



**Testimony on:** HB0928– Certificates of Public Convenience and Necessity -  
**Transmission Lines - Applicability and Waivers**  
**Committee:** Environment and Transportation  
**Organization:** Maryland Legislative Coalition Climate Justice Wing  
**Submitting:** Dave Arndt, CoChair  
**Position:** Favorable  
**Hearing Date:** February 24, 2026

Dear Chair Feldman and Committee Members:

Thank you for allowing our testimony today in support of HB0928, Certificates of Public Convenience and Necessity - Transmission Lines - Applicability and Waivers. The Maryland Legislative Coalition Climate Justice Wing, a statewide coalition of 32 grassroots and professional organizations focused on climate justice, urges you to vote favorably on HB0928.

HB0928 will fix a current loophole that exempts underground transmission lines from getting a Public Service Commission (PSC) Certificate of Public Convenience and Necessity (CPCN). The bill will expand the application requirements for the construction of overhead transmission lines to include other transmission lines and repeal a requirement that the PSC waive the CPCN requirement under certain circumstances like underground transmission. The bill also requires the PSC to consider specific factors when determining whether to waive, for good cause, the requirement to obtain a CPCN, specifically: 1) the cost of construction on ratepayers; 2) the impact of construction on the environment; and 3) any other matters the PSC deems appropriate.

Currently, BGE is planning to build an underground 115kv transmission line in Baltimore. Residents of the communities affected would like the PSC to review this line through the CPCN process. This would ensure the BGE customers fully understand the cost, impacts of the construction to the environment and the neighborhoods, and whether it is necessary and the best route has been selected.

The CPCN exemption for underground transmission lines makes no sense and forecloses a transparent public process. An underground transmission line may cost more and disturb the local communities more than an above ground transmission line. Marylanders deserve to know the cost and impacts from transmission line construction regardless of whether it is above or below ground. The proposed Baltimore underground transmission line may still be approved, however, residents should be granted the opportunity for a public hearing and public comment to decide the merits rather than having the decision being made by BGE alone with PJM approval of the cost.

Accordingly, we urge this committee to issue a FAVORABLE report.

350MoCo  
Adat Shalom Climate Action  
Cedar Lane Unitarian Universalist Church Environmental Justice Ministry  
Chesapeake Earth Holders  
Chesapeake Physicians for Social Responsibility  
Climate Communications Coalition  
Climate Parents of Prince George's  
Climate Reality Greater Maryland  
ClimateXChange  
Coming Clean Network, Union of Concerned Scientists  
DoTheMostGood Montgomery County  
Echotopia  
Elders Climate Action  
Fix Maryland Rail  
Glen Echo Heights Mobilization  
Greenbelt Climate Action Network  
HoCoClimateAction  
Howard County Indivisible  
Maryland Legislative Coalition  
Maryland Energy Advocates  
Maryland Third Act  
Mizrahi Family Charitable Fund  
Mobilize Frederick  
Montgomery County Faith Alliance for Climate Solutions  
Montgomery Countryside Alliance  
Mountain Maryland Movement  
Nuclear Information & Resource Service  
Progressive Maryland  
Safe & Healthy Playing Fields  
Sierra Club Maryland Chapter  
Takoma Park Mobilization Environment Committee  
The Climate Mobilization MoCo Chapter  
Unitarian Universalist Legislative Ministry of Maryland