

Andrew S. Johnston  
Executive Secretary  
Maryland Public Service Commission  
6 Saint Paul Street, 16 th Floor  
Baltimore Maryland 21202-6806  
Re: The 2024–2026 EmPOWER Maryland Program Plans, Case No. 9705

Monday, October 16th, 2023

Chair Hoover and members of the Public Service Commission:

Since 2008, the EmPOWER Maryland program has saved ratepayers more than \$4 billion on energy bills and reduced Maryland's greenhouse gas emissions by the equivalent of 9.6 million metric tons of carbon dioxide. That's equal to taking 2 million cars off the road for a year. Through incentives and rebates for home energy audits, weatherization, and efficient appliances EmPOWER reduces energy consumption, lowering utility bills while minimizing peak demand.

To date, however, the program has not adequately worked to reduce harmful climate emissions and has not delivered for low-income Marylanders, who have received far less in benefits than they have paid in surcharges to the program. It's critical that the legislature make adjustments to EmPOWER in 2024 to set clear greenhouse gas reduction goals, enable incentives for switching to electric heating and appliances, and enact consumer guardrails that direct utilities to deliver savings to ratepayers through in-home improvements. In the time being, we urge you to approve EmPOWER plans for 2024 alone. And we hope you will do all that you can to maximize in-home energy savings, ensure the program doesn't needlessly increase climate emissions, and deliver more equitable access to energy efficiency.

To that end, our top comments on the proposals for the utilities and DHCD are that you:

- **Reject incentives for fossil fuel equipment and appliances in new construction.** Providing such incentives is counter to the state's goals of reducing greenhouse gas emissions.
- **Reject electrification programs as currently proposed.** We emphatically support including electrification programs through EmPOWER as a tool to improve energy efficiency and reduce climate emissions. The PSC should require utilities to improve their electrification plans and submit new electrification plans no later than August 1, 2024. Plans should provide equivalent benefits and opportunities to ratepayers at consistent costs across all five electric EmPOWER

service territories, and be complementary to the federal Inflation Reduction Act's incentives for electric appliances.

- **Limit behavior change to 10% of portfolio total** to encourage more investment in long lasting efficiency improvements.
- **Reject CVR as a front-of-meter tool to hit EmPOWER goals.** Utilities have already made investments in equipment for CVR and the savings will go on regardless of EmPOWER. While a useful tool, it is not appropriate in counting towards new energy savings.
- **Reject the performance incentives as proposed by the utilities.** While we are open to performance incentives (and penalties) to encourage utilities to meet their goals, these proposals are insufficient.

As a state, we must conserve more energy, use energy more wisely and efficiently, and rely on sources of energy that are clean, renewable and less environmentally damaging. Doing so will create big savings for our climate, our health and our wallets.

It's critically important that the Department of Housing and Community Development reach and exceed its goals for low-income energy efficiency and the state ramp-up investment in energy efficiency and electrification for low-income households through a whole-home retrofit program.

As Maryland scales up our efforts to electrify our homes, we are counting on you to support policies that continue to balance the impacts of ratepayers and the demands of decarbonization. In that spirit, we hope you will support efforts to expand funding for electrification and energy efficiency beyond the ratepayer funded EmPOWER program; hold utilities accountable to their goals; and protect ratepayers from excessive costs to pad utility profits as we pursue an efficient, electric future.

Thank you for your service to Maryland,

Ruth Ann Norton, Green & Healthy Homes Initiative  
Howard County Climate Action  
Emily Scarr, Maryland PIRG