



October 22, 2020

Honorable Jason M. Stanek, Chairman  
 Honorable Michael T. Richard, Commissioner  
 Honorable Anthony J O'Donnell, Commissioner  
 Honorable Odogwu Obi Linton, Commissioner  
 Honorable Mindy L. Herman, Commissioner

Maryland Public Service Commission  
 6 Saint Paul Street, 16th Floor  
 Baltimore, MD 21202

Dear Chairman Stanek and Commissioners:

**Re: EmPOWER Maryland Program Renewals, Case No. 9494**

As a group of diverse businesses, including manufacturers, trade associations, and service providers with a significant Maryland presence and business interest, we write to voice our support for EmPOWER Maryland and the continuation of the state's energy efficiency programs.

As employers and energy consumers, we understand firsthand how energy policies affect the cost of doing business and the state's economic competitiveness. Our businesses support programs that advance energy efficiency because all Maryland consumers and businesses benefit when we eliminate energy waste. EmPOWER Maryland programs are the lowest-cost energy resources

available and generate ~\$1.22 in benefits for every \$1 invested.<sup>1</sup> By investing in energy efficiency, we can reduce total energy costs for all customers, mitigate the impact of fuel and electricity price increases, and build a more affordable, reliable electricity system for the businesses and people in the state.

Now, more than ever, the state needs a proven, politically popular economic stimulus program. Specifically, we need investments that pay for themselves, create local jobs that are not easily outsourced, save taxpayers money, help hard hit industries, protect vulnerable populations, improve air quality and public health, and position the state to recover as quickly as possible as from the COVID-19 crisis. EmPOWER Maryland is that investment. Maryland has a rare window of opportunity to recover quickly by doubling down on energy efficiency projects and investments. Investing in more efficiency now will result in us creating more jobs and realizing more savings, all at a time when Maryland residents and businesses need it the most.

**For all of these reasons, we urge you to approve the recently filed 2021-2023 EmPOWER Maryland plans and to preserve funding for new and proposed energy-saving initiatives. We further encourage you to broaden program access for all customers, and in particular, for small business and commercial entities. For example, we recommend that you:**

1. **Expand financing options available to commercial customers** – The need for financing has increased due to the COVID-19 pandemic and the economic recession. The Commission should expand low- and no-cost financing options to support the installation of energy efficiency technologies and equipment.
2. **Expand the eligibility threshold for customers participating in small business energy efficiency programs** – The current eligibility limit is 60kW, which severely limits program participation for small to midsize businesses. We recommend that this threshold be increased to 150kW as proposed by Potomac Edison, PEPCO, Southern Maryland Electric Cooperative, and Delmarva Power and Light to allow for more small business participation.

We thank you for your leadership on this important issue and stand ready to work with you. We welcome the opportunity to meet with you and your staff or provide additional information on the benefits that EmPOWER Maryland has delivered for the state and will deliver in the future.

Sincerely,  
2G Energy Inc.  
AB Energy USA

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<sup>1</sup> [https://www.psc.state.md.us/electricity/wp-content/uploads/sites/2/EmPOWER\\_2019-Data.pdf](https://www.psc.state.md.us/electricity/wp-content/uploads/sites/2/EmPOWER_2019-Data.pdf).

Capstone Turbine Corporation  
Carter Machinery  
Combined Heat and Power Alliance  
Cree Lighting, Inc.  
Curtis Power Solutions  
DT Energy Consultants  
E-Finity Distributed Generation  
Energy Management Solutions, Inc.  
Kanin Energy  
National Association of Energy Service Companies (NAESCO)  
Schneider Electric  
Sheet Metal and Air Conditioning Contractors Association (SMACNA) - Maryland Chapter  
Turbine Inlet Cooling Association (TICA)  
Unison Energy  
Uplight  
Washington Gas  
Willdan

CC: All Parties of Record