



**MAREC  
ACTION**

March 31, 2026

**MAREC ACTION AND OCEANTIC NETWORK TESTIMONY SB 270 AS AMENDED:**

**UNFAVORABLE**

Chair Korman, Vice Chair Guyton, members of the Environment and Transportation Committee,

MAREC Action (informally, “Mid-Atlantic Renewable Energy Coalition”) and Oceantic Network writes in opposition to SB 270 as amended, Full Costs and Benefits Analysis of Sources of Electricity Generation. MAREC Action is a Maryland-based coalition of over 50 utility-scale solar, wind, and battery storage developers and manufacturers dedicated to the growth and development of renewable energy across the PJM grid region. The Oceantic Network is a collaborative global nonprofit network advances ocean renewables markets and builds robust supply chains of local companies, including 50 Maryland companies in the offshore wind industry.

As amended, SB 270 requires the Public Service Commission (PSC) to conduct an analysis of the “full costs and benefits of sources of electricity generation in Maryland,” using the “Levelized Full System Cost of Electricity” (LFSCOE) formula. We appreciate the Legislature’s commitment to data driven energy policy, with the goal of ensuring affordable energy bills for Marylanders. However, the LFSCOE is a formula that originates from non-peer reviewed research and is not widely accepted among energy policy professionals. The resulting analysis required by SB 270 would waste limited state funds to produce a misleading and flawed study about electricity costs and reliability in Maryland. We support the PSC’s suggested amendments in their testimony to expand the study to other peer reviewed models, however, the Senate chose not to adopt those amendments.

The LFSCOE model looks at the costs of serving the entire electricity grid with just one resource, whether it be natural gas, nuclear, offshore wind, or solar. These scenarios are wholly unrealistic and have no bearing on the realities of Maryland’s electric grid, which relies on a diverse portfolio of energy generation types. The resulting analysis drastically inflates the cost of wind and solar resources, as they would have to be overbuilt to provide 100% of the state’s electricity needs. As fuel-free, zero marginal cost resources, renewable energy projects provide a hedge to volatile natural gas price spikes, and these savings are not captured in the LFSCOE analysis.

Electricity prices in Maryland are influenced by PJM’s wholesale energy and capacity markets, which are served by a wide swath of different energy resources in competition with



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each other. No energy grid is served by just one resource, and thus, no Maryland ratepayer would ever have to pay the “levelized full system costs” of a certain generation type that would come out of the LFSCOE analysis. The Legislature should not give credibility to this flawed metric by requiring the PSC to run this study, as it has no basis on the realities of Maryland’s energy prices.

For these reasons, MAREC Action and Oceantic Network opposes this legislation and urge the committee to issue an unfavorable report on SB 270.

Thank you,

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