



POLITICS OF POWER

Gas and Electric Utilities'
Political Spending in Maryland

Maryland PIRG
Foundation

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Written by:

Emily Scarr, Maryland PIRG Foundation
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Introduction

GAS AND ELECTRIC UTILITIES distribute energy to Maryland homes under a state-granted monopoly. These companies are able to pass costs on to energy consumers without fear of losing business to competitors.

For investor-owned utilities, this means stable, consistent return on investment. In return for this advantage, regulated utilities have an obligation to serve the public good by providing safe, affordable, and reliable utility service.

Because they have no market competition for the distribution of energy to our homes, utilities are regulated by the state, with the legislature and the Maryland Public Service Commission overseeing the companies' operations and approving the costs they charge their ratepayers as well as the authorized rates of return on their investments. This places our utilities in a unique position in which the state has direct control over how much profit they are authorized to deliver to their shareholders. This dynamic makes utilities' political dealings more vulnerable to corruption or the perception of corruption in the public's eye. It's therefore of utmost importance that utility activities designed to influence the actions of decision-makers and public opinion happen with clear guidelines and with robust transparency in the decision-making and ratemaking process.

Our utilities are at a time of transformation in Maryland and across the country. As the state navigates the transition off of fossil-fueled home heating towards highly efficient electric alternatives powered by renewable energy, our gas utilities are facing the potential of partial or

full retirement and our electric utilities will need to adapt over time to manage the adoption of renewable energy resources and the increasing electrification of transportation and homes.

We need our utilities to focus on their core mission of providing the public good with reliable power. When our decision-makers debate public policies that impact our utilities, we need utilities at the table to share their expertise and opinions on how best to meet their charter obligations. However, in addition to providing this input, our investor-owned utilities may also be engaging in lobbying and other activities meant to influence policymakers and public opinion in ways that serve their bottom line, sometimes at the expense of the public interest. It's not always easy for decision-makers or the public to navigate these dynamics. Regulators, like those at the Maryland Public Service Commission, have expertise in these issues and a focus on overseeing regulated utilities. Legislators are less likely to have such a level of expertise, but deal with policies impacting utility regulation as part of the many bills that cross their desks every year.

This white paper takes a look at the scale of direct lobbying by regulated utilities, as well as other activities that can be reasonably categorized as intended to shift public opinion and influence decision-makers. By understanding what kinds of activities regulated utilities engage in to directly influence policy or shape public opinion, Marylanders, regulators, and decision-makers can arm themselves with the facts that will allow them to hold regulated utilities accountable for staying focused on the public good.

Understanding Regulated Utilities in Maryland

THERE ARE FOUR MAJOR ELECTRIC UTILITIES which supply electricity to Maryland homes, as well as a set of electric cooperatives and municipal electric utilities. In addition, there are three major gas utilities, as well as smaller, for-profit and municipal gas providers. All of these utilities are regulated by the Maryland Public Service Commission.

Three of the four largest electric utilities and the largest gas utility are subsidiaries of the Exelon

Corporation—Baltimore Gas & Electric (BGE), Delmarva Power & Light, and Potomac Electric Power Company (PEPCO). The Exelon Corporation is a publicly-traded holding company with nearly \$20 billion in annual revenue and more than 10 million customers.^[1] Its subsidiary BGE is Maryland's largest regulated electric and gas utility, and had revenues of nearly \$3.9 billion and net income of \$380 million in 2022.^[2]

Lobbying

ACCORDING TO AVAILABLE FINANCIAL DISCLOSURE FILINGS, Maryland’s regulated utilities were active in lobbying members of the Maryland General Assembly during the most recently completed lobbying year.

Utilities spent significant amounts on lobbying, particularly relating to energy, the environment, decarbonization, decommissioning of power plants, and the implementation of the Climate Solutions Now act, Maryland’s landmark climate transition legislation.

TABLE 1. TOTAL POLITICAL SPENDING BY UTILITY 2023

Utility	Total Spending – Lobbying (2022-2023) ^[3]
Potomac Electric Power Company (Pepco)*	\$647,813
Baltimore Gas & Electric*	\$443,983
Washington Gas Light	\$359,505
Choptank Electric Cooperative**	\$257,694
First Energy, Inc. (Potomac Edison)	\$236,680
Chesapeake Utilities	\$96,200
Columbia Gas of Maryland	\$68,860
Easton Utilities	\$60,000
Exelon*	\$22,600
Southern Maryland Electric Cooperative (SMECO)**	\$10,896
Delmarva Power & Light*	\$0
Total Spending (2022-2023)	\$2,204,231

Amounts spent on lobbying in the most recently completed lobbying year (November 2022 – October 2023).

** Exelon and subsidiaries*

*** These utilities are customer owned cooperatives, without private shareholders.*

According to activity reports, top spenders Baltimore Gas & Electric and Pepco, which are both subsidiaries of Exelon Corporation, engaged on more than 50 bills during the 2023 legislative session. Utilities may seek to influence legislation in a number of ways. Lobbyists for regulated utilities may try to influence legislators’ thinking on bills perceived to be contrary to shareholders’ interests prior to filing. In these cases, there may

be no public record of a utilities’ position on a bill. However, in some cases, utilities will go on record seeking amendments to a bill, or outright opposing a bill and seeking to prevent the bill from moving out of a committee.

During the 2023 legislative session, notable bills that regulated utilities engaged on included:

- Maryland Sustainable Buildings Act
- Electric vehicles
- Combined reporting (corporate income taxes)
- Net metering (allows for customers who generate renewable energy, for example, from rooftop solar PV systems, to be compensated by utilities for excess generation))
- Community clean energy equipment
- Energy Efficiency and Conservation Programs
- Clean Trucks Act
- Enforcement of prevailing wage on investor-owned utility projects
- Promoting Offshore Wind Energy Resources Act
- Electric Vehicle Charging Reliability Act
- Community Solar Energy Systems Program and Property Taxes
- Maryland Energy Storage Program
- Electric power reliability standards
- Full list in Appendix B.

Looking at the current disclosure period, which includes the 2024 Maryland General Assembly session, regulated utilities will again be well-represented and active on a wide array of issues.

TABLE 2. LOBBYIST REGISTRATIONS BY UTILITY 2024

Utility	Individual Lobbyist Registrations* ^[4]	Subject Matter
Baltimore Gas & Electric	22	Energy, Environment, Utility Registration, Business Regulation and Occupations, Workers' Compensation
PEPCO	22	Energy, Utilities, Electricity Regulation, Environment
Washington Gas**	8	Natural Resources – Generally, Energy, Environment, Energy, Taxes
Choptank Electric Cooperative	5	Energy, Environment, Utility Registration
FirstEnergy (Potomac Edison)	4	Energy
Southern Maryland Electric Cooperative (SMECO)	3	Utility Registration, Energy, Environment, State Government – Regulation and Procedures
Chesapeake Utilities	3	Utility Registration, Energy, Environment, Agriculture
Columbia Gas of Maryland	2	Utility registration, energy, environment, climate change
Delmarva Power & Light	1	Energy, public utilities
Easton Utilities	1	Energy
Total Individual Lobbyists	71	

*Registrations at date of publication

**Washington Gas Light Company appears as both “Washington Gas” and “Washington Gas Light” in the MSEC database.

Advertising Expenses and Trade Association Dues

REGULATED UTILITIES sometimes engage in advertising, communications, and other spending that does not directly lobby elected and other government officials, but instead seeks to sway public opinion on a relevant issue. Some of these expenditures may be classified as “grassroots lobbying” expenditures under the Maryland Public Ethics Law when they seek to influence public opinion about a specific piece of legislation.

Regulated utilities also disclose some of their advertising expenditures in the annual reports they file with the Maryland Public Service Commission, as well as in disclosures they file with the Federal Energy Regulatory Commission (FERC). Expenditures on advertising required to deliver energy to customers can be recovered through rates, whereas promotional advertising and political advertising should not. The law on this, however, is somewhat murky.

TABLE 3. ADVERTISING AND TRADE ASSOCIATION EXPENDITURES 2022

Company	Reporting Year	General Advertising	Trade Association Dues
BGE	2022	\$1,744,923 ^[5]	\$830,075 ^[6]
Delmarva Power	2022	\$586,529 ^[7]	Not disclosed
SMECO	2022	\$434,495 ^[8]	Not disclosed
PEPCO	2022	\$1,404,879 ^[9]	\$500,000 ^[10]
Columbia Gas	2022	\$43,707 ^[11]	Not disclosed
Total		\$4,214,533	\$1,330,075

Disclosed advertising expenditures for the reporting year 2022

While the specific advertising activities undertaken are not disclosed in public filings with the PSC, evidence of these activities is hard to miss. As one example, BGE recently ran sponsored content in the Baltimore Business Journal in support of its recent multi-year rate case filing at the Maryland Public Service Commission. In the [sponsored content piece](#), as at the PSC, BGE argued that new gas

infrastructure should be part of an “integrated approach” to climate transition—a cost that would fall to Maryland consumers. Similarly, BGE has purchased at least six pieces of sponsored content in the Baltimore Banner, including a [version](#) of the same piece it ran in the Baltimore Business Journal, and a related piece [charging](#) that “loud and unaccountable voices claim that natural gas has no role in Maryland’s energy future.”

Conclusion

THE REGULATED UTILITY MONOPOLY has long been a feature of the American energy landscape and has proven to be a successful means of providing for the public good of reliable, safe, and affordable utility service. As with all such partnerships, transparency and vigilant regulation are of paramount importance to protect the public interest.

As Maryland tackles perhaps its most defining energy challenge since the establishment of the industry in the form of a clean energy transition, this responsibility will be more crucial than ever.

Appendices

Appendix A: Utilities in Maryland

TABLE A-1. ELECTRIC UTILITIES

Utility	Owner	Customers	Geographic Area
Baltimore Gas and Electric (BGE)	Exelon Corp.	1.3 million (electric) ^[12]	Central Maryland
Potomac Electric Power Company (PEPCO)	Exelon Corp.	596,000 (MD and DC) ^[13]	Washington, D.C. and suburbs
Potomac Edison Company	First Energy	285,000 ^[14]	Western Maryland – Allegany, Washington, Frederick counties, and portions of Carroll, Howard, and Montgomery Counties
Delmarva Power	Exelon Corp.	210,000 ^[15]	Delmarva Peninsula/Maryland Eastern Shore
Southern Maryland Electric Cooperative (SMECO)	Member owned co-op	174,000 ^[16]	Southern Maryland – Calvert, Charles, and St. Mary’s counties
Choptank Electric Cooperative	Member owned co-op	56,000 ^[17]	Maryland’s Eastern Shore
A&N Electric Cooperative	Member owned co-op	35,000 in VA and MD combined ^[18]	Smith Island, Maryland
City of Hagerstown Light Department	Municipal owned	17,500 ^[19]	Hagerstown, MD
Easton Utilities Commission	Member owned co-op	11,000 (Electric) ^[20]	Easton, MD
Somerset Rural Electric Cooperative	Member owned co-op	Not disclosed	Garrett County, MD
Thurmont Municipal Light Company	Municipal owned	Not disclosed	Thurmont, MD
Town of Williamsport Utilities	Municipal owned	Not disclosed	Williamsport, MD
Town of Berlin Electric	Municipal owned	Not disclosed	Berlin, Maryland

TABLE A-2. GAS UTILITIES

Utility	Owner	Customers	Geographic Area
Baltimore Gas and Electric (BGE)	Exelon Corp.	1.3 million (electric) ^[21]	Central Maryland
Potomac Electric Power Company (PEPCO)	Exelon Corp.	596,000 (MD and DC) ^[22]	Washington, D.C. and suburbs
Potomac Edison Company	First Energy	285,000 ^[23]	Western Maryland – Allegany, Washington, Frederick counties, and portions of Carroll, Howard, and Montgomery Counties
Delmarva Power	Exelon Corp.	210,000 ^[24]	Delmarva Peninsula/Maryland Eastern Shore
Southern Maryland Electric Cooperative (SMECO)	Member owned co-op	174,000 ^[25]	Southern Maryland – Calvert, Charles, and St. Mary’s counties
Choptank Electric Cooperative	Member owned co-op	56,000 ^[26]	Maryland’s Eastern Shore
A&N Electric Cooperative	Member owned co-op	35,000 in VA and MD combined ^[27]	Smith Island, Maryland
City of Hagerstown Light Department	Municipal owned	17,500 ^[28]	Hagerstown, MD

Appendix B: Lobbying Activity

TABLE B-1. 2023 STATE LEGISLATION REPORTED IN LOBBYING DISCLOSURES

KEY

BGE = Baltimore Gas & Electric Company
 CG = Columbia Gas of Maryland
 CUC = Chesapeake Utilities Corporation
 EU = Easton Utilities Commission
 PE = Potomac Edison/First Energy
 PEPSCO = Potomac Electric Power Company
 WGL = Washington Gas & Light

Chamber/Bill No.	Subject or Title	Utilities Engaging
HB6	Maryland Sustainable Buildings Act of 2023	BGE
HB7	Electric Vehicle Recharging Equipment Rebate Program - Renewal	BGE
HB33	Commercial Law - Consumer Protection - Biometric Data Privacy	BGE
HB39	Corporate Income Tax Returns of Publicly Traded Corporations - Reporting Requirement	BGE, PE
HB46	Corporate Income Tax - Combined Reporting	PE
HB61	Utility Contractors - Employment and Licensure - Requirements and Application	BGE, PEPSCO, CG
HB62	Land Use - Public Service Companies - Pollinator Friendly Vegetation Management and Utility Designated Pollinator Areas	BGE, PEPSCO, PE, CG
HB68	Net Metering Flexibility Act	BGE, PEPSCO, CEC, PE, EU
HB101	Condominiums - Common Elements - Clean Energy Equipment	BGE, PEPSCO
HB111	Maryland Medical Assistance Program, Maryland Children's Health Program, and Workgroup on Low-Income Utility Assistance	BGE
HB146	Howard County - Alcoholic Beverages - Public Hearing Ho. Co. 13-23	PEPSCO
HB149	Maryland Electricians Act - Revisions	BGE
HB169	Public Utilities - Energy Efficiency and Conservation	BGE, PEPSCO

	Programs - Energy Performance Targets and Low-Income Housing	
HB230	Clean Trucks Act of 2023	BGE, PEPCO
HB323	Social Services Programs - Eligibility and Enrollment	BGE, PEPCO, CG
HB347	Attorney General - Climate Change Actions - Authorization	WGL
HB408	Alcohol and Tobacco Commission - Industry to Consumer Cannabis Legalization Awareness Program and Tax Credit	CEC
HB442	Income Tax - Subtraction Modification - Qualified Broadband Grants	EU
HB459	County and Municipal Street Lighting Investment Act	BGE, PEPCO, PE
HB511	Renewable Energy Portfolio Standard - Solar Energy - Compliance Fees	BGE, PEPCO, PE, CG
HB513	Investor-Owned Utilities - Prevailing Wage - Enforcement	BGE, CUC, CG
HB550	Clean Transportation and Energy Act	PEPCO
HB551	Office of Statewide Broadband - Study of Broadband Expansion Incentives	CEC, EU
HB556	Cannabis Reform	CG
HB630	Utility Account Holders - Victims of Abuse - Protections	BGE, PEPCO, CG
HB678	Sales and Use Tax - Electricity for Agricultural Purposes - Study and Report	CEC, PE
HB692	Public Service Commission - Certificates of Public Convenience and Necessity - Local Permits	BGE, PEPCO, EU
HB718	Reclaim Renewable Energy Act of 2023	PEPCO, CUC
HB793	Promoting Offshore Wind Energy Resources Act	BGE
HB834	Electric Vehicle Charging Reliability Act	BGE, PEPCO, PE
HB839	Maryland Resilient and Clean Energy Homes Act	BGE, PEPCO, PE
HB840	Climate, Labor, and Environment Equity Act of 2023	PEPCO
HB847	Anaerobic Digestion Workgroup	CUC
HB891	PSC Study Act of 2023	BGE, PEPCO, EU
HB904	Energy Savings Act	BGE, PEPCO, WGL, CG
HB908	Electricity - Community Solar Energy Generating Systems Program and Property Taxes	BGE, PEPCO, PE

HB910	Energy Storage - Targets and Maryland Energy Storage Program - Establishment	BGE, PEPCO, PE
HB969	Critical Infrastructure and Cybersecurity Act of 2023	BGE, PEPCO, PE, EU
HB988	Family and Medical Leave Insurance Program - Modifications	BGE
HB992	Maryland Strategic Energy Investment Fund - Compliance Fees for Solar Energy Shortfalls - Uses	PEPCO
HB1035	Energy Efficiency Conservation Plans and Green and Healthy Task Force	BGE, PEPCO, WGL, PE, CUC, CG
HB1046	Public Safety - Stationary Energy Storage Systems	PEPCO
HB1099	Electricity - Solar Energy Generating Stations - Fire Suppression	PEPCO
HB1100	Battery Storage and Solar Arrays Safety Training Grant Program and Fund	PEPCO
HB1103	Electric Companies - Reliability Standards	BGE, PE
HB1134	Maryland Building Performance Standards - Fossil Fuel Use and Electric-Ready Standards	PEPCO, WGL, CUC, CG
HB1186	Public Service Companies - Annual Report on Votes Cast at Meetings of Regional Transmission Organizations	BGE, PEPCO, PE
HB1188	Public Utilities - Certificate of Public Convenience and Necessity and Meter Aggregation	BGE, PE, EU
HB1239	Maryland Strategic Energy Investment Program - Tier 1 Renewable Sources, Solar Energy Systems, and Alterations	PEPCO
HB1267	Promise Schools - Establishment	CEC
SB44	Maryland Electricians Act - Revisions	BGE
SB62	Land Use - Public Service Companies - Pollinator Friendly Vegetation Management and Utility-Designated Pollinator Areas	BGE, PEPCO, PE, CG
SB81	Fight for Fifteen Acceleration Act of 2023	BGE
SB90	Stop the Spam Calls Act of 2023	BGE
SB92	Maryland Sustainable Buildings Act of 2023	BGE
SB143	Net Metering Flexibility Act	BGE, PEPCO, CEC, PE, EU
SB144	Public Utilities - Energy Efficiency and Conservation Programs - Energy Performance Targets and	BGE, PEPCO, WGL

	Low-Income Housing	
SB170	Energy Generation Projects - Required Labor Standards	BGE
SB224	Clean Trucks Act of 2023	BGE, PEPCO
SB250	Environment - Climate Crisis Plan - Requirement	PEPCO
SB337	Utility Contractors - Employment and Licensure - Requirements and Application	PEPCO
SB357	Renewable Energy Portfolio Standard - Solar Energy - Compliance Fees	PEPCO, PE
SB408	Income Tax - Subtraction Modification - Qualified Broadband Grants	CEC, EU
SB447	Anaerobic Digestion Workgroup	CUC
SB453	State and Private Construction Contracts - Prompt Payment Requirements	PEPCO, CG
SB469	Task Force to Study Solar Incentives	PEPCO
SB489	Public Service Commission - Certificates of Public Convenience and Necessity - Local Permits	BGE, PEPCO, EU
SB513	Environment - Collection and Reporting of Drinking Water and Wastewater Data and Information - Requirements	EU
SB516	Cannabis Reform	CG
SB531	Public Water Systems - Supplier Requirements (Water Safety and Cybersecurity Act of 2023)	EU
SB547	Office of Statewide Broadband - Study of Broadband Expansion Incentives	CEC, EU
SB576	Corporate Income Tax - Combined Reporting	BGE, PE
SB586	Natural Resources - Licensed Tree Experts	BGE
SB590	Reclaim Renewable Energy Act of 2023	BGE, PEPCO, CUC
SB593	Condominiums - Common Elements - Clean Energy Equipment	BGE, PEPCO
SB611	Office of the Attorney General - Environmental and Natural Resources Crimes Unit - Establishment	BGE
SB613	Electricity - Community Solar Energy Generating Systems Program and Property Taxes	BGE, PEPCO, PE
SB636	Public Safety - Solar Battery Energy Storage Systems	BGE, PEPCO
SB638	Natural Resources - Submerged Aquatic Vegetation Protection Zones - Aerial Surveys	BGE

SB640	Sales and Use Tax - Electricity for Agricultural Purposes - Exemption	CEC, PE
SB657	Commercial Law - Maryland Antitrust Act - Premerger Notification Requirements and Remedies	BGE
SB663	Maryland Resilient and Clean Energy Homes Act	BGE, PE
SB664	Maryland Strategic Energy Investment Program - Tier 1 Renewable Sources, Solar Energy Systems, and Alterations	BGE, PEPCO
SB689	Public Utilities - Energy Efficiency and Greenhouse Gas Emissions Reductions - Alterations and Requirements	BGE, PEPCO, WGL, CUC, CG
SB697	Energy Storage - Targets and Maryland Energy Storage Program - Establishment	BGE, PEPCO
SB743	Climate, Labor, and Environmental Equity Act of 2023	BGE, PEPCO
SB781	Promoting Offshore Wind Energy Resources Act	BGE, PEPCO
SB800	Critical Infrastructure Cybersecurity Act of 2023	BGE, PEPCO, PE, EU
SB801	Economic Development - Cybersecurity - Cyber Maryland Program	BGE
SB828	Family and Medical Leave Insurance Program - Modifications	BGE
SB843	Climate Change Adaptation and Mitigation Payment Program and Climate Impact Health Coverage Program - Establishment	BGE, CG
SB905	Electric Companies, Gas Companies, and the Department of Housing and Community Development - Energy Efficiency and Conservation Plans	BGE, PEPCO, WGL, PE, CUC, CG
SB931	Public Utilities - Certificate of Public Convenience and Necessity and Meter Aggregation	EU
SB956	Corporations and Associations - Cooperatives - Nonescheat Capital Credits	CEC

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