



Position Statement

Favorable with Amendments
Environment & Transportation
2/3/2026

House Bill 40 – Public Utilities - Transmission Lines - Advanced Transmission Technologies

Baltimore Gas and Electric Company (BGE) supports with amendments **House Bill 40 – Public Utilities - Transmission Lines - Advanced Transmission Technologies**. *House Bill 40* requires an applicant for a certificate of public convenience and necessity (CPCN) for the construction of an overhead transmission line to include in its application, an analysis of alternatives to the proposed transmission line, including the use of advanced transmission technologies.

BGE remains committed to supporting grid-enhancing technologies that strengthen reliability, while prioritizing affordability for our customers.

House Bill 40 would add new requirements to the Maryland Public Service Commission's Certificate of Public Convenience and Necessity (CPCN) process, which typically takes 12–18 months. Current law already requires CPCN applicants to evaluate alternatives, including use of existing rights-of-way and route options, with detailed consideration of environmental, community, land use, and cost impacts. Many of the evaluation criteria in *House Bill 40* are already addressed in federal processes, including FERC Order 1920 and FERC Order 2023, which considers grid-enhancing technologies, including advanced conductors. Integrating State priorities into existing regional and federal planning processes is more appropriate than expanding the CPCN process in ways that could delay critical projects.

The bill also creates inconsistent definitions of advanced conductors, conflicting with those definitions in FERC Order 1920 and 2023, and reinforced in FERC Order 2023-A. For example, *House Bill 40*'s definition of high-performance conductors would exclude aluminum conductor, steel supported conductors (ACSS), despite their superior performance over traditional ACSR conductors. As written, the bill would limit engineers' ability to choose the most cost-effective technical solutions when executing large-scale infrastructure projects. More importantly, the bill would require utilities to evaluate other technologies before making equipment upgrades, even when those equipment limitations, not conductors, are the true constraint, which may not deliver the expected benefits. We strongly urge the bill sponsor to amend the definition of high-performance conductors to align with the definition found in FERC Order 1920, 2023, and 2023-A.

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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BGE does caution that by expanding the required analysis, the bill could force consideration of less economical and less reliable transmission options, increasing costs for applicants and customers, the Commission, and State agencies such as PPRP. It would also slow the permitting and siting of overhead transmission lines, potentially delaying PJM-mandated projects, jeopardizing system reliability, and risking noncompliance with federally enforceable North American Electric Reliability Corporation standards.

BGE will continue discussions with the bill sponsor to address our concerns. We respectfully request a favorable report with specified amendment for House Bill 40.

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