



March 3, 2026

Members of the Maryland House Environment & Transportation Committee  
Maryland House of Delegates  
Annapolis, Maryland 21401

**RE: Written Testimony in support of House Bill 1190 and Senate Bill 26 – “Public Utilities - Off-Grid Electricity Providers – Exemption”**

Dear Chairman Korman, Vice Chair Guyton and Members of the Committee,

Bloom Energy writes in strong support of House Bill 1190 and the corresponding cross-filed Senate Bill 26. These bills provide legislation that accelerates the deployment of clean, resilient onsite energy solutions such as those offered by Bloom Energy. House Bill 1190 provides a clear and appropriate exemption for off-grid electricity providers—self-contained, behind-the-meter power systems that do not interconnect with the grid or use public rights-of-way. This clarification strengthens Maryland’s competitiveness while reducing pressure on an already strained electric grid.

Bloom Energy’s solid-oxide fuel cells have the ability to provide 24/7, ultra-reliable, low-emission onsite power directly at a customer’s facility. These systems can operate fully islanded, enabling large-load customers to meet their own needs without relying on lengthy interconnection queues. By enabling off-grid solutions, SB26 helps reduce strain on the statewide grid and protects ratepayers because costs are isolated to customers investing in their own systems—not shared by all utility customers.

We also note the importance of addressing problems with Maryland’s Building Energy Performance Standards (BEPS). Current BEPS rules penalize onsite generation—even when it is cleaner—because emissions occurring at the building count against compliance, while higher emissions from grid-supplied electricity do not. This dynamic encourages greater use of an already strained grid rather than local solutions that reduce systemwide demand and avoid costly grid upgrades. BEPS clarification in addition to efforts to advance off-grid solutions would help align state policy with grid reliability and ratepayer protection.

Bloom Energy supports this bill along with any efforts that assist in advancing Maryland’s goals to strengthen grid resilience while protecting ratepayers and reducing emissions. If you have any questions and would like to follow up with our technical experts, please do not hesitate to reach out.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian P. Noonan".

Brian P. Noonan  
Sr. Manager, Policy & Government Affairs

4353 North First Street  
San Jose, CA 95134  
408.543.1500

[bloomenergy.com](http://bloomenergy.com)