Maryland Energy Storage Testimony * PSC Case Number 9715

Good morning. Thank you for the opportunity to speak today regarding PSC Case Number 9715, which initiated Maryland's Energy Storage Procurement Proceedings. My name is Diane Cherry, and I represent the Mid-Atlantic Renewable Energy Coalition, or MAREC Action. We are a group of more than 50 developers specializing in utility-scale solar, wind, and energy storage projects, dedicated to accelerating clean energy deployment in Maryland.

MAREC is excited about the passage of the Next Generation Energy Act and its procurement solicitation for 1,600 MW of Front of the Meter, Transmission-Connected energy storage. Our members are ready to develop energy storage projects to meet the targets set by Maryland's Next Generation Act and help Maryland reach its broader target of 3,000 MW by 2033.

Today, I want to focus on how our industry can help Maryland hit that 3,000 MW goal. I have three key points:

1. First, Front-of-the-Meter, Transmission-Connected storage is the backbone of meeting Maryland's target. There are strong projects in the PJM queue today that need a clear pathway to move forward, beyond what's currently in the Next Generation Act.

2. The Next Generation Act 1,600 MW energy storage procurements in 2026 and 2027 are an important path to meeting Maryland's 3 GW goal, but there are different industry business models and program design options the PSC should consider for FTM Transmission Connected Storage. We recommend the PSC go further by creating an additional 600 to 650 MW procurement for these projects, ideally in 2028. This gives time to learn from the first two procurements and provides an alternative route for projects not covered by the Next Generation Act. Projects may need more than two years to be operational, for example.

3. We also urge the PSC to offer long-term contracts of at least 15 years and allow developers the option to choose between full and partial tolling agreements – that

flexibility is not provided in the Next Generation Act. This flexibility will attract competitive bids and ensure the best value for Maryland ratepayers.

4. Third, we ask the PSC to allow flexibility in commercial operation dates. External factors like PJM queue reforms, supply chain delays, and tariffs are real challenges. We recommend the PSC design the program so projects can come online as late as 2033, and use clear maturity requirements — like site control and interconnection rights — to keep the process competitive and low-risk.

Beyond this, we strongly support creating a dedicated Long Duration Energy Storage program, targeting at least 75 MW for projects from 10 hours to multi-day. A separate competitive process will help select the best projects and deliver reliable LDES storage at the lowest cost.

Finally, I want to address utility ownership of storage. We believe utilities should focus on delivering electricity and maintaining the grid — not owning generation assets like storage. Developer-led projects keep costs down through competition, while utility ownership risks higher prices for Maryland ratepayers. A competitive, developer-driven approach is the best path forward for Maryland.

In closing, I want to thank the PSC for its leadership in advancing storage deployment. Energy storage brings real benefits — cleaner, more reliable, and more affordable energy for Maryland homes and businesses. MAREC and our members are ready to help the state meet its ambitious goals