of community solar projects in Maryland, with approximately 46 megawatts of projects operating or in development across the state. These projects serve Maryland residents, businesses, and public-sector customers while providing locally generated renewable energy that helps stabilize long-term electricity costs.

A central strength of the SUNRISE Act is its protection of access to the full statutory 3 GW net metering cap. For many years, this cap has served as a key pillar of Maryland's solar policy framework and has provided the certainty necessary for developers, investors, landowners, and local governments to move projects forward. Maintaining access to the full cap helps ensure that projects already in development can proceed under the policy assumptions that supported their investment decisions. Market stability is critical for continuing to attract private capital and ensuring that Maryland can deploy clean energy resources quickly and cost-effectively.

Equally important, however, are the provisions of SB 843 that expand and strengthen pathways for low- and moderate-income participation in community solar. Community solar has always held the promise of allowing households that cannot install rooftop solar—particularly renters and LMI households—to access the economic benefits of solar generation. The SUNRISE Act helps establish a more effective framework for connecting LMI residents with community solar subscriptions.

A key feature of the bill is leveraging the Office of Home Energy Programs (OHEP) as a trusted state entity with extensive experience administering programs that serve income-qualified households, including energy assistance and other benefit programs. Because OHEP already works directly with eligible residents and maintains established enrollment systems, it is uniquely positioned to help connect households with community solar savings.

This centralized approach significantly improves program efficiency by leveraging an existing state infrastructure that already interacts with the very households the program is intended to serve. It would unlock direct solar benefits for low-income households. There are not enough dollars available to help everyone, however this program would allow community solar to

augment the resources OHEP already has in place. This also enhances the ability of distributed solar to serve low-income households and communities. Rather than requiring solar developers to conduct large-scale outreach and enrollment campaigns, the program can rely on a trusted public agency that already has established relationships with eligible households.

The SUNRISE Act's structure helps ensure that more of the economic value created by community solar flows directly to participating households. In decentralized enrollment models, developers often must rely on extensive marketing and door-to-door outreach to recruit subscribers, which can increase program costs and create barriers to participation. By consolidating enrollment through OHEP, the program reduces administrative overhead and allows a greater share of the solar savings to reach the households that need them most.

Taken together, the SUNRISE Act represents a thoughtful evolution of Maryland's community solar policy. By preserving access to the full net metering cap while creating a more effective pathway for LMI participation, the legislation strengthens both the equity and durability of Maryland's clean energy programs.

Ameresco appreciates the Committee's continued leadership on energy policy and respectfully urges favorable consideration of SB 843. We look forward to working with the General Assembly, the Administration, and other stakeholders to continue expanding access to affordable clean energy for Maryland residents.

Thank you for the opportunity to provide this testimony.

Respectfully submitted,

Jonathan Mancini
Senior Vice President
Ameresco, Inc.

LSE Testimony - SB843.pdf
Uploaded by: Oliver Sandreuter
Position: FAV

Date: March 10, 2026

Senator Brian Feldman, Chair
Education, Energy, and the Environment Committee
2 West, Miller Senate Office Building
Annapolis, Maryland 21401

RE: SB843: Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)

Position: Favorable

Chair Feldman, Vice Chair Kagan, and members of the Education, Energy, and the Environment Committee, thank you for the opportunity to provide favorable testimony on SB 843, Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act).

Lodestar Energy LLC ("Lodestar") is an East Coast-focused renewable energy developer with its development office located in New York. Over our 10-year history, we have developed, owned, and operated over 40 solar projects, and we maintain an active pipeline of community solar projects in Maryland. We are committed to the continued success of renewable energy in the state and want to continue our investment in Maryland's economic development

By doubling down on its commitment to local power, Maryland would recognize that distributed generation is essential to the State's future. As regional electricity demand increases, Maryland has few tools in its toolbox to mitigate rapidly rising costs.

The SUNRISE Act recognizes that distributed solar helps to reduce homeowners' and businesses' bills while also bringing down grid costs. It sets up a transparent and predictable path to modernize the state's net metering program. And, it establishes a new relationship between community solar projects and the Office of Home Energy Programs (OHEP) in order to create a direct path of savings to low-and-moderate income households.

LODESTAR ENERGY

Maryland residents are facing extraordinary utility bill prices because of three main reasons:

1. We are primarily dependent on a natural gas heavy market
2. The infrastructure is old, and needs significant upkeep and capital investment
3. The PJM market is seeing historic prices due to projected capacity challenges as the region faces rising electricity demand, which is due to historic projected load growth

Clean, distributed generation helps to mitigate all of these costs. These projects are financed using private capital, and their role as grid assets bring unique benefits to the distribution grid that lowers consumer energy costs by lowering utility costs.

Service Territory	Capacity Deployed (MW)	Annual Impact	Estimated Capacity Value (current capped price)	NET RATEPAYER SAVINGS
BGE	524.2	$8,918,119	$73,388,000	$64,469,881
Pepco	315.7	$4,526,955	$44,198,000	$39,671,045
DPL	119.1	$2,673,104	$16,674,000	$14,000,896
PE	127.1	$1,314,842	$17,794,000	$16,479,158

Above is a snapshot of distributed solar currently operating in Maryland in each investor-owned utility territory. The net ratepayer savings is a component of the bill impacts net metering has for each utility, and the capacity value of that solar based on the last PJM auction. **Without this operating solar, Maryland utilities would have needed to procure an additional $152 million in capacity in addition to the record capacity auction results that are causing electric bills to increase.**

It is essential to maximize how much distributed generation comes online. Hundreds of megawatts of capacity are currently under development within the current net metering program. Changes to existing rules could pull the rug out from this in-development capacity ***and undermine investor confidence in future energy program buildouts in Maryland.***

LODESTAR ENERGY

In addition, coordinating the community solar program with OHEP would unlock direct solar benefits for low-income households. These families are often most impacted by the energy affordability crisis. Coordinating the two programs would expand the range of tools to address the problem in the near term, complementing Medicaid, food stamps, and other public assistance. This program would allow community solar to augment the resources OHEP already has in place and enhance the ability of distributed solar to serve low-income households and communities.

Maryland can utilize distributed solar as a central tool to lower consumer and utility energy costs with SB 843. We look forward to working with this Committee to ensure Maryland remains a national leader in local, reliable, and equitable power.

Lodestar asks the committee for a favorable report on SB 843.

Sincerely,

Oliver Sandreuter
Director of Business Development

Testimony in support of SB0843 - SUNRISE Act.pdf
Uploaded by: Richard KAP Kaplowitz
Position: FAV

SB0843_RichardKaplowitz_FAV
03/12/2026
Richard Keith Kaplowitz
Frederick, MD 21703

TESTIMONY ON SB#0843- POSITION: FAVORABLE

Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)

TO: Chair Feldman, Vice Chair Kagan and members of the Education, Energy and the Environment Committee
FROM: Richard Keith Kaplowitz

My name is Richard Keith Kaplowitz. I am a resident of District 3, Frederick County. I am submitting this testimony in support of SB#0843**, Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)**

The intent of this bill is to make solar energy generated electricity programs more available to low- and moderate-income households while increasing the statewide net energy to include the power from this program.

A statewide capacity reservation system for net energy metering (NEM) projects is a regulatory mechanism designed to manage the total amount of renewable energy capacity allowed on the grid under favorable NEM rates. It allows for the orderly development of solar and other distributed generation projects by enabling developers to "reserve" a portion of the state's total allowed NEM capacity, ensuring the project will be eligible for specific compensation rates even if the overall state cap is reached during the project's development. [1]

This bill will require the Office of Home Energy Programs to administer, or through a local administering agency administer, certain programs and activities regarding low- and moderate-income households and the Community Solar Energy Generating Systems Program; altering the method by which certain rated generating capacity is counted toward the statewide net energy metering limit; requiring the Public Service Commission to establish a certain statewide capacity reservation system for certain net energy metering projects; etc.

I respectfully urge this committee to return a favorable report on SB#0843.

[1] Google AI Search "what is a statewide capacity reservation system for net energy metering projects"

Solar Trades testimony EEE SB843 20260312 FINAL.pd
Uploaded by: Robin Dutta
Position: FAV

12 March 2026

Senator Brian Feldman, Chair
Education, Energy, and the Environment Committee
2 West, Miller Senate Office Building
Annapolis, Maryland 21401

Oral and Written Testimony
SB843: Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)
Position: Favorable

Chair Feldman and Members of the Senate Education, Energy, and the Environment Committee,

The Coalition for Community Solar Access (CCSA), the Chesapeake Solar and Storage Association (CHESSA), the Solar Energy Industries Association (SEIA), and the Maryland Rooftop Solar Coalition (MRSC) respectfully submit this joint **Favorable** testimony in support of Senate Bill 843.

CCSA is a national, business-led trade organization, composed of over 100 member companies, that works to expand access to clean, local, affordable energy nationwide through the development of robust community solar programs. Community solar projects involve medium-scale solar facilities that are shared by multiple community subscribers who receive credit on their electricity bills for their share of the power produced.

CHESSA is a regional trade association representing solar installers, developers, manufacturers, and other solar workers in Maryland, Virginia, and the District of Columbia. CHESSA's mission is to create a business and policy environment that encourages mainstream solar and energy storage adoption for the benefit of consumers, communities, and the electric grid. CHESSA is a recognized state affiliate of SEIA.

SEIA is the national trade association for the United States solar and energy storage industries. As the voice of the industry, SEIA works to support solar and energy storage as they become a mainstream and significant energy source by expanding markets, reducing costs, increasing reliability, removing market barriers, and providing education on the benefits of solar energy and energy storage. SEIA collaborates with its 1,200 member companies and other strategic partners to advocate for policies that create jobs and shape fair market rules that promote competition and the growth of reliable, low-cost solar power and energy storage.

MRSC is a coalition of national, regional, and local companies committed to growing Maryland's rooftop solar market. Our members create durable, family-supporting jobs and help Marylanders reduce and better manage their electricity bills through home solar and storage systems. MRSC

members have served Marylanders for well over a decade and hope to continue doing so for decades to come.

Our organizations represent the majority of distributed-generation companies operating in Maryland, including local installers, national developers, manufacturers, community solar providers, and residential contractors for whom the Maryland net metering program represents a necessary ingredient for them to operate in Maryland. These businesses account for hundreds of millions of dollars in private investment across the State. Solar energy, both customer-sited and community-based, is one of the most deployable and scalable energy resources available in Maryland today. It can be developed and interconnected quickly, attract private capital without long-term fuel risk, reduce peak demand, lower transmission congestion, and provide measurable system benefits to ratepayers. In the current environment of rising capacity costs and economic uncertainty, policies that provide clarity and stability for distributed generation are essential.

The SUNRISE Act acts proactively to:

1) Provide market stability through improved tracking and transparency as the State approaches the 3,000-megawatt (MW) net energy metering (NEM) cap;
2) Modernize Maryland net metering by directing the PSC to develop and implement a successor compensation program (SUNRISE) by July 1, 2027; and
3) Creates new, state-facilitated options for delivering community solar benefits to low-to moderate-income households to address related market challenges and affordability goals.

Over the past several months we've worked with our member companies and the sponsors to develop SB 843, or the SUNRISE Act. This legislation responds directly to Public Service Commission recommendations and growing industry concerns with the market uncertainty tied to the NEM cap, which is currently limited to 3,000 MW of operational capacity. The net metering program supports several different types of distributed solar: Residential, Commercial & Industrial, Municipal/Public, and Community Solar. These types of solar directly serve energy consumers, whether the solar projects are located at the same location as the consumer, or a different location.

While the State is only halfway to reaching that cap, with 1,537 MW of installed capacity as of June 30, 2025, the PSC highlights roughly 2,900 MW of additional community solar capacity that is not yet installed but is in various stages of development.[1] As a result, the PSC correctly finds that "this situation creates market uncertainty for projects already in development and may impede the progress of a key component of Maryland's renewable energy strategy," and recommends the General Assembly authorize the PSC to convene a formal proceeding to "create long-term program stability and protect ratepayer interests".

[1] Public Service Commission. Net Energy Metering in the State of Maryland. November 2025. Found here: https://www.pscmaryland.com/wp-content/uploads/2025/12/2025-Net-Metering-Report-4.pdf

The path laid out in the SUNRISE Act is meant to create an orderly closure and transition from the current net metering program to a successor program designed to support those different types of distributed solar serving their different consumer types in the most beneficial way possible. Those benefits can then be leveraged to bring down overall grid costs through lower PJM capacity demands, lower peak demand, and increased overall Maryland energy generation. It also cements a glide path within state policy for distributed solar amidst the chaotic tempest occurring with federal energy policy.

The creation of a community solar OHEP program is specifically designed to make solar benefits more directly available to low-income households who cannot otherwise access direct solar benefits. It is designed to augment and enhance the resources that OHEP already provides at a time when energy affordability is an increasing risk for these overburdened communities. This program would address persistent barriers to enrollment and strengthen the equity outcomes of Maryland's community solar program.

We appreciate Senator Feldman and the Committee for taking up this important issue and we look forward to continuing to work together in the coming weeks to establish a legislative direction that will maintain market momentum while evolving Maryland's distributed generation program to a more value-based structure.

While we support SUNRISE, there are refinements and technical corrections needed to address errors and updates relative to the version introduced. However, with SUNRISE as well as with SB966, we intend to continue discussions with key stakeholders and will provide the Committee amendments for consideration in the coming days as we strive for consensus among the parties.

Respectfully submitted,

/s/

Charlie Coggeshall
Mid-Atlantic Director
Coalition for Community Solar Access

/s/

Georgina Arreola-Lennox
Director, State Affairs, Mid-Atlantic
Solar Energy Industries Association

/s/
Robin Dutta
Executive Director
Chesapeake Solar & Storage Association

/s/
Katie Rever
Treasurer
Maryland Residential Solar Coalition

SUNRISE Act of 2026.pdf
Uploaded by: Robin Dutta
Position: FAV

COALITION FOR COMMUNITY SOLAR ACCESS

SEIA Solar Energy Industries Association®

CHESSA

SUNRISE Program Act of 2026

The SUNRISE (Standard Utility Net-Export Rate for Integrated Solar and Energy) Program Act of 2026:

- **Provides solar market stability** by improving tracking and transparency as the State fast approaches a 3-gigawatt (GW) statutory cap on net energy metering (NEM);
- **Modernizes Maryland's NEM framework** by directing the Public Service Commission (PSC) to develop and implement a successor compensation program (SUNRISE) by July 1, 2027, which is expected to make electricity more affordable for all ratepayers by compensating exported electricity based on the actual value of solar generation to the grid; and
- **Creates new, state-facilitated options for delivering community solar benefits to low- to moderate-income (LMI) households, lowering electric bills and providing ratepayer assistance,** and addressing persistent enrollment barriers and regional market constraints.

These changes respond directly to PSC recommendations and growing industry concern with the market uncertainty tied to the NEM cap and its successor, while strengthening equity outcomes and addressing electricity affordability in the community solar program.

Capacity Reservation System (Effective July 1, 2027)

Statutory Change. The Act requires the PSC to establish a standardized, statewide capacity reservation system for mature NEM projects as Maryland approaches the 3GW NEM cap:

- Eligibility is based on defined development milestones, tailored by project type.
- Utilities must automatically grant reservations once milestones are met.
- Reserved capacity counts toward the NEM cap.

Policy Rationale: Under current law, projects count towards the 3GW NEM cap when they become operational. As the cap nears, that approach becomes unworkable because projects can be under construction (or fully developed and financed) yet face the risk that the cap will be hit before energization. The proposed capacity reservation system addresses this risk by allowing mature projects to count towards the cap before they have started construction, all without increasing the cap beyond 3GW.

SUNRISE Program – Successor to Net Metering

Statutory Change. The Act directs the PSC to develop and adopt the SUNRISE Program by July 1, 2027 to compensate exported electricity based on actual grid value, including energy, capacity, transmission, and other PSC-approved values. If the NEM cap has not yet been reached, projects coming online after SUNRISE is available may choose between NEM and SUNRISE. It is expected that implementation of SUNRISE will reduce ratepayer impacts – lowering all ratepayers' electric bills – while striking the balance to ensure a robust community solar market in Maryland.

Policy Rationale: This establishes a clear, legislatively mandated transition beyond traditional net metering. NEM functioned as an intuitive proxy for solar's value by crediting exports at the full retail rate (effectively running the customer's electric meter backwards) at a time when more sophisticated valuation methods were not yet practical to implement. SUNRISE replaces that rule-of-thumb approach with compensation grounded in solar's measured value, as determined through a comprehensive public process.

Net Metering Cap Tracking

Statutory Change. The Act affirms the 3GW statewide NEM cap and revises how progress toward that cap is measured to both operational and reserved capacity held by mature, non-operational projects.

By October 1, 2026, the PSC must publish (or require utilities to publish) a monthly statewide NEM capacity tracker showing total operational capacity, remaining available capacity, and, beginning July 1, 2027, reserved capacity and queue order for qualified projects.

Policy Rationale: With a large share of the cap already subscribed and development expected to exceed remaining capacity, improved transparency is necessary for developers, utilities, and regulators to manage the transition to a successor compensation program and to reduce market disruption.

Community Solar and LMI Market Enhancements

Statutory Change. The Act creates two new pathways for projects to meet community solar LMI requirements, including lowering electric bills and providing ratepayer assistance:

1. OHEP-Facilitated Opt-Out Enrollment (Section p):
    - Enrollment coordinated by the Office of Home Energy Programs (or local agencies).
    - Guaranteed 20% electric utility bill savings making electricity more affordable.
    - No fees, no termination penalties, and no required subscriber contracts.
    - $50 acquisition fee paid by subscriber organizations to support administration.

2. Dedicated Low-Income Energy Allocation (Section q):
    - Projects may dedicate 8% of entire project output for free allocation to low-income households;
    - Credits allocated by OHEP or the Maryland Energy Administration to provide ratepayer energy assistance.

Policy Rationale: These two options address persistent challenges in reaching LMI households through third-party marketing and contracting alone (including trust, paperwork, language barriers, and screening). These state-facilitated pathways reduce those barriers while preserving consumer protections and ensuring guaranteed savings making electricity more affordable.

Stakeholder Benefits

- **PSC:** Gains clear legislative direction and authority over cap accounting, queue management, successor program design, and LMI administration oversight.
- **LMI Customers:** Benefit from guaranteed ratepayer savings, simplified enrollment, and delivery through trusted public agencies rather than market-only approaches.
- **Utilities:** Must comply with uniform reservation, tracking, and transparency requirements, reducing discretion while increasing predictability.

Effective Date: July 1, 2026 (with capacity reservations and SUNRISE effective July 1, 2027).

Additional Policy Background on NEM Program

Net Metering – Behind the Meter (BTM)

NEM credits customer-sited solar by netting on-site production against on-site consumption over the billing period. When a customer exports excess generation, it is credited at the full retail rate - effectively running the meter backwards.

- A bidirectional meter records energy flowing to and from the grid, and the customer's bill is based on net kWh for the period.
- Retail-rate credits from exports offset later consumption, making the customer's savings easy to see directly on the bill.
- Because it was intuitive and administratively simple, NEM served as a practical rule-of-thumb proxy for solar value before more granular value-of-solar methods (such as SUNRISE) were feasible to implement.

Net Metering – Community Solar (CS)

Maryland's Community Solar Energy Generating Systems (CSEGS) Program allows customers who cannot host rooftop solar to subscribe to a share of an off-site project and receive utility bill credits for that share's generation (virtual net metering).

- The CSEGS Program allows multiple electric utility customers to subscribe to the output of an off-site solar project (often called a "solar farm") and receive NEM credits on their utility bills, just as if the panels were on their own roof.
- The program began as a pilot in 2017 (authorized by a 2015 law) and, after several extensions, was made permanent in 2023 with the passage of House Bill 908.
- Each CSEGS must allocate at least 40% of its energy output to low- to moderate-income (LMI) subscribers at a minimum 10% discount.
- Because enrollment frequently depends on third-party marketing and contracts, LMI households can face barriers (trust, paperwork, language access, credit screening). The SUNRISE Program Act's state-facilitated pathways are designed to reduce those barriers while preserving consumer protections and guaranteed savings.

Net Metering Capacity – Status

- As of June 30, 2025, there was 1,537 MW – consisting of 1,320 MW (BTM) and 216 MW (CS)
  - BG&E – 564 MW (BTM); 119 MW (CS)
  - Pepco – 360 MW (BTM); 41 MW(CS)
  - Potomac Edison – 140 MW (BTM); 40 MW (CS)
  - Delmarva – 128 MW (BTM); 16 MW (CS)
  - Other - SMECO – 90 MW (BTM) ; Choptank – 34 MW (BTM) ; Other – 4 MW (BTM)
- PSC estimates there is 2,911 MW of community solar pending projects, including:
  - 700 MW awaiting PSC authorization
  - 1,728 MW in the utility interconnection queue
  - 483 MW accepted into program but not yet operating

[1] Public Service Commission. Net Energy Metering In the State of Maryland. November 2025.

SB843 Favorable Written Testimony_Soltage.pdf
Uploaded by: Sarah Smith
Position: FAV

12 March 2026

Senator Brian Feldman, Chair
Education, Energy, and the Environment Committee
2 West, Miller Senate Office Building
Annapolis, Maryland 21401

Written Testimony
SB843: Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)

Position: Favorable

Chair Feldman, Vice Chair Kagan, and members of the Education, Energy and the Environment Committee, thank you for the opportunity to provide favorable testimony on SB 843, Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act).

My name is Zac Meyer, and I am a Director of Development at Soltage. Soltage originates, develops, finances, owns, and operates solar energy facilities across the nation in 16 states and growing. We have been active in Maryland since 2021 with 3 operational facilities, 2 under construction, and a strong development pipeline of over 100 megawatts of solar in Maryland.

I am here to provide favorable testimony on SB843, Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act).

By doubling down on its commitment to local power, Maryland would recognize that distributed generation is essential to the State's future. As regional electricity demand increases, Maryland has few tools in its toolbox to mitigate rapidly rising costs. These assets are uniquely valuable due to their small footprint and rapid ability to deploy. In aggregate, they help to mitigate capacity price increases and keep money in the pockets of Maryland ratepayers.

The SUNRISE Act recognizes that distributed solar helps to reduce homeowners' and businesses' bills while also bringing down grid costs. It sets up a transparent and predictable path to modernize the state's net metering program. And, it establishes a new relationship between community solar projects and the Office of Home Energy Programs (OHEP) in order to create a direct path of savings to low-and-moderate income households.

Maryland residents are facing extraordinary utility bill prices because of three main reasons:

1. We are primarily dependent on a natural gas heavy market
2. The infrastructure is old, and needs significant upkeep and capital investment

3. The PJM market is seeing historic prices due to projected capacity challenges as the region faces rising electricity demand, which is due to historic projected load growth

Clean, distributed generation helps to mitigate all of these costs, period. These projects are primarily financed using private capital, and their role as grid assets bring unique benefits to the distribution grid that lowers consumer energy costs by lowering utility costs. It is in Maryland's best interests to double down on distributed generation because that local generation is created when Marylanders demand the most electricity (during the day). That is when capacity needs are greatest, and when demand peaks.

Service Territory	Capacity Deployed (MW)	Annual Impact	Estimated Capacity Value (current capped price)	NET RATEPAYER SAVINGS
BGE	524.2	$8,918,119	$73,388,000	$64,469,881
Pepco	315.7	$4,526,955	$44,198,000	$39,671,045
DPL	119.1	$2,673,104	$16,674,000	$14,000,896
PE	127.1	$1,314,842	$17,794,000	$16,479,158

Above is a snapshot of distributed solar currently operating in Maryland in each investor-owned utility territory. The net ratepayer savings is a component of the bill impacts net metering has for each utility, and the capacity value of that solar based on the last PJM auction. **Without this operating solar, Maryland utilities would have needed to procure an additional $152 million in capacity in addition to the record capacity auction results that are causing electric bills to increase.**

It is essential to maximize how much distributed generation comes online. Hundreds of megawatts of capacity are currently under development within the current net metering program. Changes to existing rules could pull the rug out from this in-development capacity. It is important that any changes to the net metering program, and the creation of a successor program, protects such investments in the state. This legislation ensures that by creating clear steps and criteria that project developers can meet through actions that are largely under their control.

In addition, the community solar program at OHEP would unlock direct solar benefits for low-income households. The energy affordability crisis has disproportionally hurt those families who are eligible for energy assistance, Medicaid, food stamps and other public support programs. There are not enough dollars available to help everyone, however this program would allow community solar to augment the resources OHEP already has in place. This also enhances the ability of distributed solar to serve low-income households and communities.

Maryland can utilize distributed solar as a central tool to lowering consumer and utility energy costs with SB843. We look forward to working with this Committee to ensure Maryland remains a national leader in local, reliable, and equitable power.

Soltage asks the committee for a favorable report on SB843.

Sincerely,

Zac Meyer
Director of Development
Soltage

CleanCapital Testimony_SB 843.pdf
Uploaded by: Scott Elias
Position: FAV

March 12, 2026

Senator Brian Feldman, Chair
Senate Education, Energy, and the Environment Committee
2 West Miller Senate Office Building
Annapolis, Maryland 21401

Written Testimony

SB 843: Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)

Position: Favorable

Chair Feldman, Vice Chair Kagan, and members of the Senate Education, Energy, and the Environment Committee,

Thank you for the opportunity to testify in strong support of the SUNRISE Act (SB 843). My name is Scott Elias, and I am the Director of Policy and Market Development at CleanCapital, a leading independent power producer that develops, owns, operates, and invests in distributed solar and energy storage projects across the United States. I also serve as Vice President of the Chesapeake Solar & Storage Association (CHESSA) and as Co-Chair of SEIA's Mid-Atlantic Committee.

CleanCapital has invested more than $1.5 billion in clean energy projects serving corporations, municipalities, universities, schools, hospitals, utilities, and community solar subscribers. In Maryland, we own and operate 20 projects totaling more than 26 megawatts, with more than a dozen additional projects in construction or development. Many of these projects will participate in the state's community solar program, delivering meaningful savings to low- and moderate- income (LMI) households and expanding access to clean energy for customers who otherwise would not be able to benefit.

At a time when Marylanders are facing significant increases in their utility bills, expanding access to community solar is one of the most immediate tools available to provide relief. Community solar subscribers receive consistent and considerable bill savings without the upfront costs of installing solar. For LMI households, these savings are both meaningful and predictable.

SB 843 builds on the success of Maryland's community solar framework by creating new, practical pathways to ensure that additional LMI households can receive the full benefits of program participation. Under current law, community solar energy generating systems (CSEGs) must dedicate at least 40% of their kilowatt-hour output to LMI subscribers. The SUNRISE Act expands compliance flexibility by establishing two additional methods for satisfying this requirement:

1. Allowing CSEGs to dedicate 8% of annual output at no cost to eligible households through coordination with the Office of Home Energy Programs (OHEP) or the Maryland Energy Administration (MEA); and

2. Enabling coordination with OHEP or another local administering agency to identify and enroll eligible households directly.

These additional pathways are both pragmatic and impactful. By leveraging existing state agencies that already serve income-qualified households, SB 843 ensures that community solar bill credits reach the Marylanders who need relief the most – including hard-to-reach and vulnerable ratepayers who may not otherwise enroll in the state's community solar program.

The bill also appropriately recognizes the broader system value of distributed solar and the role it can play in mitigating rising ratepayer costs. Because it serves local load, reduces peak demand, and can defer certain transmission and distribution investments, distributed generation helps mitigate system costs while expanding customer choice. That makes distributed solar part of the affordability solution — not a cost driver.

Equally important, SB 843 also establishes a transparent and predictable pathway to modernize Maryland's net metering framework and creates a structured transition to a successor program. As Maryland approaches the statutory 3,000-megawatt net-metering cap established by the legislature, thoughtful transition design will be essential to ensure projects already in development can reach completion while the state prepares the next phase of its distributed energy policy.

For companies like CleanCapital — long-term owners and institutional capital providers to distributed generation developers nationwide — predictable transition rules are essential to ensuring that projects already in development can reach completion.

Distributed solar projects require significant upfront investment and typically move through a multi-year development process that includes site control, engineering studies, permitting, and utility interconnection. Many projects currently in development were planned based on the framework the legislature established when it adopted the 3,000-megawatt net-metering cap. Ensuring that transition rules are clear and predictable will help ensure those projects can move forward and continue delivering bill savings to Maryland customers.

In practice, this means ensuring that projects which have advanced through clearly defined development milestones — such as securing a position in the community solar energy generating systems approved program queue — can proceed under the framework in place when those investments were made.

In Maryland, many projects currently under development are advancing with the expectation that capital providers like CleanCapital will acquire and own them upon completion. For those projects, clarity around transition rules is not academic — it is determinative. Regulatory uncertainty at the boundary between existing and successor programs directly affects whether capital can be committed to complete projects already in development.

That is why it is critical that the SUNRISE Act's transition provisions (a) protect projects that have made material investments under the current framework and (b) provide clear, predictable rules for projects moving into the successor program. A well-designed transition will ensure Maryland

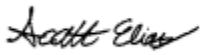
continues attracting private capital to deploy one of the few energy resources that can be built quickly, reduce peak pressure, and deliver savings directly to customers.

Stable and predictable program transitions allow developers and investors to plan around clear timelines — ensuring that projects already underway can move forward and continue delivering bill savings and local investment.

CleanCapital respectfully urges the Senate Education, Energy, and the Environment Committee to issue a favorable report on SB 843.

Thank you for your consideration and for your continued leadership on advancing equitable clean energy policy in Maryland.

Respectfully submitted,



Scott Elias,
Director of Policy and Market Development
CleanCapital
selias@cleancapital.com

SB 843 fav w amd PSC.pdf
Uploaded by: Barve Barve
Position: FWA

STATE OF MARYLAND

PUBLIC SERVICE COMMISSION

Chair Brian Feldman
Education, Energy and the Environment Committee
2 West Miller Office Building
Annapolis, MD 21401

RE: SB 843 – Favorable with Amendments - Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)

Dear Chair Feldman and Committee Members:

The Public Service Commission ("Commission") supports SB 843's goal to create an orderly transition from traditional Net Energy Metering (NEM) to an updated and improved program. The Commission continues to work with representatives of the legislature and the solar industry to develop a process and program that are implementable and beneficial to Maryland's ratepayers.

The Commission anticipates that the State will reach the statutory cap on generating capacity owned by net-energy metering customers or Community Solar operators within the next two years. While only 1,537 MW of the 3000 MW capacity cap is currently physically operational, the pipeline of pending Community Solar projects has increased to 2,911 MW. When combined, the total demand of 4,448 MW represents 148.3% of the statutory 3,000 MW limit, meaning the cap would be exceeded by nearly 1.5 gigawatts if all pending projects are realized.[1]

The SUNRISE program seeks to move Maryland beyond its current 1:1 "kilowatt-hour netting" model and toward a more sophisticated value-based framework. The bill enables the Commission to determine the value of exported solar energy based on the benefits provided to the grid. If the bill were amended to ensure that appropriate factors would be considered as part of this valuation, this approach could help address concerns related to cost-shifting between solar and non-solar customers. The bill also provides the Commission with the needed authority to swiftly transition to a successor program once the NEM cap is reached to prevent a market freeze.

SB 843 considers how to increase access to solar incentives by low-income residents. By authorizing "opt-out" enrollment and "dedicated blocks" of capacity, the legislation intends to treat community solar as an accessible public benefit for qualified households rather than a private commercial product that requires a credit check or a signed contract. The bill also

[1] See the Commission's November 2025 Net Energy Metering in the State of Maryland Report, https://www.pscmaryland.com/wp-content/uploads/2025/12/2025-Net-Metering-Report-4.pdf.

incorporates guaranteed consumer protections for low-income customers in tandem with the shift to "opt-out" enrollment. The Commission supports the exploration of these types of programs and will continue to work with the sponsor to shape the programs.

At the same time, the Commission acknowledges that a transition to the SUNRISE program will alter the financial profile of a rooftop solar investment and make fundamental changes to the deployment of rooftop solar by homeowners and small businesses. The bill's approach to valuing solar exports may lengthen the time it takes customers to recoup their initial investment, potentially making rooftop solar less attractive to average homeowners. The Commission also notes that even with a waitlist protocol developed by the Commission for projects currently in the queue, SB 843 contains provisions that may provide structural advantages to Community Solar over rooftop solar.

In general, allowing the Commission more discretion and flexibility in designing and implementing the SUNRISE program would allow the ultimate product to be holistically informed by stakeholder input, expert advice, and the Commission's extensive experience deploying similar programs. The Commission has appreciated the opportunity to work with legislators and solar industry representatives to devise possible amendments to this bill and will continue to provide its input with the goal of achieving an effective, equitable, and implementable program.

Please contact the Commission's Director of Legislative Affairs, Niki Wiggins at irene.wiggins3@maryland.gov if you have any questions.

Sincerely,

Kumar P. Barve
Chair, Maryland Public Service Commission

SB843_Solar Landscape.pdf
Uploaded by: David Simins
Position: FWA

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O. 844.765.2769

SOLARLANDSCAPE.COM

Senate Bill 843 – Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)

Position: Favorable with Amendments

Dear Chair Feldman,

Solar Landscape respectfully urges a favorable with amendments report on SB843, which would transition Maryland from its current net energy metering framework to a Standard Utility Net Export Rate for the Integrated Solar and Energy Resource (SUNRISE) program by July 1, 2027. The legislation would establish this new structure upon the state reaching its 3 GW net metering cap and create a capacity reservation system. While we appreciate the intent to plan for the program's long-term evolution, the proposed transition raises significant concerns for the continued development of commercial and industrial rooftop solar projects in both the near and long term.

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.

Value of Commercial Rooftop Solar

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

[1] Solar Power World, 2025

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queue, saving years of delays. These projects face no zoning or siting opposition—they are built on existing infrastructure, located where electricity demand already exists. Unlike any other 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 over the next 5 years would save Maryland ratepayers $300 million by reducing reliance on costly out-of-state power purchases, in addition to the guaranteed savings for subscribers.[2] Commercial and industrial rooftop community solar is the most effective tool Maryland has to meet near-term rising demand and deliver immediate ratepayer savings.

The General Assembly explicitly recognized the unique value of commercial and industrial rooftop solar in 2024 through the passage of the Brighter Tomorrow Act and the creation of the Small Solar Generator Incentive Program (SGI). The SGI created a 1.5x SREC multiplier for systems 5 megawatts and smaller that are located on rooftops, parking canopies, brownfields, and other previously disturbed lands, provided they meet specified in-service deadlines.

Net Energy Metering

There are two primary components to how distributed solar systems are compensated: renewable energy credits (RECs) and the rate paid for exported electricity. Under current Maryland law, eligible systems are compensated at a rate comparable to the retail rate, incorporating generation, supply, and distribution components.

SB843 would direct the Public Service Commission to establish a new compensation structure for the rate paid for exported electricity through rulemaking once the 3 GW cap is reached. This framework would create two significant potential challenges for the commercial and industrial rooftop solar segment of the market.

First, transitioning to an undefined compensation structure introduces material uncertainty for projects currently in development and for future investment in Maryland's distributed solar market. Commercial and industrial rooftop projects operate on 12- to 24-month development timelines. Financing partners must be able to model compensation over the life of the asset at the time financing is provided. Absent clear and predictable pricing, capital providers are unlikely to finance projects. This needed clarity will not be available until the Public Service Commission establishes the new compensation structure, effectively slowing or halting development during the transition period.

[2] "Maryland Value of Commercial Rooftop Solar", Brattle Group, January 2026

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Second, even once clarified, the new compensation structure may be economically unviable for commercial and industrial rooftop projects, thereby halting development entirely. It is important to distinguish between market segments when evaluating net energy metering compensation. Perceived excess returns are typically associated with ground-mounted, greenfield projects that benefit from lower land acquisition costs, lower construction costs, and economies of scale. Commercial and industrial rooftop solar projects operate under materially different conditions. These projects require negotiated rooftop leases typically in higher cost urban areas, involve more complex engineering and construction, and are constrained by structural and physical characteristics of existing buildings. As a result, project margins are narrower and more sensitive to changes in compensation.

As written, the SUNRISE rate puts approximately 40% of a system's energy value at risk.

If compensation is set by the Public Service Commission at a level that is financially non-viable for commercial and industrial rooftop solar projects, and which does not reflect the higher costs and system benefits of these projects, commercial and industrial rooftop solar projects will no longer be able to be built in Maryland. In recognition of the unique siting, reliability, and ratepayer benefits of commercial and industrial rooftop solar, we respectfully request that these projects be permitted to continue operating under the existing net energy metering framework or an equivalent structure that preserves economic viability.

Conclusion

As Maryland plans for the future of its distributed generation framework, it is critical that policy changes preserve market stability, protect projects already in development, and reflect the distinct economics and grid benefits of different solar market segments. With targeted amendments to ensure pricing clarity and recognize the value of commercial and industrial rooftop projects, SB843 can provide a durable path forward without disrupting ongoing investment.

Solar Landscape remains committed to partnering with the General Assembly, the Public Service Commission, and other stakeholders to ensure Maryland continues to lead in community solar deployment while maintaining a stable and investable policy environment. We respectfully urge a favorable with amendments report on SB843.

SB 843-Favorable with Ammendments- MEAC .pdf
Uploaded by: Laurel Peltier
Position: FWA

SB 843 Net Metering, SUNRISE Program, and Community Solar Energy Generating Systems Programs (SUNRISE Act)

Maryland Energy Advocates Coalition

WORKING TO ENSURE AFFORDABLE UTILITY BILLS FOR LIMITED INCOME FAMILIES THROUGH ADVOCACY, REPORTING, & EDUCATION.

Education, Energy and Environment Committee
Hearing 3/5/26
Senator Feldman
Favorable with Amendment

Testimony from Laurel Peltier, Chair of Maryland Energy Advocates

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Good afternoon, Chair Feldman, Vice Chair Kagan, and members of the Education, Energy and the Environment Committee. My name is Laurel Peltier, and I Chair the Maryland Energy Advocates Coalition. We work to ensure that limited-income families can afford their utility bills.

There are 2 tactical issues that the SB843 SUNRISE Act solves to maximize solar credits savings that truly hit limited income utility bills. We fully support Section O as it's written. Our request is to amend Section P to represent 10% of the total project's energy load, up from 8%, which will deliver more money to direct state energy assistance programs.

Section O allows for simpler account enrollment by Subscriber Organizations for limited and middle income (LMI) to access at least a 20% savings on their electricity bills. Section P offers another pathway to ensure that 40% of a solar project's generation offers direct savings to limited and middle income families.

Num. 1- Section O is a regulatory addition to allow for a Solar Subscriber Organization to enroll an account with a written or verbal approval. It's unclear in the current Public Service Commission regulations if a verbal agreement is legal. Section O clarifies this action. Getting an email signature for a limited income account may sound simple, but it's not. Many people are not tech savvy, don't use email, and the back and forth to have someone draw their signature on a mobile phone is unnecessary for a solar savings product that has only consumer upsides with no downsides. In today's environment, no email signature means no community solar enrollment and the LMI account loses out.

There is no downside to Community Solar, unlike previous retail energy contracts before SB1. Section O will allow LMI accounts to be automatically enrolled, and get solar credits applied directly to their utility bills. SUNRISE also provides an incentive for a

local energy assistance office to earn funds that can offset expenses and / or be distributed to recipients.

Num 2- Section P is the bigger fix and solves an issue in Maryland's less populated areas. The problem is that enrolling in LMI accounts is more difficult, particularly in rural areas. Section P was created for potential projects in the Potomac Edison and Delmarva territories.

Section P develops a process for a solar developer to make a yearly direct payment to the Department of Social Services Office of Home Energy Programs (OHEP). Each year, an interested developer sends a payment equal to 25% solar credit savings. Here's the math: 25% LMI savings of 40% of the farm's energy load equals 10% savings payment on 100% of the solar farm's energy load.

These funds can be added to the current OHEP grant fund budgets and give more grants to rural area OHEP recipients. Those grants are already in place along with the utility billing feeds.

- Section P's real benefit is that solar developers have no risk in meeting the state's required 40% LMI goal in rural areas. With this risk eliminated, solar developers will hopefully build more solar.
- Subscriber organizations still sell the product to middle and higher income accounts and have more subscriptions in total because more solar could be developed.
- Limited income families in these rural areas get more utility grants. Their energy burdens are higher than suburban and urban areas (they match Baltimore's 14% energy burden) and higher grants make utility bills more affordable.
- Reduces the limited income mechanism rate payer impact that will begin on 1/1/27. The limited income tiered discount is applied *after* community solar grants. Section P helps commercial and residential rate payers.

Thank you for a favorable with amendment Committee report.

Laurel Peltier

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SB0843(HB1195) - FWA - Net Energy Metering, SUNRI

Uploaded by: Megan Outten

Position: FWA

Maryland Energy Administration

TO: Chair Ferguson, Vice Chair Kagan, and Members of the Education, Energy, and Environment Committee
FROM: MEA
SUBJECT: SB 843 - Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)
DATE: March 12, 2026

MEA Position: FAVORABLE WITH AMENDMENTS

The Maryland Energy Administration (MEA) is generally supportive of adopting a new method of incentivising net metering beyond the current 3,000 MW cap that is enshrined in law. Net metering allows access to the benefits of solar for populations that cannot, for whatever reason, install solar on their rooftops through community solar. SB 843 is largely focused on continuing the benefits of solar for these populations.

MEA would like to thank the sponsor of the bill for raising this important and timely issue, and for his historical concentration on energy and environmental issues.

MEA understands the need for certainty for community solar developers, and appreciates the bill's creation of a method of reserving capacity under the net metering scheme. However, MEA would seek changes to the proposed legislation to give the Public Service Commission (PSC) greater flexibility in determining the future incentive (beyond 3,000 MW) through an inclusive process and rulemaking.

Furthermore, MEA would seek to remove itself from subsection 7-306.2(p) of the bill. While MEA is supportive of assigning community solar generation capacity to households experiencing low income, MEA does not have the capability to identify such households. This responsibility is best left to the Office of Home Energy Programs as otherwise outlined in the bill.

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.

FirstEnergy UNFAV EEE - SB843.pdf
Uploaded by: Timothy Troxell
Position: UNF

PotomacEdison
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OPPOSE – Senate Bill 0843

SB0843 – Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act)

Education, Energy, and the Environment Committee
Thursday, March 12, 2026

Potomac Edison, a subsidiary of FirstEnergy Corp., serves approximately 293,000 customers in all or parts of seven Maryland counties (Allegany, Carroll, Frederick, Garrett, Howard, Montgomery, and Washington). FirstEnergy is dedicated to safety, reliability, and operational excellence. Its electric distribution companies form one of the nation's largest investor-owned electric systems, serving customers in Maryland, Ohio, Pennsylvania, New Jersey, New York, and West Virginia.

Unfavorable

Potomac Edison / FirstEnergy respectfully requests an Unfavorable report on SB-843 - *Net Energy Metering, SUNRISE Program, and Community Solar Energy Generating Systems Program (SUNRISE Act),* which proposes a complete overhaul of Maryland's net energy metering (NEM) and Community Solar programs.

While the stated intent of this legislation is to advance equitable clean-energy adoption and expand low-and moderate-income (LMI) customer access, as drafted SB-843 would significantly increase costs for non-participating ratepayers, impose substantial administrative burdens on utilities, and expand existing inequities in the current NEM framework.

Despite presenting the SUNRISE Program as a successor to net metering, the bill effectively functions as an unrestricted expansion of NEM by tying export compensation to no-less than the Standard Offer Service (SOS) rate - including energy, capacity, and transmission value. While this would be a significant improvement from the current policy providing a full retail bill credit, this value still ensures that NEM credits exceed the actual value of the output provided to utilities which only includes the energy portion. This overvaluation of the generation received results in excessive compensation for output to the grid from Community Solar and NEM systems and shifts unrecovered costs directly onto non-participating residential customers. This effect is particularly harmful in Potomac Edison's service territory, where a disproportionally higher share of Community Solar projects are being developed, and NEM-related cost shifts are increasing customer bills.

A larger concern is that SB-843 directs the Public Service Commission (Commission) to incorporate a wide range of environmental, societal, and reliability "benefits" into the credit-setting process - even though many of these values cannot logically be provided by Community Solar and NEM systems, are impossible to measure, or are unsupported by evidence. Embedding unquantifiable benefits into statute guarantees inflated export credits for the output of Community Solar and NEM systems and further entrenches inequitable cost allocation for customers. Credit-setting should be limited to the empirically measurable value of the energy provided to utilities.

The bill also mandates a statewide capacity reservation system with automatic acceptance and transferability, creating the potential for speculative resale markets, duplicative interconnection processes, and administrative inconsistencies with existing Commission regulations. Uniform interconnection timelines and new utility upgrade procedures can conflict with current rules, create operational inefficiencies, and risk project delays - undermining the very transparency and predictability the bill seeks to establish. To the extent a reservation process is needed, authority to create the process should be delegated to the Commission, which can engage a collaborative process of utilities and other stakeholders to consider and recommend an administratively appropriate process.

The LMI enrollment framework proposed in SB-843 also raises practical and further equity-related concerns. The "Opt-Out" enrollment requirement would likely create customer confusion, increase utility call center volume, and reduce the programs transparency. "Opt-In" enrollment is preferred, as it is more transparent and more easily understood by customers. Additionally, geographically based eligibility risks automatically enrolling higher-income individuals into the program who simply reside in designated communities. These customers would not meet standard LMI definitions, so neither they nor a Community Solar developer should be able to reap the benefits of the LMI designation. Furthermore, the bill's 20% minimum savings level for LMI customers falls below today's typical community solar discount for qualifying LMI customers, and unless raised, may result in diminished real benefits for low-income customers.

Finally, SB-843 assigns program design responsibilities to the utilities – responsibilities that traditionally fall under the duties of the Commission. Requesting utilities to develop statewide program architecture and regulatory frameworks is confusing. Utilities should provide operational expertise and system data, not lead regulatory design processes traditionally and appropriately overseen by the Commission.

Although Maryland's NEM system needs reform, SB-843 does not directly address the underlying cost-shifting inequities facing non-solar residential customers. Instead, this bill would further exacerbate the inequities while also creating new administrative complexity and programmatic uncertainty. Potomac Edison's customers already bear one of the highest proportional NEM subsidy burdens in the state – and this bill would only further accelerate cost impacts with no corresponding system or ratepayer benefits.

Unless SB-843 is significantly amended to align export credits with actual avoided costs, preserve existing interconnection processes, require opt-in LMI participation, and maintain PSC-led program development, this legislation offers little tangible benefit to either the company or its customers. For these reasons, **Potomac Edison / FirstEnergy respectfully requests an Unfavorable report on SB-843**.