

Dear Chair Korman,

Solar Landscape respectfully urges careful consideration of HB 1476 and asks for a favorable report with amendments.

As drafted, the bill would take effect on an emergency basis and direct the Public Service Commission to initiate a proceeding to evaluate changes to Maryland's net energy metering framework. The bill would allow for this transition process to occur prior to the State reaching its 3 GW net metering cap, creating significant near-term uncertainty that could disrupt commercial and industrial rooftop solar projects already moving through the development pipeline.

Founded in 2012, Solar Landscape is a vertically integrated solar developer and national leader in community solar deployment. We focus on developing community solar projects on commercial and industrial rooftops using a roof-lease model in which we lease the rooftops of large warehouse and storage facilities to host solar installations that deliver power back to the grid through community solar in Maryland.

Maryland is a central part of our portfolio, and our work aligns directly with the state's clean energy and equity priorities. Currently our portfolio consists of 82 projects, 45 of which have energized and are already delivering clean energy to Marylanders. The other 37 projects are currently under development. All our current projects have been awarded funding under the Maryland Energy Administration's Community Solar LMI PPA Grant and are committed to providing at least 51% of energy produced to either low-income or low-to-moderate-income households. Solar Landscape is ranked the #1 Maryland Commercial Solar Contractor, reflecting our sustained investment in the state's community solar program.<sup>1</sup> We remain committed to helping Maryland meet its renewable energy targets and advance energy equity.

### **Protecting Investment Certainty Under the 3 GW Framework**

HB 1476 would take effect immediately and require the Commission to open a proceeding to develop a new compensation framework in less than one year. While we respect the bill's intent, altering compensation before the 3 GW cap is fulfilled introduces financing uncertainty for projects currently in the pipeline and signals broader market instability in Maryland that would slow future capital deployment.

In the 2021 legislative session, the General Assembly enacted House Bill 569, which increased the statewide net metering cap from 1,500 megawatts to 3,000 megawatts. That

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<sup>1</sup> Solar Power World, 2025

action was a clear policy determination to extend the life of the existing net metering structure and allow continued market growth under defined rules. Developers and investors have relied on that legislative commitment when deploying capital in Maryland.

Distributed solar projects are financed based on statutory certainty. When the General Assembly adopts a compensation structure, developers execute leases, secure site control, incur engineering and interconnection costs, and commit capital in reliance on that framework. If compensation is reopened under an accelerated proceeding, even without immediate statutory change, it introduces uncertainty that can cause capital providers to pause or re-evaluate investments until the regulatory outcome is clear.

We have seen this dynamic play out in other states. In Maine, legislation enacted in 2023 (LD 1347) sunsetted the state's net energy billing program including for both energized and developing projects. Similarly, during the 2025 legislative session, Minnesota advanced legislation that would have ended its long-standing community solar program immediately. Although the proposal did not pass, even the early-stage legislative signal that a mature program could be abruptly ended created uncertainty beyond Minnesota and raised broader concerns for financing parties about policy durability in mature markets.

Even though Solar Landscape does not operate in Maine, financing partners routinely reference Maine and Minnesota as cautionary examples when evaluating market risk. When we raise capital, we spend significant time explaining why the states we operate in, including Maryland, are different. Maryland's stable and predictable legislative regime has been essential to maintaining investor confidence in the state.

If Maryland signals that compensation may be altered before the 3 GW cap is reached, financing partners will reassess how they price and allocate capital in the market. This reassessment will translate into delayed commitments, more conservative underwriting and slowed project development at a time when Maryland urgently needs generation.

Maryland has become a model distributed solar market because of its stability and legislative follow-through. Allowing the 3 GW framework to operate as enacted preserves that credibility and protects projects already under development that have relied on it for financing. We respectfully urge the Committee to ensure that any compensation changes occur only after the 3 GW cap is reached. We look forward to collaborating with policymakers to support an orderly transition that protects market confidence while advancing the state's clean energy goals.