February 17, 2025

112 West Street
Annapolis, MD 21401

Letter of Information – House Bill 642-Electric Companies - Service Outages and Rate Increases - Report on Customer Impact

Potomac Electric Power Company (Pepco), and Delmarva Power & Light Company (Delmarva Power) submit this letter of information for consideration of **HB 642- Electric Companies - Service Outages and Rate Increases - Report on Customer Impact.** We appreciate the intent to be data driven; however this legislation duplicates existing reliability reporting and creates unnecessary privacy and costly administrative burdens. House Bill 642 would require each electric company, by April 1 each year, to report to the PSC geographic and demographic data for customers impacted by:

- outages lasting two hours or longer,
- scheduled maintenance outages of any duration,
- any outage during an inclement weather event, including time to restoration, and
- customers impacted by a rate increase.

Currently, Pepco and Delmarva Power already provide the PSC with robust reliability reporting—by law and regulation—designed to measure outages, duration, causes, and performance trends systemwide and over time. Maryland law already requires each electric company to submit an annual performance report summarizing reliability performance for the preceding year and including outage counts and duration-related metrics that the PSC uses to assess reliability and utility performance. The PSC actively reviews these filings and issues orders on annual electric reliability performance reports—demonstrating that a structured framework is already in place.

HB 642 requires reporting "demographic data" on customers impacted by certain outages and rate increases. However, the bill does not define:

- what "demographic data" includes (income, race/ethnicity, age, language, disability, etc.),
- whether it is drawn from verified customer-provided information or inferred proxies,
- the geographic resolution expected (address-level, block group, zip code, operating district).

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Exelon (Nasdaq: EXC) is a Fortune 200 company and the nation's largest utility company, serving more than 10.5 million customers through six fully regulated transmission and distribution utilities — Atlantic City Electric, BGE, ComEd, Delmarva Power, PECO, and Pepco. Exelon's 20,000 employees dedicate their time and expertise to supporting our communities through reliable, affordable and efficient energy delivery, workforce development, equity, economic development and volunteerism.

Without clear definitions and aggregation requirements, the reporting could unintentionally raise customer privacy and data stewardship concerns—especially when paired with granular geography.

HB 642 requires reporting for any outage over 2 hours; all scheduled maintenance outages regardless of duration, and each outage during inclement weather events regardless of duration, plus restoration time. The PSC already requires extensive reliability index reporting and supporting interruption data under COMAR.

In closing, Pepco and Delmarva Power share the Committee's interest in transparency and understanding customer impacts. Our Letter of Information is offered to help ensure HB 642 produces actionable insight—without duplicating existing PSC reliability reporting or creating unnecessary privacy and administrative burdens. Thank you for the opportunity to provide information.

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