HB674 Testimony - Alex Stevens-2.pdf
Uploaded by: Alex Stevens
Position: FAV

IER INSTITUTE FOR ENERGY RESEARCH®

Statement

of

Alex Stevens

Manager of Policy and Communications
Institute for Energy Research

before the

Environment and Transportation Committee
Maryland House of Delegates

February 17, 2026

RE: House Bill 674 Public Service Commission – Full Costs and Benefits Analysis of Sources of Electricity Generation

Institute for Energy Research

1155 15th St. NW, Suite 525, Washington, D.C., 20005

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Chairman Korman, Vice Chair Guyton, members of the Environment and Transportation Committee: Thank you for the invitation to speak with you today about the affordability of electricity for Maryland residents.

My name is Alex Stevens, and I am the Manager of Policy and Communications at the Institute for Energy Research (IER). IER is a not-for-profit organization that conducts research on the functions, operations, and government regulation of global energy markets.

According to the latest data from the Energy Information Administration, Maryland's electricity rates are 35% higher than those of other states in the EIA's South Atlantic region and 20% higher than the national average.[1] Additionally, research from the Berkeley National Laboratory shows that Maryland's electricity rates have increased faster than inflation.[2]

In December 2025, I co-authored an IER report examining state trends in electricity affordability.[3] Our findings align with Berkeley Lab research showing that policies such as renewable portfolio standards and net metering significantly raise retail rates in states that adopt them aggressively.

Renewable portfolio standards (RPS) require electric utilities (or retail electricity providers) to ensure that a specified percentage (or sometimes an absolute amount) of the electricity they sell or supply comes from eligible renewable sources. Net metering is a billing policy that allows customers with small-scale renewable energy systems to receive credits on their electricity bills for the excess energy their systems generate and export to the grid.

Maryland's RPS currently requires utilities to procure an increasing share of electricity from renewable sources, with a current target of 50% by 2030.[4] The state also maintains one of the nation's most aggressive net metering programs, providing full retail-rate credits for excess energy exported to the grid from customer-owned systems, primarily solar.[5]

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[1] U.S. Energy Information Administration. (2026, January). *Table 5.6.A. Average price of electricity to ultimate customers by end-use sector, by state* [Data set]. Electric Power Monthly. https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=epmt_5_6_a

[2] Wiser, R., Barbose, G., Cappers, P., Deason, J., Forrester, S., Gorman, W., O'Shaughnessy, E., Hledik, R., Lam, L., & Yan, A. (2025, October). Recent retail electricity price trends: What do we know… or think we know? [Presentation]. Lawrence Berkeley National Laboratory & The Brattle Group. https://eta-publications.lbl.gov/sites/default/files/2025-10/presentation_retail_price_trends_drivers.pdf

[3] Stevens, A., Pyle, T., Stein, K., Orr, I., & Rolling, M. (2025, December). *Blue states, high rates: Elections have consequences*. Always On Energy Research and the Institute for Energy Research. https://www.instituteforenergyresearch.org/wp-content/uploads/2025/12/Blue-States-High-Rates.pdf

[4] Center for Climate and Energy Solutions. (2024, August). U.S. state electricity portfolio standards. https://www.c2es.org/document/renewable-and-alternate-energy-portfolio-standards/

[5] Maryland Public Service Commission. (2025, November). *Net energy metering in the State of Maryland: Public Utilities Article §7-306(j)* (16th report). Revised November 20, 2025. https://www.psc.state.md.us/wp-content/uploads/2025-Net-Metering-Report-4.pdf

In essence, these policies represent state efforts to favor certain generation technologies over others, resulting in increased costs passed on to ratepayers.

The impact of these policies on customer rates has largely been obscured by frequent comparisons of electricity generation technologies using the Levelized Cost of Electricity (LCOE), a metric that aggregates fixed and variable costs into a single standardized figure.

However, LCOE has faced substantial criticism for failing to account for key factors such as intermittency and non-dispatchability.[6] These limitations are particularly relevant to variable renewable sources such as wind and solar, which can make them appear more cost-competitive than they truly are–especially in systems that require a reliable, around-the-clock supply, such as Maryland's electric grid.

The Levelized Full System Costs approach outlined in HB674 is a better, more holistic framework, incorporating the broader costs required to deliver reliable, demand-matching electricity across an entire electricity system or market, including costs associated with system responsibility, intermittency, balancing, and integration.[7]

Focusing on the full system cost of electricity is the right strategy, as it reflects the amount that we all pay through our utility bills and through taxes. Adopting HB674 would provide Marylanders with transparent insights into how policy choices truly affect their electricity bills, focusing on what matters most: reliable and affordable service.

Thank you.

[6] Emblemsvåg, J. (2025). Rethinking the "Levelized Cost of Energy": A critical review and evaluation of the concept. *Energy Research & Social Science*, 119, 103897. https://doi.org/10.1016/j.erss.2024.103897
[7] Idel, R. (2022). Levelized full system costs of electricity. *Energy*, 259, 124905. https://doi.org/10.1016/j.energy.2022.124905

HB674 - PHI - FAV - Full Cost Analysis - ELectrici

Uploaded by: Allyson Black-Woodson

Position: FAV

February 17, 2026

Support – House Bill 674 - Public Service Commission - Full Costs and Benefits Analysis of Sources of Electricity Generation

Potomac Electric Power Company (Pepco) and Delmarva Power & Light Company (Delmarva Power) support **House Bill 674 - Public Utilities - Alternatives to Construction of New Transmission Lines**. The bill requires the Public Service Commission (PSC) to conduct an analysis of the full costs and benefits of sources of electricity generation in the State. It also requires the Commission to include recommended policy changes to support the development of energy sources with the lowest costs and greatest benefits to the ratepayers of the State and report its findings and recommendations to certain committees of the General Assembly by December 1, 2027.

Pepco and Delmarva Power support the intent of the bill, to better understand cost and benefit projections of various sources of electricity generation, given that resource adequacy is a pressing issue nation-wide and is of particular concern in Maryland. With limited in-state generation and pending retirements of dispatchable resources, Maryland relies heavily on energy imports to meet demand. The North American Electric Reliability Corporation (NERC) forecasts show electricity peak demand and energy growth between 2024 and 2033 at the highest levels in a decade. PJM is already seeing significant demand growth due to electrification and energy-intensive data centers. To maintain reliability, new dispatchable generation, storage, energy efficiency, demand response, and hybrid solutions using clean fuels are essential.

Pepco and Delmarva Power believe the PSC is the appropriate state agency to lead the analysis effort and to provide recommendations to the General Assembly on the most cost-effective and most beneficial option(s) of electricity generation. The PSC has already created a Maryland Unified Benefit-Cost Analysis (UBCA) work group that was tasked with addressing the cost-effectiveness of all Distributed Energy Resources (DERs). It would be beneficial to incorporate analysis/feedback from this work group into the requirements set forth by the legislation.

Given the amount of energy legislation coming before the General Assembly, Pepco and Delmarva Power recommend a favorable report on House Bill 674 to ensure legislators have the information and resources required to make informed decisions on the future of energy generation in the state of Maryland.

Amber Perry | Anne Klase | Allyson Black-Woodson | Poetri Deal | 410 980 5347

HB674 Letter of Support.pdf
Uploaded by: Ashley Staples Reid
Position: FAV

CALVERT COUNTY
BOARD OF COUNTY COMMISSIONERS
150 Main Street
Prince Frederick, Maryland 20678
410-535-1600
www.calvertcountymd.gov

February 13, 2026

Via Electronic Mail

The Honorable Marc A. Korman
Chair, House Environment and Transportation Committee
6 Bladen St.
House Office Building, Room 251
Annapolis, MD 21401

Re: Support for House Bill 674

Dear Chair Korman and Members of the Committee:

The Calvert County Board of County Commissioners (BOCC) writes in **strong support of House Bill 674, *Public Service Commission – Full Costs and Benefits Analysis of Sources of Electricity Generation*** and requests a **favorable** committee report.

HB 674 provides a prudent and data-driven approach by requiring a comprehensive evaluation of the full system costs and reliability impacts of various generation sources. For our residents, particularly in a rural and coastal county where resilience and affordability are critical, careful analysis is essential to protect ratepayers and ensure long-term grid reliability.

As home to the Calvert Cliffs Nuclear Power Plant, Calvert County plays a vital role in Maryland's energy portfolio and understands the importance of reliable, affordable and diversified electricity generation. Energy infrastructure supports local jobs, our tax base and household stability. In a time of rapid technological change and increasing energy demand, HB 674's data-driven evaluation of the full economic, storage and reliability impacts of various generation sources will promote sound planning, protect ratepayers and help ensure a balanced, resilient and sustainable energy future for Maryland.

For these reasons, the Board respectfully urges a favorable report on House Bill 674. Should you have any questions or require additional information, please contact Economic Development Director Julie Oberg at 410-535-1600, ext. 2485.

Sincerely,
BOARD OF COUNTY COMMISSIONERS
CALVERT COUNTY, MARYLAND

Todd Ireland, President

Mark C. Cox Sr., Vice President

Catherine M. Grasso

Earl F. Hance

Mike Hart

HB 674 - Public Service Commission - Full Costs a
Uploaded by: Christa McGee
Position: FAV

House Bill 674 - Public Service Commission - Full Costs and Benefits Analysis of Sources of Electricity Generation

Position: Support

Maryland REALTORS® supports HB 674, which would require the Public Service Commission to conduct a full costs and benefits analysis of electricity generation sources in Maryland, including analysis of ratepayer costs under specified generation mixes and consideration of additional costs necessary to address reliability and intermittency. The bill also directs use of a full system cost model and requires recommendations for policy changes that support energy sources with the lowest costs and greatest benefits to ratepayers.

Maryland REALTORS® supports a rigorous analysis that includes reliability and real-world system costs so future mandates are guided by what is actually affordable for ratepayers. Housing affordability is directly affected by monthly utility costs, and transparent analysis of full system impacts helps ensure energy policy decisions reflect both price and reliability instead of assumptions that may not hold in practice.

For these reasons, Maryland REALTORS® respectfully requests a favorable report.

For more information contact lisa.may@mdrealtor.org
or christa.mcgee@mdrealtor.org

BGE_ENT_FAV_House Bill 674 - Public Service Commis
Uploaded by: Dytonia Reed
Position: FAV

Position Statement

Support
Environment & Transportation
2/17/2026

House Bill 674 - Public Service Commission - Full Costs and Benefits Analysis of Sources of Electricity Generation

Baltimore Gas and Electric Company (BGE) supports **House Bill 674 – Public Service Commission – Full Costs and Benefits Analysis of Sources of Electricity Generation**. *House Bill 674* requires the Public Service Commission (PSC) to conduct an analysis of the full costs and benefits of sources of electricity generation in the State and to recommend policy changes to support the development of energy sources based on the lowest costs and greatest benefits to ratepayers. The PSC would be required to file its findings and recommendations to certain committees of the General Assembly by December 1, 2027.

BGE is supportive of the bill's goal to better understand cost and benefit projections of various sources of electricity generation, given that resource adequacy is a pressing issue nation-wide and is of particular concern in Maryland. The retirement of electricity generation facilities in Maryland is contributing to significant electricity constraints, which has increased pricing in the capacity market and has prompted multiple large-scale transmission projects to be constructed to import more energy into the State. Given the limited local generation in Maryland and pending retirements of the dispatchable generation in the state, Maryland is dependent on generation imports to achieve its electric supply. Maryland currently imports 40% of its electricity from out-of-state electricity generators to meet the energy demands of residents and businesses and that number will increase if new generation is not built in the State.

BGE believes the PSC is the appropriate state agency to lead the analysis effort and to provide recommendations to the General Assembly on the most cost-effective and most beneficial option(s) of electricity generation. The PSC has already created a Maryland Unified Benefit-Cost Analysis (UBCA) work group that was tasked with addressing the cost-effectiveness of all Distributed Energy Resources (DERs). It would be beneficial to incorporate analysis/feedback from this work group into the requirements set forth by *House Bill 674*.

BGE remains committed to supporting Maryland's energy transition and supports policies that keep affordably, resiliency, and reliability a priority. Given the amount of energy legislation coming before the General Assembly, BGE recommends a favorable report on *House Bill 674* to ensure legislators have the information and resources required to make informed decisions on the future of energy generation in the state of Maryland.

John Haysbert| Brittany Jones | Guy Andes| Dytonia Reed| 410.269.5281

HB 674 - PSC - Full Costs and Benefits Analysis of

Uploaded by: Grayson Middleton

Position: FAV

Educate. Advocate. Innovate.

Date: February 17, 2026
To: Members of the House Committee on Environment and Transportation
From: Grayson Middleton, Government Affairs Manager
Re: HB0674 – PSC - Full Costs and Benefits Analysis of Sources of Electricity Generation – **Support**

Delmarva Chicken Association (DCA) is the trade association representing the meat-chicken growers, companies, and allied business members on the Eastern Shore of Maryland, Delaware, and the Eastern Shore of Virginia. Collectively, we contribute more than $5.4 billion to Maryland's economy and pay more than $254 million in state and local taxes. We strongly support HB 674 and urge a favorable committee report.

HB 674 would require the Public Service Commission to analyze the full costs and benefits of sources of electricity in the State of Maryland. It also requires the commission to include recommended policy changes to support the development of energy sources with the lowest costs and greatest benefits to ratepayers of the State.

Rising electricity costs in Maryland have affected every citizen. However, these higher rates have been particularly damaging for chicken farmers, who already count electricity as their highest input cost. Farmers on Delmarva have seen a 6% average annual increase in their rates, and these have consistently been 7% higher than the national average for commercial customers. Compounded by weather events, HPAI, unfavorable markets, and government regulation, these costs have put an enormous amount of pressure on our farmers. We believe the State should make every effort to investigate avenues to reduce electric costs for our producers, and as such, we urge a **favorable** report.

Should you have any additional questions, please feel free to contact me at middleton@dcachicken.com or 410-490-3329.

Sincerely,

Grayson Middleton

Government Affairs Manager

PSC Cost Analysis.pdf
Uploaded by: Jeannie Haddaway-Riccio
Position: FAV

Talbot Watermen Association, Inc.
P.O. Box 324 • Bozman, MD 21612 • (410) 745-9759 • info@talbotwatermen.org

February 1, 2026

The Honorable Brian Feldman
Chair, Education, Energy, and the Environment Committee
2 West Miller Senate Office Building
11 Bladen Street
Annapolis, MD 21401

The Honorable Marc Korman
Chair, Environment & Transportation Committee
251 Taylor House Office Building
Annapolis, Maryland 21401

Dear Chair Feldman, Chair Korman, and Members of the Committee,

We are writing to express our **support** for **House Bill 674/Senate Bill 270 - Public Service Commission - Full Costs and Benefits Analysis of Sources of Electricity Generation.**

These bills would require the Public Service Commission (PSC) to conduct an analysis of the full costs and benefits of various energy sources and provide policy recommendations to the legislature by December 1, 2027. Those recommendations would be based on the energy sources that have the lowest costs and greatest benefits to Maryland's ratepayers.

Continually rising energy costs are negatively impacting the seafood industry, which is primarily made up of small businesses. We are also experiencing economic hardship as individual rate payers due to residential rate increases and congestion charges. Increasing clean, reliable, and affordable electricity generation in Maryland's portfolio will help to ease these cost burdens and make Maryland's economy more resilient. The analysis required by this legislation will provide a true picture of which sources can achieve that outcome for Maryland's energy future.

It will also provide an assessment of energy sources that disproportionately impact our industry, such as offshore wind. Offshore wind projects such as the one proposed in Ocean City impede safe navigation, disrupt habitat, damage fishing gear, and reduce our industry's ability to feed Marylanders. We believe that those consequences far outweigh the benefits. A full cost and benefits analysis will help to determine that.

Thank you in advance for your consideration, and we respectfully request a favorable report for Senate Bill 674/ House Bill 270.

Sincerely,

H. Jeff Harrison

Herman Jeffrey Harrison
President

Contact: Jeannie Haddaway-Riccio
R&R Solutions, LLC
(443) 786-2137
jeannie@randrsolutions.us

Paige Lambermont Testimony on HB674DB.pdf
Uploaded by: Paige Lambermont
Position: FAV

Statement

of

Paige Lambermont

Research Fellow
Competitive Enterprise Institute

before the

Environment and Transportation Committee
Maryland House of Delegates

February 17, 2026

RE: RE: House Bill 674 Public Service Commission – Full Costs and Benefits Analysis of Sources of Electricity Generation

Chairman Korman, Vice Chair Guyton, and members of the Energy and Transportation Committee:

My name is Paige Lambermont, and I am a Research Fellow in the Center for Energy and Environment at the Competitive Enterprise Institute. CEI is a nonpartisan public policy research organization focused on free market solutions to public policy problems.

I'm grateful for the chance to speak to you today about House Bill 674 and the opportunity to protect Maryland ratepayers.

No electricity source exists in a vacuum. The power grid is an interconnected system that exists to deliver electricity from where it is generated to where it is consumed. This happens on a near-instantaneous basis.

It only works if power is available when it is demanded, and in the correct quantities. Intermittent sources, including offshore wind, struggle to provide the degree of consistency that the power grid needs to operate.

To have the necessary level of consistency, there needs to be backup generation, often in the form of natural gas peaker plants. An understanding of the costs of various power sources that fails to take this into account is sorely lacking.

Maryland has an incredibly high Renewable Portfolio Standard (RPS) that requires over 50 percent of the state's power come from renewable sources by 2030.[1] Maryland also has high power prices 21.34 cents per kilowatt hour (kwh) in November of 2025, compared to an average of 15.86 cents per kwh for other South Atlantic states, and a U.S. average of 17.78 cents per kwh.[2]

House bill 674 would require an analysis of the costs of various sources of electricity; gas, nuclear, and offshore wind. This analysis would calculate each source's levelized full system cost of generation, rather than the cost of generating a unit of power in a vacuum, as many levelized cost of electricity models do.

This analysis would accurately account for the costs that intermittency imposes so that policymakers are able to understand the true costs and benefits of various sources of electricity.

This is especially important when considering policies such as renewables portfolio standards that impose requirements for the use of a specific type of generating source.

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[1] Department of Legislative Services, *Introduction to the Renewable Energy Portfolio Standard*, September 2025, https://dls.maryland.gov/pubs/prod/NatRes/IntroductiontotheRenewableEnergyPortfolioStandard.pdf.
[2] U.S. Energy Information Administration, *Electric Power Monthly*, Table 5.6.A, "Average Price of Electricity to Ultimate Customers by End-Use Sector, by State, November 2025 and 2024," January 26, 2026, https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=epmt_5_6_a.

Government should not adopt policies, such as Renewable Portfolio Standards, that choose winners and losers in the electricity space. The first step towards protecting ratepayers from these standards is an honest accounting of what the mandates will cost.

I urge you to take this opportunity to accurately account for the cost to Maryland ratepayers of different electricity sources. House Bill 674 helps to achieve this objective.

Thank you.

CSMC Letter of Support HB 674.pdf
Uploaded by: Randy Guy
Position: FAV

ST. MARY'S COUNTY GOVERNMENT

COMMISSIONERS OF ST. MARY'S COUNTY

James R. Guy, President
Michael R. Alderson, Jr., Commissioner
Eric S. Colvin, Commissioner
Michael L. Hewitt, Commissioner
Scott R. Ostrow, Commissioner

HB 674 - Public Service Commission – Full Costs and Benefits Analysis of Sources of Electricity Generation

COMMITTEE: Environment & Transportation
POSITION: Support

The Commissioners of St. Mary's County support **HB 674 - Public Service Commission – Full Costs and Benefits Analysis of Sources of Electricity Generation**. This bill would require the Public Service Commission ("PSC") to conduct a cost and benefit analysis for certain sources of energy generation and require PSC to deliver recommendations

Like elected officials across the state, we hear concerns from our citizens arising from affordability. Many of these concerns specifically address costs of electricity. HB 674 is commonsense: knowing what our electricity costs to produce will help policymakers make informed, knowing decisions about the costs and benefits of Maryland's energy policies.

We urge you to **support HB 674**. We believe the information that will be gleaned from this report will be valuable to decisionmakers and, in turn, valuable to the citizens of St. Mary's County. Thank you for your consideration of this matter and thank you for the opportunity to provide this testimony.

Sincerely,
COMMISSIONERS OF ST. MARY'S COUNTY

James Randy Guy, President

CSMC/AB/tr
T:/Consent/2026/016

Cc: Senator Jack Bailey
Delegate Matthew Morgan
Delegate Brian Crosby
Commissioner Mike Alderson, Jr.
Commissioner Eric Colvin
Commissioner Michael Hewitt
Commissioner Scott R. Ostrow
David Weiskopf, County Administrator
David Yingling, Deputy County Administrator
Buffy Giddens, County Attorney
John Sterling Houser, Deputy County Attorney

HB674 MDFB Written Testimony.pdf
Uploaded by: Ryan Snow
Position: FAV

Maryland Farm Bureau
3358 Davidsonville Road | Davidsonville, MD 21035
410-922-3426 | www.mdfarmbureau.com

February 17, 2026

To: House Environment and Transportation Committee

From: Maryland Farm Bureau

RE: IN SUPPORT OF – House Bill 674 Public Service Commission – Full Costs and Benefits Analysis of Sources of Electricity Generation

On behalf of the 7,000 farm families of the Maryland Farm Bureau, we respectfully request a **FAVORABLE** report on House Bill 674. Maryland agriculture operates on narrow margins and depends on reliable, affordable electricity. Irrigation, poultry house ventilation, dairy cooling, grain drying, and on-farm processing run around the clock. Even modest increases in per-kilowatt-hour rates or new demand charges directly impact farm profitability and regional competitiveness.

HB 674 aligns directly with Maryland Farm Bureau policy supporting energy reliability, rate affordability, transparency in utility ratemaking, and careful evaluation of policies that affect ratepayers. The bill directs the Public Service Commission to conduct a comprehensive, system-wide cost and benefit analysis of competing generation sources, including the full cost of reliability, transmission, backup capacity, and storage. That disciplined approach reflects our policy position that energy decisions must account for total system impacts and protect consumers, including agricultural producers.

By promoting transparency, accountability, and sound fiscal analysis, HB 674 strengthens Maryland's long-term energy planning. A clear understanding of full system costs will help ensure a balanced generation portfolio that maintains reliability, supports economic growth, and protects ratepayers. That certainty benefits farmers, rural communities, and the broader Maryland economy alike.

For these reasons, the Maryland Farm Bureau respectfully requests a **FAVORABLE** report on House Bill 674.

Please reach out to Jeannie Haddaway-Riccio at jeannie@randrsolutions.us, with any questions.

HB674 DTMorgan Testmony.pdf
Uploaded by: Todd Morgan
Position: FAV

Todd B. Morgan
Legislative District 29C
Calvert and St. Mary's Counties

Environment and Transportation
Committee

The Maryland House of Delegates
6 Bladen Street, Room 215
Annapolis, Maryland 21401
410-841-3319 · 301-858-3319
800-492-7122 *Ext.* 3319
Todd.Morgan@house.state.md.us

THE MARYLAND HOUSE OF DELEGATES
ANNAPOLIS, MARYLAND 21401

HB 674 – Public Service Commission –
Full Costs and Benefits Analysis of Electricity Generation
February 17, 2026

Chair Korman, Vice-Chair Guyton and Members of the Committee:

Thank you for the opportunity to present House Bill 674, a bipartisan, pro-rate-payer energy bill.

Why This Bill Is Being Introduced

Maryland is in the middle of a serious and ongoing energy discussion in 2026. Electricity demand across the region continues to rise, driven in part by data center development in neighboring Virginia and by Maryland's electrification policies. At the same time, the retirement of coal and oil generation facilities has reduced in-state dispatchable generation without adequate replacement.

The result is higher prices and growing reliability concerns. During the 2026–2027 capacity auction conducted by PJM Interconnection, prices increased dramatically compared to the previous year. PJM has also warned that our region could face a capacity shortage.

Our constituents feel this every month on their electric bills. They deserve transparency about what different energy sources truly cost, and what benefits they provide.

What the Bill Does

HB 674 requires the Maryland Public Service Commission to conduct a full costs and benefits analysis of electricity generation sources in the State, including:

- Natural gas
- Nuclear
- Offshore wind
- Energy storage

By December 1, 2027, the Commission must report its findings and policy recommendations to the Senate Education, Energy, and the Environment Committee and the House Environment and Transportation Committee.

This study is intended to give the General Assembly objective, data-driven information to guide future energy policy decisions.

Why a "Full" Analysis Matters

Currently, many energy comparisons rely on what is called the Levelized Cost of Electricity, or LCOE. This looks at the average cost to generate electricity from a specific technology over time. While useful, it does not capture the entire picture.

LCOE often does not account for:

- Intermittency – when power generation depends on weather or time of day
- Non-dispatchability – when a source cannot be turned on or off to meet demand
- The cost of backup generation
- The cost of storage
- Grid integration and reliability expenses

For example, intermittent energy sources often need dependable backup power to keep electricity flowing when they are not producing. Those extra costs are not always included in simple comparisons between power sources. One megawatt of intermittent power is not the same as one megawatt of power that is available whenever it is needed. Extra infrastructure and reserve capacity are often required, and those added costs are ultimately passed on to customers.

HB 674 directs the Commission to go beyond basic LCOE and evaluate the full system costs and benefits, including reliability, affordability, and overall impact on ratepayers.

To be clear, this bill is **not** a criticism of renewable energy or any specific technology. It does not mandate changes to our energy mix. It simply asks for a comprehensive, transparent analysis so that future decisions are based on complete information.

Why It Is Important to Pass Now

In 2026, energy policy is one of the most significant issues before this body. Members of this committee bring different perspectives on how Maryland should generate electricity. While we may disagree on the path forward, we share a common responsibility: protecting Maryland ratepayers.

Before we commit to additional long-term policies, mandates, or subsidies, we should understand the full economic impact of each energy source.

HB 674 is a commonsense step. It prioritizes affordability, grid reliability, and transparency. Most importantly, it puts our constituents first.

For these reasons, I respectfully request a favorable report on House Bill 674. Thank you for your time and consideration.

SB270-HB674.Pavlak.FWA_SourcesElectricityGeneratio

Uploaded by: Alex Pavlak

Position: FWA

February 17, 2026

SB270-HB674.Pavlak.FWA

Full Costs and Benefits Analysis of Sources of Electricity Generation

Written testimony

My latest OpEd in the Baltimore Sun argues that Maryland needs a vision of net-zero. The classic strategic planning process is a sequence that 1) starts with a goal, 2) quantifies factual options, then 3) makes the political value choice of which option serves as a vision. This bill tackles task #2.

To create a vision (not a system design) the level of analysis is called concept modeling, what engineers sometimes call "toy models." It focusses on those parameters that have a first order impact on the relationship between components (wind and PV for example) and ignores parameters that do not affect relationships, like transmission. The map in the adjacent figure concludes that the configuration of a minimum cost wind + PV + storage (only) system that satisfied Maryland's 2021 load profile would consist of 400 GW PV, 8700 GW onshore wind and 1,460 GWh storage.

The bill needs more specificity to task concept modeling and avoid the unnecessary system design details.

	PV nameplate (GW)										
OnSW\PV	0	100	200	300	400	500	600	700	800	900	1000
0											1410
100									550	487	461
200						487	435	422	413	408	409
300					402	394	394	393	393	393	394
400					379	378	378	378	378	379	380
500			424	365	364	363	363	363	364	365	366
600		519	400	350	348	348	349	349	350	351	356
700	888	479	382	335	334	334	335	336	344	359	374
800	672	452	365	329	321	323	334	349	364	379	394
900	565	438	364	334	327	340	355	369	384	399	415
1000	548	430	369	346	347	360	375	389	405		
1100	549	432	376	361	367	381	395	410			
1200	500	437	391	377	387	401	415				

OnSW nameplate (GW)

OnSW + PV + Li
400 GW PV
800 GW OnSW
$321/MWh
Storage 1,460 GWh
Curtailed 1,900 TWh

$/MWh

100% Wind + PV (2021)

Amendments

CHANGE THE TITLE TO ENGINEERING SPEAK - A "Cost benefit analysis" often includes subjective measures of cost and benefits such as the social cost of carbon. The sequential strategic planning process separates the objective definition of fact from subjective choice.
Replace the title:
~~Full Costs and Benefits Analysis of Sources of Electricity Generation~~
With:
System cost analysis of alternative electricity generation technologies

Replace:
~~SECTION 1. (a) The Public Service Commission shall conduct a full costs and benefits analysis of sources of electricity generation in the State.~~
With:
SECTION 1. (a) The Public Service Commission shall conduct a system cost analysis of alternative electricity generation technologies in the State using historical data, hourly dispatch, perfect transmission (no cost, no loss), and no imports/exports. Its purpose is to provide factual options and constraints, technology proportions and generation costs, for reliable clean electricity generation technologies in the State.

Dr. Alex Pavlak; Future of Energy Initiative; www.pavlak.net; www.FutureOfEnergyInitiative.org
315 Dunham Ct., Severna Park, MD 21146; (410) 647-7334; (443) 603-3279(c); alex@pavlak.net

February 17, 2026

Replace:
~~SECTION 1. (b) (3) (I) only natural gas energy and energy storage~~;
With:
SECTION 1. (b) (3) (I) only natural gas energy, a optimal cost combination of combustion turbines and combined cycle plants, this is the baseline;

New task:
SECTION 1. (b) (3) (iv) identify the optimal cost combination of OSW, OnSW, PV, Li battery storage, and new nuclear (large). Explore the cost impact of up to 5% natural gas generation. Explore cost sensitivity using 2050 NREL/ATB cost projections. Rank the best net-zero system configuration options.

Replace:
~~SECTION 1. (b) (4) identify the costs for natural gas energy, nuclear energy, and offshore wind energy if energy storage is available to offset reliability and intermittency issues; and~~
With:
SECTION 1. (b) (4) All of the Levelized System Cost studies under SECTION 1. (b) (3) (I-iv) shall assume all new construction; unit technology costs from NREL/ATB.v2 2024 cost projections for 2024, R&D case, no subsidies; perfect transmission, no cost, no loss; closed state borders, no imports, exports to PJM; simple hourly dispatch of metered load and renewable resource data for 30 years to capture the impact of renewable energy droughts. Wind and solar production to be based on reanalyzed wind and insolation solar data filtered through turbine and PV module models.

Dr. Alex Pavlak; Future of Energy Initiative; www.pavlak.net; www.FutureOfEnergyInitiative.org
315 Dunham Ct., Severna Park, MD 21146; (410) 647-7334; (443) 603-3279(c); alex@pavlak.net

HB 674_ Fav w Amend_PSC.pdf
Uploaded by: Barve Barve
Position: FWA

STATE OF MARYLAND

PUBLIC SERVICE COMMISSION

Chair Marc Korman
Environment and Transportation Committee
250 Taylor House Office Building
Annapolis, MD 21401

RE: HB 674– Favorable with Amendments – Public Service Commission - Full Costs and Benefits Analysis of Sources of Electricity Generation

Dear Chair Korman and Committee Members:

The Public Service Commission (the Commission) provides the following comments on House Bill 674 (HB 674) for your consideration. The Commission requests a favorable report, with consideration of the amendments detailed below.

The proposed legislation requires the Commission to conduct a full costs and benefits analysis of electric generation sources in the State and utilizes a certain type of assessment called a Levelized Full System Cost of Electricity model to analyze certain scenarios. The Commission is required to report its findings by December 1, 2027, which is to include recommended policy changes to support the development of the energy sources with the lowest costs and greatest benefits to ratepayers in the State. The Commission will require consultants to conduct the study, as the Commission does not currently have the required software tools, databases, and training in this type of analysis. The Commission's Technical Staff would work with the consultants to accomplish the required assessment and analysis.

The study required in HB 674 would be beneficial to help inform State policy makers as strategies are developed to attract additional sources of generation to Maryland to help lower costs and meet state climate goals. The Commission believes amendments need to be made to the proposed legislation to be more technologically agnostic in its study parameters by including all generation types that may help serve Maryland's energy needs in the future. The generation types to be studied should include nuclear, storage, solar, wind, and natural gas. The Commission also requests that a definition of "Levelized Full System Cost of Electricity" be provided and whether other models that help inform future cost of generation should be included.

The Commission appreciates the opportunity to provide testimony on HB 674 and requests a favorable report with consideration of the amendments detailed above. Please contact the Commission's Director of Legislative Affairs, Niki Wiggins, if you have any questions.

Sincerely,

WILLIAM DONALD SCHAEFER TOWER · 6 ST. PAUL STREET · BALTIMORE, MARYLAND 21202-6806
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Kumar P. Barve
Chair, Maryland Public Service Commission

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HB 674_MDCC_Public Service Commission-Full Costs a
Uploaded by: Hannah Allen
Position: FWA

MARYLAND
Chamber of Commerce

House Bill 674

Date: February 17, 2026
Committee: Environment and Transportation
Position: Favorable with Amendments

Founded in 1968, the Maryland Chamber of Commerce (the Chamber) is the leading voice for business in Maryland. We are a statewide coalition of more than 7,000 members and federated partners, and we work to develop and promote strong public policy that ensures sustained economic growth for Maryland businesses, employees, and families.

House Bill 674 (HB 674) directs the Maryland Public Service Commission (PSC) to conduct a full costs and benefits analysis of electricity generation sources in the State and to report its findings and recommendations by December 1, 2027. The current bill identifies natural gas, nuclear, and offshore wind energy as generation types to be assessed under various scenarios and explicitly requires the use of a levelized full system cost methodology to analyze those options.

The Chamber supports the bill's goals of promoting data-driven energy policy and providing clarity on cost and reliability impacts. As Maryland pursues ambitious energy and climate goals, it is critical that policymakers and regulators have a clear understanding of how different generation resources affect ratepayers, system reliability, and long-term affordability.

HB 674 takes an important step in this direction by requiring the Commission to evaluate generation resources using a full system cost framework. This type of analysis will help inform thoughtful decision-making and provide valuable insight into the tradeoffs associated with various energy pathways, particularly as businesses and households continue to experience upward pressure on energy costs.

The Maryland Chamber believes that a thorough and inclusive analysis will strengthen the usefulness of the Commission's report and enhance its value to the General Assembly, stakeholders, and the public. With that goal in mind, **we respectfully request an amendment to include solar energy as a generation source evaluated in the analysis**. Including solar will provide policymakers with a more complete and accurate assessment of system impacts, costs, and benefits as Maryland continues to evaluate energy policies that affect ratepayers and employers across the State.

For these reasons, the Maryland Chamber of Commerce respectfully requests a **Favorable with Amendments Report** on **HB 674.**

Levelized Full System Cost of Electricity - House.

Uploaded by: Bryan Dunning

Position: UNF

Center for Progressive Reform

February 17, 2026

Testimony of Bryan Dunning
Senior Policy Analyst
Center for Progressive Reform

Before the Maryland House of Delegates Environment and Transportation Committee Requesting an Unfavorable Report on HB0674: Public Service Commission – Full Costs and Benefits Analysis of Sources of Electricity Generation

Dear Chairman Korman, Vice-Chair Guyton, and the members of the Environment and Transportation Committee,

Thank you for the opportunity to provide testimony on HB0674 on behalf of the Center for Progressive Reform. The Center is a research and advocacy organization that focuses on advancing good governance, and achieving equitable public protections. HB0674 directs the Maryland Public Service Commission (MD PSC) to conduct a study on certain generation costs of electricity in Maryland and formulate recommendations "for policy changes to support the lowest costs and greatest benefits to the ratepayers of the state."[1] While the Center is supportive of data driven analysis that provides policy recommendations to support least-cost generation for Marylanders, HB0674 will not achieve this purpose, and as such the Center respectfully requests this committee to return an **unfavorable** reading of this bill.

Traditional Cost analysis Models

There are numerous methodologies for evaluating the cost of a generation asset that are available for industry and policy makers to utilize. For example: levelized cost of electricity (LCOE) is a model used for the last three decades by both industry and policy makers[2] to determine the lifetime costs of generation produced by a given facility. Similarly, levelized avoided cost of electricity (LACE) is a well vetted tool to evaluate generation's cost and benefit to the grid, and is often used in conjunction with LCOE to evaluate whether it is economically beneficial to build

[1] HB 0674, 2026 Regular Session (MD, 2026)
[2] For instance, LCOE is heavily used by both the national renewable energy laboratory (NREL) and the energy information administration (EIA)

a generation project. While, as with all models, there are grounds for tweaks or improvements,[3] these models have been vetted, and are useful in evaluating costs because they concern themselves with what the actual conditions of the grid and generation mix a facility will be operating in.

Levelized full system cost of electricity

Levelized full system cost of electricity (LFSCOE), which this bill directs MD PSC to use as *the* modelling tool to evaluate current gas-fired and nuclear generation costs, as well as future offshore wind generation costs[4], *sounds* similar to existing, vetted, modeling tools – however, it, in both history and practice diverges substantially.

In history, LFSCOE, unlike commonly accepted models such as LCOE or LACE, was developed only in 2022 in a PhD dissertation paper, and lacks the vetting and proving of traditional modeling. It is accordingly not a sound basis for MD PSC to utilize to conduct a cost benefit analysis, especially absent conducting said analysis also using industry accepted models such a LCOE or LACE.

In practice, the model inputs for LFSCOE are broadly similar to LCOE – with one critical difference - LFSCOE makes an assumption that the generation type being analyzed is the *only* type of generation present on the grid, and as such adds to the project's lifetime cost the amount of storage required ensure firm delivery for that generation type. This has two major implications as to the model. The first is that it sharply increases the modeled cost for any generation system that is intermittent, or otherwise has a low capacity factor.[5] The second, is that outputs of the LFSCOE model are purely hypothetical.

Neither in Maryland, nor any transmission connected grid in United States, is there a market that relies on only one source of generation. Unlike traditional cost models, which concern themselves with evaluating the actual costs of generation on actual grids, LFSCOE evaluates generation under purely hypothetical market circumstances. Although this may be interesting as a thought experiment, directing MD PSC to conduct a cost study that is modeled upon a hypothetical single generation-type plus storage state grid, is, at best, not a useful exercise given the diverse generation mix in the state. At worst, it opens the door to support for misguided policy changes based on modeling assumptions that are divorced from reality.

For these reasons the Center for Progressive Reform respectfully requests an **Unfavorable** reading by this committee.

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[3] for example, standard LCOE does not include in its calculations the impact of greenhouse gas (GHG) emissions or public health impacts from pollution in its costs, which is something policy makers in Maryland should consider under the Climate Solutions Now Act of 2022's provisions related to GHG reduction and overburdened and underserved communities.

[4] The 8.5 GW of offshore wind directed by the POWER Act

[5] The amount of generation produced by a generator compared to its full generation potential over a period of time

Sincerely,
Bryan Duning
Senior Policy Analyst
Center for Progressive Reform

HB674 SEIA Testimony UNF.pdf
Uploaded by: Leah Meredith
Position: UNF

February 17, 2026

Delegate Marc Korman
Chair
House Environment & Transportation Committee
250 Taylor House Office Building
6 Bladen Street
Annapolis, MD 21401

Delegate Michele Guyton
Vice Chair
House Environment & Transportation Committee
251 Taylor House Office Building
6 Bladen Street
Annapolis, MD 21401

RE: SEIA Opposition to HB674: Public Service Commission - Full Costs and Benefits Analysis of Sources of Electricity Generation

Chair Korman, Vice Chair Guyton, and Members of the House Environment and Transportation Committee:

I am writing on behalf of the Solar Energy Industries Association (SEIA) in **opposition** to HB674 (Morgan). It was referred to the House Environment and Transportation Committee on February 2, 2026.

Founded in 1974, SEIA is the national trade association for the solar and storage industries, building a comprehensive vision for the advancement of these technologies. As the voice of the industry, SEIA works to support solar and energy storage as they become a mainstream and significant energy source by expanding markets, reducing costs, increasing reliability, removing market barriers, and providing education on the benefits and capabilities of solar and energy storage technologies. We work with our 1,200+ member companies, which include solar and storage manufacturers, service providers, residential, community and utility-scale solar developers, installers, construction firms, and investment firms, as well as other strategic partners, to shape fair market rules that promote competition and the growth of reliable, low-cost energy storage and solar power.

If enacted, HB674 would require the Maryland Public Service Commission to conduct a full costs and benefits analysis of various sources of electricity generation in the state. While not problematic on its face, HB674 would require the Commission to utilize the Levelized Full System Cost of Electricity (LFSCOE) model for this analysis. Unlike the Levelized Cost of Energy and Levelized Avoided Costs of Energy, which are well-respected analytical metrics for determining the average costs and benefits of a source of electricity generation over the lifetime of that asset, LFSCOE is a concept that originates from non-peer reviewed research that is far outside the mainstream and has no bearing on energy policy design or project development.

LFSCOE is a meaningless value that is calculated based on a single, entirely unrealistic circumstance: the cost of serving the entire electricity market with only one technology plus energy storage. There is no situation in which any electric utility, state, or Regional Transmission Organization (RTO), would ever meet its load with only one type of electricity generating technology plus energy storage. LFSCOE purports to show that solar and wind are “expensive” when considering the “full system cost” because a state like Maryland would need to dramatically overbuild wind and solar in order to provide electricity around the clock.

Because LFSCOE is calculated based on a unrealistic scenario where a single technology plus storage would replace all other types of existing electricity generation, it is entirely irrelevant to Maryland policy as the resulting cost determined by the analysis would not be experienced by any ratepayer or market participant. Maryland is in a restructured market where energy prices are set by PJM's wholesale market. These prices are based on the economic dispatch of the existing fleet, not a hypothetical functioning of an entirely fictional parallel power grid. No energy consumer would thus ever pay the "full levelized cost" of any energy asset, and no ratepayer would be forced to subsidize certain generation types at their "full levelized cost" in any circumstance.

Maryland should avoid bringing unwarranted attention to a fundamentally flawed concept. Even merely requiring the Public Service Commission to calculate the LFSCOE lends undeserved credibility to the metric and could bring negative focus against renewables as members of the public are rarely aware of nuances of power market design when faced with a splashy – but false – headline about how much certain types of electricity generation "really" cost. This approach has no merit and should not be included in any policy analysis commissioned by the state.

For these reasons, SEIA opposes this legislation and respectfully urges the Committee to issue an unfavorable report on HB674. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Leah Meredith

Leah Meredith
Mid-Atlantic Regional Director
Solar Energy Industries Association
lmeredith@seia.org

HB0674 (SB0270)- UNF - Public Service Commission -
Uploaded by: Megan Outten
Position: UNF

Maryland Energy Administration

TO: Chair Wilson, Vice Chair Crosby, and Members of the Environment & Transportation Committee

FROM: MEA

SUBJECT: HB 674 - Public Service Commission - Full Costs and Benefits Analysis of Sources of Electricity Generation

DATE: February 17, 2025

MEA Position: UNFAVORABLE

House Bill 674 mandates the Public Service Commission (PSC) to conduct a specific cost-benefit analysis of electricity generation sources in Maryland.

While comprehensive evaluations are valuable, this bill prioritizes short-term financial costs while failing to adequately consider critical factors such as environmental sustainability and public health impacts. The bill's proposed Levelized Full System Cost of Electricity (LFSCOE) model does not incorporate external costs such as carbon emissions, air quality degradation, and associated public health risks. Maryland's reliance on fossil fuels has led to increased respiratory diseases, cardiovascular conditions, and premature mortality due to pollution exposure. Additionally, the current queue for interconnection of new generation in Maryland is dominated by solar and solar plus energy storage. The mandated report fails to take these anticipated assets into account.

Maryland has made significant progress in reducing greenhouse gas emissions through policies such as the Clean Energy Jobs Act and the Climate Solutions Now Act. This bill risks undermining these efforts by using a narrow cost-analysis model that does not account for the broader benefits of renewable energy. Fossil fuel-based energy sources contribute significantly to climate change and air pollution.

Furthermore, the bill fails to acknowledge the long-term economic benefits of renewable energy investments, including job creation in the offshore wind and solar industries, reduced healthcare costs, and insulation from fossil fuel market volatility. Ignoring these factors skews the analysis in favor of short-term fossil fuel interests, delaying the transition to a sustainable energy future.

Maryland's commitment to achieving its energy and environmental goals remains a priority. HB 674 introduces unnecessary obstacles to this goal by promoting an incomplete cost evaluation that disregards the full impact of energy generation.

For these reasons, MEA urges the committee to issue an **unfavorable report.**

1800 Washington Blvd., Suite 755, Baltimore, MD 21230
(410) 537-4000 | 1-800-72-ENERGY

Our sincere thanks for your consideration of this testimony. For questions or additional information, please contact Landon Fahrig, Legislative Liaison, at landon.fahrig@maryland.gov or 410.913.1537.

SB0270 & HB0674 - OPC Testimony.pdf
Uploaded by: David Lapp
Position: INFO

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CARISSA RALBOVSKY
CHIEF OPERATING OFFICER

BILL NO.:	Senate Bill 0270/House Bill 0674 – Public Service Commission - Full Costs and Benefits Analysis of Sources of Electricity Generation
COMMITTEE:	Education, Energy, and the Environment Environment and Transportation
HEARING DATE:	February 19, 2026 (EEE) February 17, 2026 (ENT)
SPONSOR:	Senators Carozza, Brooks, Gallion, Harris, Hershey, Hester, Simonaire, Watson, and West Delegates T. Morgan and Boyce
POSITION:	Informational

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The Office of People's Counsel (OPC) respectfully provides the following informational comments on Senate Bill 0270/House Bill 0674. SB 0270/HB 0674 would require the Public Service Commission (PSC) to conduct an analysis of the costs and benefits to ratepayers of different sources of electricity generation and make recommendations for policy changes to support the development of energy sources with the lowest costs and greatest benefits.

Maryland's electricity needs have long been satisfied through participation in PJM's regional wholesale electricity markets. And Maryland's engagement in PJM's markets has, historically, allowed utility customers to benefit from importing lower-cost electricity from out of state. However, recent PJM auctions have resulted in high prices for Maryland and raised concerns about the mix of generation resources serving Maryland customers. Given these higher prices, an assessment of the costs and benefits of different sources of electricity could be beneficial.

SB 0270/HB 0674 charges the PSC with looking at the costs of the current resources serving Maryland and comparatively analyzing the costs of various sources of generation to meet Maryland's future needs. OPC is concerned that the bill as drafted does not adequately incorporate the costs and benefits of Maryland's participation in PJM's markets and all available generation technologies. A comparative study of energy costs that does not reflect Maryland's participation in regional wholesale markets may not be useful to identify policies to lower customer costs.

OPC offers the following amendments to address our immediate concerns, ensure a more robust and complete analysis, and, ultimately, lead to a more fruitful and productive discussion of state energy policy.

First, OPC has suggested amendments that would require the PSC to establish a baseline assessment of the costs to meet Maryland's energy demand over the next 15 years under the current resource mix plus anticipated offshore wind capacity, taking into account costs to address foreseeable reliability concerns and foreseeable transmission capabilities.

Second, OPC has also suggested amendments to afford the PSC more flexibility to identify resource mixes to include in the bill's required cost analysis and the ability to consider other cost models. The Levelized Full System Cost of Energy model called for in the bill, while helpful to understanding the costs of specific energy sources, may not fully account for cost savings available through participation in PJM's wholesale markets. Granting the PSC discretion to employ other models to analyze costs ensures a more complete cost assessment. The amendments further ensure that the results of the cost assessment take into account changes in forecasted demand and available energy storage resources and can be better compared to the projected costs of meeting Maryland's anticipated electricity needs under the current resource mix.

OPC appreciates the opportunity to provide these comments on SB 0270/HB 0674.

OPC proposed amendments to HB 0674/SB 0270

(a) The Public Service Commission shall conduct an analysis that projects the full costs and benefits ~~analysis~~ of sources of electricity generation serving customers in the State.

(b) The analysis shall:

(1) ~~identify~~ project the costs of electric~~ity to ratepayers~~ supply for Maryland electric utility customers in 2031, 2036, and 2041 using PJM Interconnection LLC's January 14, 2026 Load Forecast Report, assuming that the State electric~~ity~~ capacity, energy, and ancillary services markets are ~~is~~ served by the following generation mixes:

(i) natural gas energy at its current capacity;

(ii) nuclear energy at its current capacity; ~~and~~

(iii) 8,500 megawatts of offshore wind energy capacity; and

(iv) other generation or related technologies, including energy storage, available to serve customers in the State;

(2) include ~~the~~ any additional costs of ~~electricity generation~~ resources necessary to ~~offset~~ address reliability issues and ~~the~~ intermitten~~cy of offshore wind energy~~ resources;

(3) account for the capacity of the transmission system in a manner that distinguishes between

(i) existing transmission capabilities; and

(ii) new transmission capabilities resulting from transmission projects approved by the Federal Energy Regulatory Commission but not yet constructed; and

(4) use the Levelized Full System Cost of Electricity model, and any other models the Commission determines appropriate, to analyze the costs of meeting the State's electricity needs in 2031, 2036, and 2041 from:

(i) only natural gas energy and energy storage;

(ii) only nuclear energy and energy storage; ~~and~~

(iii) only offshore wind energy and energy storage; and

(iv) any other generation or storage resources or combination of resources, as determined by the Commission;

(45) assuming energy storage is available to offset reliability and intermittency issues, identify the costs for natural gas energy, nuclear energy, ~~and~~ offshore wind, and any other resources the Commission determines appropriate ~~energy if energy storage is available to offset reliability and intermittency issues~~; and

(~~5~~6) include recommended policy changes to support the development of the energy sources with the lowest costs and greatest benefits to the ratepayers of the State.

(c) On or before December 1, 2027, the Public Service Commission shall report its findings and recommendations to the Senate Committee on Education, Energy, and the Environment and the House Environment and Transportation Committee, in accordance with § 2–1257 of the State Government Article.