(1)

* creates fiscal, regulatory, and/or code impacts and require additional vetting. Appears the intent is to be State mandated and would have a negative impact to County revenue. Without a study, unable to determine the extent of impact. Also would likely require the State to process exemptions to the taxable assessment. If delegated to the jurisdictions, this would be an increased administrative burden.

(2)

* creates fiscal, regulatory, and/or code impacts and require additional vetting. Appears the intent is to be State mandated and would have a negative impact to County revenue. Without a study, unable to determine the extent of impact. Also would likely require the State to process exemptions to the taxable assessment. If delegated to the jurisdictions, this would be an increased administrative burden.

(3)

* creates fiscal, regulatory, and/or code impacts and require additional vetting. This isn’t clear. PILOT agreements to date are an adjustment to the real property taxes, based on the agreement. Those agreements are in place to incentivize the provision of low-income housing in large projects, to the benefit of those challenged in our community. While a PILOT for this purpose would provide an incentive to build, where is the benefit to the community? This would have a negative impact to County revenue. Without a study unable to determine the extent of impact.

(4)

* creates fiscal, regulatory, and/or code impacts and require additional vetting. This does not provide enough information, generally this is understood this would have a negative impact to County revenue. Without a study, unable to determine the extent of impact.

(5)

* supportive of this concept but Note - utilities will need additional software capabilities and time to do this
* Consider including a "connect and manage" approach as is done in parts of Europe and in ERCOT. In other words, rather than subjugating to a hard aggregate capacity limit, allow prospective distributed generators to interconnect and curtail as needed to maintain reliability. (From a PPRP consultant)

(6)

* This will be so much more effective if everyone adopts the same standard (Solar App+) If a county has already adopted a system, potentially MEA can fund an interface to allow the public facing side be SolarAPP+

(7)

* Is there a way to specify "who benefits" in a manner that protects against one project forcing others to cover their costs for no actual benefit?
* support the shift from a causer-pays fee model for interconnection upgrade fees. Note - a proposal to do this is currently before the Public Service Commission in Rulemaking Docket No. 81
* supportive of cost sharing generally, and this recommendation. Additionally, support the Secondary MCAM proposal put forward in the Phase 5 PC44 Interconnection Working Group Report. Do not support the Primary MCAM proposal put forward in the Phase 5 PC44 Interconnection Working Group Report. “Primary MCAM” does not resolve grid readiness issues and will create growing and unbalanced developer and ratepayer costs.

An effective cost sharing methodology must encourage proactive investment to mitigate congested interconnection queues, price stability for developer financing, and time bounds when hosting capacity will be recovered from subsequent developers or ratepayers. Primary MCAM does not meet these needs.

Recommend hosting capacity upgrades as an interim solution; proactive planning combined with straightforward, transparent, and stable cost-allocation will best enable Maryland to meet its clean energy and climate goals.

* Would this incentive projects in areas that are very expense for interconnection?
* PSC is working on this. It seems to have widespread stakeholder support.

(8)

* This undermines HB1188 <https://mgaleg.maryland.gov/2023RS/bills/hb/hb1188e.pdf>
* What is meant by 'remove requirement'?
* As written here this proposal will have no impact on any projects that collocate. If anything it would further confuse the issue and uncertainty, as we have seen, is an overall negative in the marketplace. The reason collocation is done for projects on the same parcel is to be in compliance with the 2MW-AC NEM cap. This proposal would not eliminate the reason why projects are collocated and so therefore all projects that fit this model would continue to collocate.

The proposal that would truly help out companies that focus on net metered projects would be to raise the net meter cap from 2MW-AC to 5MW-AC. Since this is the community solar cap as well, it would be the most defensible change. Further limiting a project’s ability to step up to the 5MW-AC cap to only those serving government/non-profit users would be acceptable as well, if there is concern about opening the larger NEM projects to anyone. We think this would be consistent with the community solar requirement to sell certain percentages to low-income customers to qualify for the larger eligible project size.

This would make no changes to CPCN thresholds. A NEM/ANEM project seeking to build over 2MW-AC would need to seek approval form the PSC, not the local jurisdiction.

* Do not support this. Any solar array that is greater than 2 MW-ac (5MW-ac for community solar projects) needs a CPCN. The co-locating option in #6 was provided for solar projects to get them out of doing a CPCN. If they are not willing to agree to these requirements then they should go through a CPCN process.

How is a 10 MW project different than 5 2 MW projects that are collocated? The separate metering and the individual shutdowns make them different. I would leave the requirement in and remove #6.

(9)

* supports this proposal as meter collar adapters are likely to reduce the cost of installing rooftop solar or EV chargers. Note - a proposal to do this is currently before the Public Service Commission in Rulemaking Docket No. 81.

(10)

* We probably need to know the ratepayer effect for raising the cap to future increased levels before we approve this.
* Given that substantial amounts of NEM capacity are currently available, a proposal to raise the NEM capacity cap may be premature. Paradoxically, raising the cap at this time could actually reduce the urgency for developers to construct solar facilities expeditiously, which runs counter to the solar task force's objectives. In addition, the cost recovery of NEM credits on non-participating customers has not been fully evaluated at this point. Until that impact can be ascertained and analyzed, concerned about including this proposal in the final report.
* The 3000 MW cap is not even close to being met

(11)

* Concur. A project isn't a Community Solar project until the interconnection agreement is initialed and application is made for Community Solar capacity. The name of the subscriber organization (or even if it is a community solar subscriber organization probably isn't relevant until capacity is requested from the utility company.

(12)

* What is the objective?
* Is something required for any other industry? If so, we need to point to the study so we understand what it is.
* Is this another example of a double standard for solar? Solar development is one area where low- and moderate-income participation is a specific objective – including specification of a 40% LMI carve-out for Community Solar, the legislative designation of incentives and substantial funding (e.g., SACP funds) for low-income solar development.

Do we require “Disparity Study Analysis” for the supermarket industry, recognizing that many low-income areas are effectively food deserts?

I suggest that we take a step back before creating requirements for solar – a relatively benign and socially positive area of development – that are more onerous than other forms of development that often lack social and environmental benefits.

* If we do this we should ensure that the study is scientifically acceptable (statistically sound) and does not just stop at disparity but identifies root causes. Without knowing the root causes the State can not effectively address the problem.

(13)

* This will get us what we need even if/when the federal government removes them from requirement.

(14)(a)

* More analysis / understanding of a PLA is needed. PLAs are a rather loaded term. Rather than require it, could the State (in consultation with the solar industry & contractors) create a set of standards? Once created, then the decision can be made if it should be enacted. Also, want to ensure fair treatment for union & non union labor forces.
* Project Labor Agreements (PLAs) bestow significant benefits to organized labor (unions) in regards to guaranteed work and finances at the expense of merit shop (non-union) contractors. In essence, a PLA guarantees a percentage of every worker's hourly rate be paid to support union apprentice programs, health care, and pension plans. The inclusion of a PLA, or an indistinguishably related community benefit agreement (CBA), in the Task Force to Study Solar Incentives is premature because as a task force we do not know the following:
  + How the additional contributions for a non-union Maryland worker whose firm already provide these benefits help their families
  + Thus, should the task force be willing to exempt non-union workers from these deductions to ensure they are not double paying?
  + How many Maryland based Union signatory firms have experience working on large scale public solar projects. A list by craft could also prove helpful.
  + Have other states adopted a PLA/CBA approach to their solar projects? If so, what are the standard union hiring hall rules for the crafts required on a those projects?
  + We have not learned of any Maryland based union contractors who have worked on solar projects of significant scale with examples of what the those projects were.
  + PLAs typically work to the disadvantage of minority business enterprises (MBEs). The task force should know what Maryland-based MBE union signatory firms who have worked on Solar projects of significant scale exist.
  + Furthermore, having knowledge of the rosters by craft of the percentage of women and black skilled Maryland workers who are union members would be very helpful in making this determination.
  + With construction firms and jobs currently in high demand, we should have a sense of what Maryland crafts qualified to work on this project have Maryland workers who are on the bench looking for work. Otherwise, where would workers come from to fill a Union Hall if Marylanders are not on the bench?
  + Finally, what guarantees in return for a blanket PLA would Unions provide to ensure Maryland black and women skilled workers ( not just laborers) would be provided work opportunities? Should the task force guarantee a percentage threshold on jobs.
  + In addition and in return for a PLA, what percentage of Maryland based workers and firms could the Union guarantee on these projects?

With all these questions still unanswered, I reiterate that the inclusion of a PLA/CBA is premature. Policies that divide and exclude stakeholders should be rejected. Further, proposals that enrich one segment of the construction industry at the expense of others in return for uncodified promises should not be advanced.

(14)(b)

* Community benefits needs to be more defined
* If this something other industries do? Would need to understand what this entails so the industry can respond more accurately. Also, this would need more analysis with Labor (union & non union) along with job training organizations to uderstand how to deliver local workforce developments. The recommendation should be to consider this further, but not require it.

(15)

* This is something they would get from the utilities and not account for value of solar/DER, etc?
* There would need to be very strong controls and oversight here- for example, in Maine net metering was unfairly blamed for an increase in costs that was due (in a large part) to inflation / increase in energy supply costs. Without oversight, costs not related to solar will be included and the analysis will be flawed. Need to ensure the analysis is 'accurate' and represents just the cost impact from the specific energy incentive. Also, unclear on how DLS will actually be able to accomplish this both accurately & efficiently.
* This suggestion is only meaningful if the analysis were to be done including cost-benefit determination that includes the value-added of solar in terms of carbon reduction, health benefit from avoidance of other atmospheric pollutants, and value added to the electricity system. The appropriate basis for such calculation will be the output of the PSC’s ongoing proceeding to develop a unified cost-benefit analysis for distributed energy resources.

We note, however, that there are already partial bases for including the value of solar – including the Boden Administration’s interim assignment of the social benefit of carbon reduction at $51.00 per ton and the PSC’s own 2018 study of the value added of solar (The “Daymark Study”) – noting also that state agencies are still NOT applying any of these value added inputs in their program and rate approval processes.

* supports this proposal as it raises awareness of the impact of future proposals as legislation is considered. Note - ratepayer funding is a regressive method of funding public policy initiatives

(16)(a)

* The Solar Task Force, as it exists, likely includes stakeholders that are not as deeply involved in RPS / ACP and may not need to be involved in specific RPS conversations.
* Option A is the better avenue for the Study - as part of the study & recommendations of the MEA, they can consider concepts like the one proposed here.
* Agree
* we encourage the inclusion of a market study that provides regulators and policymakers with additional information on consumer behavior in any study of the RPS
* recommend that utilities be added as an official member of the task force should the work of the task force be extended.

(16)(b)

* This option is not a study, as it would change how SREC prices are set going forward. It is 2024 RPS reform from a market-based SREC price into an administratively-determined SREC incentive program. As such, it should be clarified as a separate option under RPS reform.
* This option assumes that SREC rates should be set by some body for some period of time. If this is the case then the SREC simply becomes an incentive policy of the state using ratepayer funding. It removes the free market from the equation. The use of long-term contracts would remove much of the variability that is causing this proposal without removing the SREC as a market mechanism. I am against having a state agency set SREC rates.
* The PSC should not be made responsible for the financial health of a specific industry.

(17)

* The Task Force did not have enough time to deliberate on the specifics of the multiplier but believe we all agree some bridge is needed. So we recommend proposing the basic structure for the legislature to determine the best format for the multiplier bridge.
* any changes to or “resets” of the state RPS be tabled for consideration by a potential RPS working group/study as part of a larger RPS overhaul.
* concerned about the rate impact of the proposals to raise the ACP. Utility rates are a regressive method of funding projects intended to benefit the public generally (such as the development of renewable energy resources). While some level of ratepayer funding will be necessary for Maryland to switch to cleaner energy generation, would like to see other sources of funding be utilized in achieving these goals

(17)(a)

* many of the 'specifics' outlined should be figured out in the legislative process post recommendation.
* This approach seems to have some potential flaws:
  + The way “multipliers” and adders” are used in other states like NJ and MA is not based on volume of solar capacity, but instead is used to direct solar projects to preferred sites, like LMI homes or communities, degraded land, parking canopies, etc.
  + The approach includes annual “block” limits on multiplier allocation combined with a 3-year window between allocation of a multiplier for a project and requirement for Interconnection. This would replicate the fundamental flaw of NY’s “Megawatt Block” program, which allowed a set total of project capacity to sign up and be allocated part of a total block of potential grants, before the projects were “shovel-ready.” The result was that a large share of the funding was allocated to projects that were rushed into the queue and were never developed, leaving limited resources to support actual projects, as they were supposed to. The remedy is to make sure that only projects that are “shovel ready” – which probably means already having site control, permits, and interconnection approval – are included as projects slated to receive the multiplier.
* PJM is the SREC issuing authority. Is PJM set up for issuing multiples of SRECs? This separates the match between the number of SRECs and the amount of solar energy being produced.
* Under today's ACP levels, this would allow residential and small commercial projects to have effective SREC levels of $120 / MWH moving down to $45 / MWH in 2030. Larger ground mounted arrays would reduce from a current effective $90 / MWH down to $33.75 / MWH in 2030, whereas industrial scale arrays (and community solar over 2 MW) would remain at the current $60 / MWH, reducing to $22.50 / MWH in 2030. This would help smaller project in the near term. It would also reduce the amount of funding coming into the SEIF for Solar ACP payments. As the multiplier is only for NEW projects, and the large amount of solar installations required per year to keep up with the RPS goals, it is unlikely that the multipliers would ever put us into a surplus, but if they did, they would crash the price of SRECs.

(17)(a)(i)

* Would this be for only new projects or all (retroactive?) Not sure why this is needed.

(17)(a)(ii)

* SREC price caps would only occur within the segment that was built faster than the preconceived goal.

(17)(a)(iv)

* 5 years not 15 years is better to incentivize new solar projects.

(17)(b)

* many of the 'specifics' outlined should be figured out in the legislative process post recommendation.

(17)(b)(iv)

* What constitutes community owned? Local government owned? Community solar using PPAs would not qualify as it is not community owned. There are almost no "community owned" community solar arrays in Maryland.

(17)(c)

* Support this option
* many of the 'specifics' outlined should be figured out in the legislative process post recommendation.

(17)(d)

* It’s important to consider that, unless other substantial financial incentives are also provided, the residential solar industry has found the present $60.00 SACP level to be insufficient to stimulate an increase in solar uptake.
* As a stopgap measure I like this. It also has a legitimate reason for doing it. Unfortunately, it doesn't solve the real problem, that Solar ACP rates are too low, but this is a good start.

(18)(a)

* agree

(18)(c)

* support this option
* Eliminating the residential clean energy rebate program would remove existing and proven infrastructure of conveying state funds toward single-family rooftop solar.

(18)(d)

* would present significant administrative hurdles that should be a considering factor by the task force.

(19)

* support reasonable consumer protection requirements for all ownership types receiving a grant for single-family residential solar projects.

(20)

* recommends that any changes to existing or the creation of new storage incentives be shifted to the Energy Storage Working Group, which is currently holding meetings.

(21)

* The sentiment is good, but I believe that EUSP funding available for energy assistance to low-income families has been declining; and we know that EUSP energy assistance serves only a minority share of households who would qualify for that assistance. So taking money away from energy assistance is NOT a good idea as a way to promote low-income solar.

(23)

* recommends that any changes to existing or the creation of new storage incentives be shifted to the Energy Storage Working Group, which is currently holding meetings.
* This would be a good system if Maryland were to authorize a ConnectedSolutions type tariff.

(24)

* RPS reform is a highly complex and significant undertaking which could bring instability to the solar industry if done rashly and without proper considerations of suggested proposals. Recommend shelving all changes to the state RPS until proper time and attention can be given to the issue.

(25)

* it is not wise to put funding distributions in law or regulation. MEA is the best judge of funding distribution based on opportunity and needed. MEA needs the flexibility.

(25)(a)

* By providing only 2 options you close off any third options. If the funding is limited to LMIOU (as it currently is), MEA will adjust the percentages on a yearly basis based on the number of good applications. In addition, MEA should be allowed to use sound management practices to develop a sustainably funded program that doesn't develop peaks and valleys in funding.

(25)(b)

* too narrow to actually be able to use all this money. The specifics should be figured out post recommendation in the legislative process and not totally defined here.
* Support this option. MEA (with the solar industry) could provide a new desired Solar ACP price for the near term future (10 years).

(26)(b)

* don’t support this recommendation, if the definition of low-income is at or below 200% of federal poverty.
* There needs to be a plan for the money to be used in case not all of it is allocated.

(27)

* This should not be phrased as an Option A versus Option B thing, as both items can both be recommended. Also, seems that Option B is setbacks only, so ultimately is included as part of Option A.

(27)(a)

* PSC should lead
* Either option is an infringement on county rights. You need to give the counties a judicial/administrative ability to challenge a decision.

(27)(b)

* Either option is an infringement on county rights. You need to give the counties a judicial/administrative ability to challenge a decision.
* First of all, the PSC already does this. Second "reasonable" is highly subjective. Recommend removing the work "reasonable" and the sentence works just as well.

(27)(b)(ii)

* State has no experience with setbacks on these small projects.

(28)

* Should not be Option A versus Option B, as the two things here can be enacted jointly- can do both options. Option B should be its own recommendation.

(28)(a)

* The CPCN process has never been the reason why these projects are not constructed
* Each Solar Project has unique impacts that must be addressed.

(28)(b)

* Only allow an expediated review if there is no County or local opposition and the developer agrees to a Community Benefits Agreement or similar program that benefits the local community/County.

(29)

* This recommendation would be stronger if it was a percentage of all lands rather than just ag land. Some counties do not have much ag land but lots of other solar friendly land. It also has the major ag counties bearing more of the burden than the more energy intensive user areas. Finally some counites my have already passed this threshold with the exisitng solar development.
* A hard goal for each county would be difficult unless there is some sort of trading program.
* Why MEA? Why not Planning? Or MDA? Or MDE?
* This statement assumes that there SHOULD be an "equitable" sharing of solar on agricultural zoned land. Somehow this would require a county to entice/force farmers (who may not want solar on their land) to put solar on their land. Sounds a bit like "eminent domain". Some counties have better properties for solar (i.e. flat land, less snow, less clouds).

It also assumes that there is a transmission or distribution infrastructure available in all counties to carry off all of the electrical power being generated.

I understand the concern behind this proposal, but believe forcing it upon the counties is not in the public interest.

(30)

* This one needs to be explained more. New commercial projects will be built in accordance with current standards and codes. A county may have every reason to impose additional requirements on a project that was built using aluminum wiring, 208 volts, and switchboards that do not meet current standards of safety. Without an example of a county plan that is egregious, it's hard to understand this proposal.

(31)

* If these are not right, we are happy to convene a process by which the industry coordinates with other organizations & interests to come up with something. We can also consider a Land Maintenance Agreement (LMA), which is something IL has, and was the result of this type of coordination.
* concerned that we are developing a double standard for solar, which – unlike residential and commercial development – does NOT require new roads, sewers, or schools, does not generate new traffic and the associated pollution, DOES provide additional revenue to jurisdictions, and DOES have quantifiable value-added (which will be more specifically quantified by the PSC’s ongoing Cost-Benefit Analysis proceeding) to both the climate and the electricity supply.

We should therefore review the following list keeping in mind the intent of item 15 – to avoid creating a double standard and more burdensome requirements for solar than for other regulated development.

(31)(b)

* Require instead of consider. Effective run of and pollution reduction is important and should be required not considered

(31)(d)

* Needs to reference a document or rules. What is "green infrastructure" as related to stormwater management?

(31)(g)

* This essentially requires all arrays to be constructed for agrivoltaics. What does that say for minimum array height, line spacing, strength of poles, wire runs, etc. I'm not sure this should be a requirement as written. A requirement must have some standard to meet, and this is very vague.

(31)(j)

* I think they are requiring environmental reviews to be made subject to public review, but the sentence needs to be rewritten to make this clear. If not, then who are these reports being "provided to"?

(31)(k)

* why ¼ of a mile? How was this determined?
* At what point in the process is this required and what is the purpose of the public meeting? Is it just to provide notice, or is it also to gain input. The timing of each would be very different.

(31)(i)

* What constitutes additional outreach and consultation?

(32)

* Delegated to the County and appears to be working very well.

(33)

* ombudsman idea is of particular interest. We envision a new Competitive Markets Division at the Public Service Commission that shepherds programs like community solar, deployment of distributed renewable generation, battery storage, etc. This new Division would be a perfect place for this ombudsman to reside. Respectfully, we believe we should expand education efforts to ensure consumers are provided the information they need to understand what they are purchasing. The Public Service Commission’s efforts in this regard should be strengthened and this recommendation is a strong step in the right direction.
* This is not a good use of either MEA or the PSC to mediate at a county level. MEA does not get involved in issues of permitting. It would be a state agency taking over a local AHJ function.