

TESTIMONY BEFORE THE MARYLAND PUBLIC SERVICE COMMISSION (PSC)
WEDNESDAY, AUGUST 23, 2023
BGE'S MULTIYEAR RATE CASE (MYRC), CASE NO. 9692

The Howard County Citizens Association (HCCA) recommends that you do not approve the MYRC of \$602 million until substantial revisions are made to it. BGE is the sole provider of both gas and electricity in Howard County due to its monopoly status.

The HCCA is a 61 year old volunteer organization that represents Howard County citizens in both state and county issues by testifying on issues such as the current draft of the General Plan now under consideration by the County Council and previous attempts by state legislators to preempt the Homeowners status of the Columbia Association. HCCA has been very active in transportation electrification and in 2018 helped to get passed a County ordinance requiring one EVSE for every new 25 units built by a builder and sufficient service capacity in new single family residences for the addition of an EVSE.

Since we are a volunteer organization, we do not have the bandwidth to review the 17 individual files submitted by BGE in support of their MYRC. We will focus on just one issue that over rides the MYRC, the Climate Solutions Now Act of 2022 (CSNA) adopted by Maryland. We have known since the oughts that the path to decarbonizations depends on utilities such as BGE to facilitate the provision of Distributed Energy Resources. Since the MYRC is proposed to cover a 3 year period out out the 10 years covered by the CSNA, this MYRC should be aimed at achieving and facilitating 60% green house gas reductions by 2031.

In 2022, the PSC established a Distribution System Planning Utility Work Group (DSP) to review each utility's planning process. What was found is that planning is siloed. There is no Vision, nor Goals, nor Metrics adopted by any utility including BGE to facilitate the CSNA. A search of BGE's web site does not provide on its web site a Plan for how it intends to implement the CSNA for its customers.

File 301409_133064.pdf purports to fulfill BGE's contribution to the CSNA. What it does is for ratepayers to pay for tree planting (already being done by most counties in Maryland), BGE cost to electrify its own fleet, and BGE's cost to install roof top solar on its facilities. Really? We know that feeders and transformers may need upgrading, yet it appears that this major issue is not addressed. Where is there a Performance Incentive for facilitating private roof top solar installations on BGE's distribution system?

To summarize, send BGE back to the drawing boards on the MYRC.
Authorized by the HCCA Board of Directors