



An Exelon Company



An Exelon Company

February 13, 2020

112 West Street

Annapolis, MD 21401
410-269-7115

OPPOSE – HB 109

House Bill 109 – Public Service Commission – Certificate of Public Convenience and Necessity – Rapid Health Impact Assessment and Final Action

Potomac Electric Power Company (Pepco) and Delmarva Power & Light Company (Delmarva Power) oppose **House Bill 109 – Public Service Commission – Certificate of Public Convenience and Necessity – Rapid Health Impact Assessment Requirement**. House Bill 109 would require an applicant for a Certificate of Public Convenience and Necessity (CPCN) for construction of a generating station, existing overhead transmission line, and qualified generator lead line to conduct a rapid health impact assessment on the project and report on its findings within 45 days after the applicant submits its application to the Public Service Commission (Commission).

House Bill 109 is unnecessary. The current CPCN process already ensures that all environmental, historical, ratepayer impacts and other considerations are addressed by the applicant. The process involves notifying specific stakeholders, public hearings, and the consideration of recommendations by State and local government entities and the project's effect on various aspects of the State infrastructure, economy and environment. The very purpose of the CPCN permitting process is to determine whether the applicant has met the standards for receiving a permit, including the location of projects.

A CPCN process is a comprehensive regulatory process, requiring input from various State agencies such as the Power Plant Research Program, the Department of Natural Resources, and the Maryland Department of the Environment as well as input from impacted local governing body or bodies, landowners, and the public. It is the Commission's statutory obligation to determine whether a CPCN is in the best interests of Maryland and the reliability of the electric system. Specifically, the Commission must consider, among other items the effect of the project on: the stability and reliability of the electric system; economics; esthetics; historic sites; aviation safety; air and water pollution; and the need to meet existing and future demand for electric service.

The Department of Natural Resources (DNR) input to the CPCN process is particularly important. DNR reviews air and water impacts, and in reviewing both it considers the health impacts on persons affected by proposed infrastructure. Specifically, DNR's air pollution review assesses air emissions compliance with federal national ambient air quality standards, which are

determined based on human health risk assessments. The existing CPCN process sufficiently assesses the impact of a particular project and as such House Bill 109 is unnecessary.

For the above reasons, Pepco and Delmarva Power respectfully request an unfavorable vote on House Bill 109.

Contact:

Katie Lanzarotto
Senior Legislative Specialist
202-872-3050
Kathryn.lanzarotto@exeloncorp.com

Ivan K. Lanier
State Affairs Manager
410-269-7115
Ivan.Lanier@pepco.com