



## Position Statement

Unfavorable  
Environment and Transportation Committee  
2/24/2026

### **House Bill – 928 – Certificates of Public Convenience and Necessity – Transmission Lines – Applicability and Waivers**

Baltimore Gas and Electric Company (BGE) opposes **House Bill 928 - Certificates of Public Convenience and Necessity - Transmission Lines - Applicability and Waivers**. House Bill (HB) 928 substantially alters existing requirements of the established Public Service Commission (PSC) Certificate of Public Convenience and Necessity (CPCN).

HB 928 prematurely expands and modifies existing CPCN procedures without much needed engagement and input from impacted parties. The Bill raises regulatory, permitting, and timing risks since it expands CPCN requirements beyond its existing purview of overhead lines 69kV+ to include substation and underground projects. Underground transmission is a preference for customers and communities, so adding complexity and time constraints for the permitting process will make these projects more challenging. BGE is also concerned that the new waiver requirements purposed are too ambiguous. Increasing the difficulty of obtaining waivers for electric infrastructure that Maryland needs may cause serious delays in maintaining reliability and alleviating transmission congestion.

BGE respectfully requests an unfavorable report.

BGE, headquartered in Baltimore, is Maryland's largest gas and electric utility, delivering power to more than 1.3 million electric customers and more than 700,000 natural gas customers in central Maryland. The company's approximately 3,400 employees are committed to the safe and reliable delivery of gas and electricity, as well as enhanced energy management, conservation, environmental stewardship and community assistance. BGE is a subsidiary of Exelon Corporation (NYSE: EXC), the nation's largest energy delivery company.

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