



Position Statement

Letter of Information
Environment and Transportation
2/17/2026

House Bill 642-Electric Companies - Service Outages and Rate Increases - Report on Customer Impact

Baltimore Gas and Electric Company (BGE) submits this letter of information for consideration of **House Bill 642-Electric Companies - Service Outages and Rate Increases - Report on Customer Impact**. *House Bill 642* would require each electric company, by April 1 each year, to report to the Public Service Commission (PSC) geographic and demographic data for customers impacted by 1.) outages lasting two hours or longer, 2.) scheduled maintenance outages of any duration, 3.) any outage during an inclement weather event, including time to restoration, and 4.) customers impacted by a rate increase.

We appreciate the bill's intent to promote data-driven decision-making. However, House Bill 642 would duplicate extensive reliability reporting already required by the PSC and impose undue administrative burdens on utilities to comply. As drafted, the legislation raises several significant concerns.

First, House Bill 642 requires utilities to report on "customers impacted by a rate increase." When the PSC approves a distribution rate case, the resulting rates apply to **all customers within each rate class – regardless of geographics or demographics**, making the reporting requirement unnecessary.

Second, the bill duplicates existing reliability reporting frameworks that are already robust, detailed, and subject to annual PSC review. By law and regulation, BGE provides comprehensive reliability data covering outage frequency, duration, causes, and long-term trends. Maryland law already requires each electric company to file an annual performance report with outage counts and duration metrics used by the PSC to assess performance. These filings are thoroughly reviewed by the Commission Staff and others, including the Office of People's Counsel; a hearing is held where the Commission can ask questions of the electric companies, and an order is issued addressing any COMAR violations and any Commission concerns - all of which demonstrate that a structured oversight system is already firmly in place.

For example, under **COMAR 20.50.01.03A**, Maryland utilities must report CAIDI (Customer Average Interruption Duration Index), System Average Interruption Duration Index (SAIDI), and System Average Interruption Frequency Index (SAIFI) for all feeders with the poorest reliability.

BGE, headquartered in Baltimore, is Maryland's largest gas and electric utility, delivering power to more than 1.3 million electric customers and more than 700,000 natural gas customers in central Maryland. The company's approximately 3,400 employees are committed to the safe and reliable delivery of gas and electricity, as well as enhanced energy management, conservation, environmental stewardship and community assistance. BGE is a subsidiary of Exelon Corporation (NYSE: EXC), the nation's largest energy delivery company.

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These indices must be calculated using full interruption data as well as data excluding source loss, major events, and planned outages. Utilities must identify feeders performing 250 percent or more above the systemwide average, and no feeder may appear on this list for three consecutive years without documented remediation efforts. This demonstrates that Maryland already has a targeted, data-rich approach to monitoring underperforming feeders.

Third, House Bill 642 would require utilities to report every outage over two hours, all planned maintenance outages regardless of duration, all outages during inclement weather, and detailed restoration times. The PSC already requires extensive outage and reliability reporting under COMAR, and the bill's additional requirements do not offer clear incremental benefit.

Finally, House Bill 642 requires reporting "demographic data" for customers affected by outages or rate increases but does not define the term. The only information tracked by BGE that could be considered "demographic data" is for residential customers who self-identify as being handicapped or elderly, have a serious illness or a need for life-support equipment (as each is defined in COMAR 20.31.01.02) and for residential customers who have received energy assistance from the State. As explained above, rate increases are applicable to all customers within a rate class with no difference based on "demographic data" and there are already mechanisms in place to ensure customers receiving safe and reliable electric service regardless of where they reside.

BGE shares the Committee's commitment to transparency and improving understanding of customer impacts. Our Letter of Information is intended to ensure that House Bill 642 generates useful insights **without** duplicating existing PSC reporting or introducing avoidable administrative challenges. We appreciate the opportunity to provide this information and look forward to working with the Committee.

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