



February 10, 2026

Environment and Transportation Committee
Annapolis, Maryland

Written Testimony

HB345: Affordable Solar Act

Position: Favorable with Amendments

Thank you for the opportunity to submit testimony on House Bill 345, the Affordable Solar Act.

New Columbia Solar is a non-residential rooftop and parking canopy solar developer in Maryland and DC. Our customers are primarily commercial, multi-family residential, industrial, and institutional building owners (shortened here to “commercial rooftops” or “commercial rooftop solar”). We submit this testimony to urge you to consider the commercial rooftop solar market segment in Maryland in the Affordable Solar Act. We are concerned that, as drafted, it could harm instead of help this market and its customers, which we do not believe is the intent of the bill, and which could be addressed by a simple amendment to the listed market segments in section 7-1233(E)(1).

Commercial rooftops are already-developed sites that do not engender the controversy of solar on rural land. On top of that, solar systems located on commercial rooftops are sited directly on top of load in dense areas—exactly where solar power generation can provide the most benefit to ratepayers by eliminating distribution and transmission costs. Further, commercial rooftops are cheaper on a per-watt basis than single-family residential systems, having better economies of scale, while being much faster to develop than most groundmount systems, as they do not require CPCN approval. Commercial rooftops should be used as much as possible in meeting MD's solar goals, but their potential remains vastly underutilized, with most Maryland solar development occurring in the single-family residential and groundmount community solar sectors due to incentive structures.

The Affordable Solar Act as drafted would continue this trend, because it lumps groundmount and commercial rooftop solar into single market segments with single capacity blocks and ADIs. On page 16, section 7-1233(E)(1), the “Community Solar” market segment includes both rooftop community solar and groundmount community solar, and the “Behind the Meter (BTM) Non-residential” segment includes both BTM commercial rooftop systems and BTM groundmount systems (which are typically aggregated net-metered, or ANEM systems).

Given that in our experience, roughly 80% of commercial rooftop solar is community solar rather than BTM solar¹, we are most concerned about this issue regarding the community solar market segment, for the following reasons:

¹ **The majority of commercial building owners cannot install BTM systems on their roofs, so this market segment is actually served mostly by community solar systems.** The reason for this is that most commercial and multi-family buildings have separately-metered tenant spaces, and BTM solar systems are limited in size based on the load of the customer (*i.e.*, the building owner's metered load, which does not include tenants' meters). As the building owner's load typically only includes common spaces and outside lights in a separately-metered building, the building owner almost never has enough load to install a BTM system of sufficient size to

1. **A single capacity block for “community solar” will be dominated and quickly absorbed by groundmount community solar, which are larger, more profitable systems and therefore make up a much larger share of "community solar" than rooftop community solar.** Rooftop community solar development timelines are significantly faster than groundmount community solar systems, though, because rooftop systems do not have to apply for a CPCN, If the bill remains as written, though, commercial rooftop systems will likely struggle to get capacity reservations, extending development timelines and increasing the soft costs of the commercial rooftop market segment.
2. **The administratively-determined incentive (ADI) set for a single "community solar" block will likely be based on groundmount community solar costs, as the majority of the type of solar filling up the block, and therefore not be sufficient to incentivize commercial rooftop solar—and if it is based on rooftop solar costs, the ADI will over-incentivize groundmount community solar.** The average per-watt cost of groundmount solar is very different from commercial rooftop solar. Rooftop systems often require specialized equipment (e.g. cranes and ballasting), and, because they are smaller on average, they have less economy of scale than groundmount systems. They also typically require greater per-watt lease payments for site host customers to get agreement to install the system.

Commercial rooftop and groundmount markets are very different market segments that should not share a single capacity block and ADI. Commercial rooftop community solar shares much more in common with commercial rooftop BTM solar than with groundmount community solar. The development costs are nearly the same for a commercial rooftop system regardless of interconnection type, except that community solar, as a front-of-the-meter (FTM) interconnection, typically has somewhat higher utility permitting costs. The market distinction is most accurately based on customer/site type (homeowner vs. commercial building owner vs. landowner)—as this most often dictates system size and installation location (roof vs. ground), which are the biggest factors in determining the value and cost of a system.

We strongly supported the Brighter Tomorrow Act, which established a temporary increase in SREC incentives for rooftop systems, regardless of interconnection type. This Act has helped make many more projects possible for our commercial rooftop customers over the past year or two than would otherwise have been feasible. We were also early proponents of an administratively determined incentive program because of its potential to permanently address the fact that the SREC program is not differentiated enough to support non-residential rooftop solar without a program like the one established in the Brighter Tomorrow Act. We are concerned, however, that the way the Affordable Solar Act is currently drafted perpetuates and may exacerbate this problem rather than helping it.

This Affordable Solar Act has the potential to help all solar market segments grow while also lowering costs for ratepayers by right-sizing solar incentives based on different markets’ actual needs. We urge you to consider the commercial rooftop market segment as you draft amendments, as it is currently missing from the bill.

cover its roof or make financial sense. We find that roughly 80% of the systems installed on commercial rooftops are community solar systems as opposed to BTM systems, largely for this reason.

We recommend either:

- 1) Dividing the "community solar" market segment into "groundmount community solar" and "rooftop or parking canopy community solar;" or
- 2) Dividing the market segments up by customer type and/or system size—i.e. residential rooftop/parking canopies, commercial rooftop/parking canopies, and groundmount systems, eliminating the distinctions by interconnection type (BTM and community solar).

Thank you for considering this testimony.

Sincerely,

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