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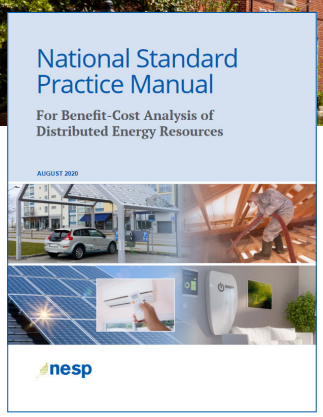
National Standard Practice Manual

CASE STUDY:

Maryland



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NATIONAL ENERGY SCREENING PROJECT

Introduction

The purpose of this case study is to provide an example of how one state, Maryland, has undergone formal processes to review its cost-effectiveness practices using the National Standard Practice Manual (NSPM). Maryland is an excellent example of where a state first applied the NSPM in the context of one distributed energy resource (electric vehicles), and then separately to another DER (energy efficiency). Recognizing the importance of using a consistent BCA framework across all DERs, the Maryland Public Service Commission ("PSC" or "Commission") then opened a new docket – currently underway – to develop a 'Unified' BCA framework using the NSPM.

The NSPM, a project of the National Energy Screening Project (NESP), provides a comprehensive framework for assessing the cost-effectiveness of DERs. The manual is directly applicable to all types of electric and gas utilities and all jurisdictions where DERs are funded by and implemented on behalf of electric or gas utility customers. The NSPM offers a set of guiding principles for DER BCA, as provided in Table 1 below. The principles, based on sound economic practices, present a foundation that jurisdictions can use as the basis for their cost-effectiveness framework.

Table 1. NSPM BCA Principles

Principle 1	**Treat DERs as a Utility System Resource.** Recognize that DERs can provide energy/power system needs and should be compared with other energy resources and treated consistently for BCA.
Principle 2	**Align with Policy Goals**. A jurisdiction's primary cost-effectiveness test should align with applicable policies and goals that serve as basis for investing in or supporting energy resources.
Principle 3	**Ensure Symmetry**. Benefits and costs should be treated symmetrically for any given type of impact of a resource to avoid bias in investment decisions.
Principle 4	**Account for Relevant, Material Impacts**. Cost-effectiveness tests should include all relevant (per applicable policy goals), material impacts including those that are difficult to quantify or monetize.
Principle 5	**Conduct Forward-Looking, Long-term, Incremental Analyses**. BCAs should be forward-looking, long-term, and incremental to scenario without the DER to allow for comparison with alternatives.
Principle 6	**Avoid Double-Counting Impacts**. BCAs can present a risk of double-counting benefits and/or costs. All impacts should therefore be clearly defined and valued to avoid double-counting.
Principle 7	**Ensure Transparency**. Transparency helps to ensure engagement and trust in the BCA process and decisions, and thus practices should ensure documentation of assumptions, methods and results.
Principle 8	**Conduct BCAs Separately from Rate Impact Analyses**. BCA answer fundamentally different questions than rate impact analyses, and therefore these should be conducted separately.

1. Maryland Electric Vehicle (EV) BCA

Background

In early 2021, a working group was formed per the Maryland PSC direction to address deficiencies and concerns around the utilities' EV Pilot BCA methodology (e.g., Office of People's Counsel comments). The Commission ordered that: "the PC44 Electric Vehicle Work Group develop and propose for

Commission consideration a consensus benefit-cost approach and methodology by December 1, 2021 […]" The Commission specifically requested that the EV Work Group examine the *National Standard Practice Manual* and the existing BCA framework used to review the EmPOWER Maryland programs for best practices in developing an EV BCA methodology." (Maryland PSC Order 89678 in Case 9645 in BG&E Multi-Rate Plan Section 238).

The PC44 EV BCA Work Group ('EV WG')[1] convened nearly a dozen times over an 11-month period (January-November 2021) to develop an appropriate cost-effectiveness test for valuing utility EV investments. The first three monthly meetings (January-March) focused on background information on EV-BCA methodology, including:

- Review of the methodology used by BGE and PEPCo as part of their multi-year rate plan applications,
- Examples of EV-BCAs done in other jurisdictions (e.g., CA and NY),
- The EmPOWER Maryland energy efficiency program BCA methodology; and
- The NSPM, where an introductory presentation was provided by Smart Electric Power Alliance in February 2021.

In the next set of meetings (April-June 2021), Commission staff addressed key steps and considerations of the NSPM guidance, including:

- Taking an inventory of policy goals, where general consensus was achieved on Maryland's applicable policy and regulatory goals to inform development of a primary test.
- Developing an initial summary of costs and benefits incurred by utilities, program participants, and society.
- Reviewing key differences between a rate impact measure test and a benefit cost analysis.

After the review of the background material, the Maryland Joint Utilities ('MD JU') recommended development of a whitepaper to propose a new BCA and document stakeholder discussions. Mark Warner of Gabel Associates was retained to develop the whitepaper, with the goal of representing consensus positions across the EV WG to the extent possible. The meetings held from June through November 2021 focused on reviewing multiple versions of draft proposals for the final whitepaper, with each iteration evolving to capture emerging consensus and greater levels of detail.

EV BCA Methodology Report

The EV BCA report fully describes the consensus methodology used to develop the EV BCA framework, including a primary test, referred to as the **MD-EV Jurisdiction Specific Test (MD-EV JST)**. After nearly a year of meetings, the "PC44" EV Work Group submitted the consensus Electric Vehicle BCA Methodology Report to the Commission for approval December 1, 2021, accompanied by a PSC staff lead Summary Report on the Statewide EV BCA Methodology. The Commission accepted the proposal in

[1] The PC44 working group includes the Joint Utilities (Potomac Edison Company, Baltimore Gas and Electric Company("BGE"), Delmarva Power & Light Company, Potomac Electric Power Company ("Pepco"), and SMECO), the office of People's Counsel (OPC), the Maryland Energy Administration, Advanced Energy Economy, Alliance for Transportation Electrification, Montgomery County, Frederick County, and others as listed in Case No 9478.

a hearing January 12, 2022 (see Commission Acceptance of EV BCA Framework in Case No. 9478 - PC44; ML 238539). A summary of key elements of the report is provided below.

Cost-Effectiveness Tests and Rate Impact Assessment

The EV BCA report presents two cost-effectiveness tests adopted by the Commission:

1. **The MD EV-JST (primary test):** Quantifies the cost effectiveness of utility EV programs resulting from impacts on the utility system, host customers (i.e., participants), and society, consistent with Maryland policy goals (i.e., a Jurisdiction Specific Test, or JST); and
2. **The Market-Wide Test (the secondary test):** The same methodology as the MD EV-JST but applies market-wide to quantify the net benefits of vehicle electrification overall when considered on a societal basis. This test considers three sensitivities: all-natural charging (i.e., not managed), all-managed charging, and an intermediate "likely case" as expected result from approved utility filings.

The report also presents an assessment of the rate and bill impacts. Consistent with the NSPM principle #8 – which states that rate impact analysis should be separate from BCA as they answer different questions – two rate impact assessments are provided:

- **ANRI (all):** aggregate non-participating-ratepayer impact (ANRI) as induced by the utility program, including both monetized impacts (on utility bills) and important externalities (such as avoided environmental harm and improved public health). This assessment is provided for both each utility EV-program individually, and for the entire portfolio of programs in combination.
- **ANRI (bills only):** A sensitivity of the ANRI calculation that considered only monetized impact on utility bills (i.e., does not include environmental impact or public health). Both per-program and portfolio-level variations will be developed.

Maryland's approach to this rate and bill impact assessment is a model for how jurisdictions can view rate impact considerations alongside BCA impacts of a DER(s) investment decision, but *not* combine them into a BCA test i.e., a rate impact measure (RIM) test.

The Primary Test: The Maryland EV-JST

The EV WG inventory of costs and benefits considered the range of impacts associated with Maryland policy goals. Based on these goals and the broad impacts resulting from vehicle electrification, a methodology similar to the traditional Societal Cost Test was used as the basis for defining the primary MD EV-JST, consistent with the following principles that align with the NSPM:

1. This societal scope reflects impacts realized by customers participating in the various utility EV programs, impacts realized by the utility, and impacts realized by society at large (within the State, or globally when considering emissions).
2. The portfolio of benefits and costs included in the MD EV-JST are translated into an economic value over a fixed period of time, generally covering the period over which utility program investments are made and the "useful life" of the change induced by the utility EV programs.
3. Costs generally include "up-front" costs associated with delivery of the incentive to a participating customer, and recurring costs over the "useful life" assessed in the test. Benefits generally include the recurring stream of annual impacts over the "useful life" realized by impacted populations.

Further, the MD EV-JST focuses on the impacts directly induced by the utility program, not the total number of EVs on the road. Table 2 below summarizes the impact-factors included in the two BCA tests and the rate and bill impact analyses.

Table 2. Impact Factors for BCA and Rate and Bill Impact Analysis in Maryland

Impact-Factor	MD EV-JST	MW-Test	ANRI (All)	ANRI (Bills Only)
Utility (and Power Sector) Impacts				
Utility Program Administration Costs	Cost	Cost	Increase	Increase
Utility Program Implementation Costs	Cost	Cost	Increase	Increase
Impacts On Capacity Costs	Cost or Benefit	Cost or Benefit	Increase or Decrease	Increase or Decrease
Impacts On Transmission Costs	Cost or Benefit	Cost or Benefit	Increase or Decrease	Increase or Decrease
Wholesale Energy Cost Impacts	Cost or Benefit	Cost or Benefit	Increase or Decrease	Increase or Decrease
Increased Electricity (KWH) Costs (for EV charging)	Cost	Cost	Increase	Increase
Impacts on Grid Reinforcement	Cost or Benefit	Cost or Benefit	Increase or Decrease	Increase or Decrease
Utility-Owned EV Chargers - Costs	Cost	Cost	Increase	Increase
Utility-Owned EV Chargers - Usage $ From EV Drivers	Transfer	Transfer	Decrease	Decrease
Increased RPS Compliance Costs	Cost	Cost	Increase	Increase
T&D Losses	Cost or Benefit	Cost or Benefit	Increase or Decrease	Increase or Decrease
Utility Equipment Incentives	Transfer	Transfer	Increase	Increase
Utility Rate Incentives	Transfer	Transfer	Increase	Increase
Increased Utility Revenues	Transfer	Transfer	Decrease	Decrease
Participant Impacts (from EV Driver Perspective)				
Incremental EV Purchase Costs	Cost	Cost	N/A	N/A
EV Charger Costs (equipment and installation)	Cost	Cost	N/A	N/A
Avoided Vehicle Fuel Costs	Benefit	Benefit	N/A	N/A
Savings From Decreased Vehicle Maintenance	Benefit	Benefit	N/A	N/A
Federal Tax Incentive (EV purchase)	Benefit	Benefit	N/A	N/A
Societal Costs or Benefits (from Society's Perspective)				
Value Of Reduced GHG Emissions	Benefit	Benefit	Decrease	N/A
Public Health Value of Reduced/Shifted Emissions	Benefit	Benefit	Decrease	N/A

The EV BCA report recognizes various key impacts from and characteristics of widespread vehicle electrification in its EV-BCA methodology, such as:

- Changes in emissions
- Reduction in EV owner vehicle operating costs
- Increased electricity use
- Vehicle electrification represents a fuel switching strategy that increases efficiency of energy sources used
- The impact of changing investment varies based on how that equipment is used and by whom (single owner vs shared asset).

The impact factors outlined in the table above represent the full range of impacts that might be applicable to a particular utility EV program. *While the broad inventory of benefit/cost elements considered for each utility EV program is consistent, some of those elements may not be applicable depending on the offer.* The EV BCA report describes how the impact-factors map to three types of utility EV programs within the context of the primary and secondary tests (the MD EV-JST and the MW-Test) and the two ANRI assessments.

- **Managed Residential Charging Programs:** Programs that offer economic incentives to encourage residential customers to charge their vehicles at preferred off-peak times.
- **Multi-Family Charging Programs:** Programs that provide level-2 charging for residents of

multi-family properties to help EV adoption by reducing charging access limitations.

- **Public Charging Programs:** Programs for utility-owned level-2 and DCFC chargers that are available for public use in order to stimulate adoption by expanding public charging capacity.

Importantly, the EV BCA Report describes how a given impact factor could be a benefit or a cost, depending on the program details and the EV use case. Regardless, the structure of the costs and benefits (i.e., the impacts that are included in the cost tests) are consistent in all three cases.

Discount Rates

The EV BCA Report sets forth a net present value discount rate of 2.5% (i.e., the percentage used in all net present value calculations) based on the social cost of carbon (SCC) parameters provided by EPA's Inter-Departmental Working Group (IDWG) on the SCC. The EV WG consensus is that the 2.5% value is reasonable. Lastly, the EV WG agreed that whatever discount rate is used to establish the SCC should also be used to make the NPV calculations for both the societal-scope cost-effectiveness tests (MD-EV JST and Market-Wide tests) and the ANRI calculations. Further, any updates to the EPA IDWG values over time will be considered for updates.

Methodologies for Quantifying Impacts

The report concludes with a section on computational approaches associated with each impact factor, and consideration of the scope to help inform the method, such as: the number of EVs used as the basis for quantifying induced impact), baseline (calculation of a change relative to *what?),* the protocol associated with each factor (i.e. the arithmetic to be used, including identification of the key variables involved), and data sources (i.e. where key assumptions and or inputs for the identified variables). The EV WG recognized that in some cases, the quantification method is constrained by the data available for the calculation. In those cases, an "ideal" computation method is identified, along with the "best available" methodology accepted at the current time.

Since the publication of the EV BCA report, the NESP published the Methods Tools & Resources (MTR) Handbook for Quantifying DER Impacts (March 2022), which provides technical information on how benefits and costs of DER investments can be quantified, whether monetized or applying a qualitative assessment.

Maryland Energy Efficiency Benefit-Cost Analysis

In December 2020, the Maryland PSC issued an Order No. 89679, Case No. 9648, which established a Future Programming Work Group (FPWG) to consider proposals on the future of the EmPOWER Maryland energy efficiency program,[2] including BCA, and file recommendations with the Commission by April 15, 2022. The FPWG[3] included some members of PC44 EV Working Group and others, and it was led by Chief Public Utility Law Judge McLean and Public Utility Law Judge Burke. The FWPG

[2] EmPOWER Maryland is the utility-run energy efficiency programs that are currently required by state law to achieve 2% annual incremental gross energy savings.

[3] The FPWG overlapped with some of the PC44 EV Working Group members but also included others. Members included the Joint Utilities, PSC Staff, Maryland Energy Administration (MEA), Office of People's Counsel (OPC), the statewide evaluators, and other stakeholders including the Building Performance Association, Ceres Energy Optimization Workgroup, Maryland Energy Efficiency Advocates (MEEA) and the Northeast Energy Efficiency Partnerships (NEEP).

recommended use of the NSPM guidance, and its foundational principles, to guide the update to the existing cost-effectiveness testing. NESP provided technical assistance to the FPWG. From October 2021 to January 2022 the FPWG met nearly weekly to discuss modifications to the EmPOWER cost-effectiveness test and ultimately proposed an updated primary test.

Historically, the PSC has required use of both a modified Total Resource Cost (TRC) test and Societal Cost Test (SCT) for cost-effectiveness screening of the EmPOWER Maryland programs.[4] Maryland's modified TRC accounts for certain participant non-energy benefits including water savings, comfort, and reduced bill arrearages. The Societal Cost Test (SCT) includes an air emissions benefit capturing greenhouse gas (GHG) and criteria pollutant emissions abatement. Despite the inclusion of some of these benefits, BCA practices for EmPOWER were not fully aligned with state policy goals and other core BCA principles. There was, therefore, recognition by FPWG participants that a process guided by the NSPM principles was needed to update and improve the test.

How the NSPM Process was Applied

The FPWG process was guided by the NSPM 5-step process to update the EE testing practices as follows:

Step 1. Articulate Applicable Policy Goals

The FPWG undertook a stakeholder-driven process to identify relevant state policies and energy goals in the beginning stages of discussions on cost-effectiveness testing. This led to the creation of a policy inventory matrix which listed applicable policies by relevancy and weight as indicated by stakeholders (see **Appendix A:** Maryland EE BCA Policy Inventory). This list of policies provided a critical foundation that served to help inform subsequent discussions about what BCA impacts and value streams should be included in the cost-effectiveness test.

Step 2. Include All Utility System Impacts

While the current EmPOWER modified TRC test is largely inclusive of utility system impacts, the FPWG investigated whether additional relevant impacts should be added to the test and adopted changes that are outlined further below.

Step 3. Decide Which Non-Utility System Impacts to Include

After the list of applicable policies was developed, the FPWG held extensive discussion on what non-utility system impacts should be included in the test, based on applicable state policies and goals. Environmental impacts, host customer impacts, and impacts on low-income customers were discussed and, informed by policy inventory developed in Step 1, the group ultimately proposed an increased GHG and criteria emissions benefit, participant health and safety benefit, limited income benefit, and avoided upstream methane emissions factor benefit.

Step 4. Ensure that Benefits and Costs are Properly Addressed

Ensuring symmetry was a stated goal in the FPWG process, such that when a certain category of costs was included in the test then the comparable benefits would be captured as well. In some areas, the FPWG identified relevant and material impacts that were more difficult to quantify, so proxy adders were included to capture a reasonable approximation of the value.

[4] PSC Order No. 87082 (2015) established cost-effectiveness requirements currently in place.

The group also considered the methodologies, inputs, and assumptions adopted in the MD EV-JST in an effort to align with Principle 1 of the NPSM which states that DERs should be compared "using consistent methods and assumptions to avoid bias."

Step 5. Establish Comprehensive, Transparent Documentation

Finally, transparency and robust stakeholder input was emphasized throughout the FPWG process, with numerous opportunities for parties to review and provide input. Documentation of the process and the final proposed primary test was captured in the final FPWG report submitted to the PSC and made publicly available.

Primary Maryland Jurisdiction-Specific Test (MJST)

The FPWG process culminated in Future Program Working Group Report to the Commission proposing a consensus Maryland Jurisdiction-Specific Test (MJST).[5] The MJST, described generally as a Maryland-specific societal cost test, is compared to the state's current EmPOWER tests (TRC and SCT) in Table 3, with the MJST showing changes made to the utility system, societal, and host customer impact categories. The proposed MJST includes several new impacts that the FPWG determined were relevant and material, which are not accounted for in the current tests.

Table 3. Comparison of Current MD Testing Practices with Proposed Primary MJST

Impact Factor	Current EmPOWER TRC	Current EmPOWER SCT	Maryland JST
Utility System Impacts			
Energy Generation	✓	✓	✓
Capacity	✓	✓	✓
Ancillary Services	✓	✓	✓
Environmental Compliance			
RPS/CES Compliance	✓	✓	✓
Market Price Effects	✓	✓	✓
Transmission Capacity	✓	✓	✓
Transmission System Losses	✓	✓	✓
Distribution Capacity	✓	✓	✓
Distribution System Losses	✓	✓	✓
Financial Incentives	✓	✓	✓
Program Administration	✓	✓	✓
Utility Performance Incentives/Earnings			✓
Credit and Collection	✓	✓	✓
Risk			✓
Reliability			
Resilience			
Societal Impacts			
Resilience			
Economic Development and Jobs			
Energy Security			
GHG Emissions		*Partially*	✓
Other Environmental Impacts		*Partially*	*Partially*
Public Health			

[5] Future Programming Work Group Report, April 15, 2022, Case No. 9648, Before the Public Service Commission of Maryland.

Impact Factor	Current EmPOWER TRC	Current EmPOWER SCT	Maryland JST
Host Customer Impacts			
DER Measure Costs	✓	✓	✓
Risk			
Reliability			
Resilience			
Other Fuel	✓	✓	✓
Federal Tax Incentive			✓
Non-Energy Impacts (Non-Low Income)			
Transaction costs			
Asset value			
Productivity			
O&M	*Partially*	*Partially*	*Partially*
Economic well-being			
Comfort	✓	✓	✓
Health & safety			✓
Empowerment & control			
Satisfaction & pride			
Water Savings	✓	✓	✓
Non-Energy Impacts (Low Income)			
Reduced Utility Bills (Arrearages Benefit)	✓	✓	✓
Comfort	✓	✓	✓
Health & safety/Other Economic Benefits			✓

For utility system impacts, utility performance incentives associated with meeting EmPOWER program savings goals are included as a cost in the MJST. Additionally, a proxy adder of 10% of avoided energy costs is included to account for a range of risks and hard-to-quantify avoided utility system costs not otherwise included in the test.

In the case of avoided environmental compliance costs, these are embedded in avoided energy and capacity costs. In markets like PJM, market clearing prices for energy and capacity necessarily embed any costs that generators incur to ensure power plant environmental compliance.

For societal impacts, the GHG emissions impact in the MJST captures an upstream methane emissions factor on avoided gas and avoided electric consumption. This is in addition to CO_2 and criteria emissions benefits associated with avoided energy consumption, which is already included in the current EmPOWER SCT (though not in the TRC which has served as the primary test to date).[6] Inputs and assumptions for determining the GHG emissions value are also updated in the MJST, including using the federal social cost of carbon (SCC) at a 2% discount rate (slightly lower than what the EV WG adopted). The changes are intended to reflect MD state climate policy and emissions reduction targets.

For host customer impacts, two proxy adders are included in the primary MJST to account for non-energy impacts that are difficult to quantify: a 10% Health and Safety adder to be applied to certain residential retrofits and HVAC upgrades in addition to the existing comfort benefit, and a 20% Limited Income adder capturing the health and safety and other economic benefits specific to limited income customers. The MJST also adds federal tax credits as benefits.

[6] Note, the criteria emissions benefit is captured separately under "Other Environmental Impacts" in Table 1 although in the current EmPOWER SCT and the proposed MJST it is combined with GHG emissions into a total "air emissions benefit."

Outcome & Next Steps

The final FPWG report was filed with the PSC in April 2022 under Case No. 9648, with a subsequent hearing held in May 2022 to discuss the report recommendations including the proposed MJST. The PSC issued Order No. 90261 on June 15, 2022 accepting the MJST as outlined in the FPWG report.[7]

Several issues related to specific input factors remain unresolved in the final FPWG report, including whether to use the marginal versus average emissions rate for GHG emissions and determining boundary definitions for societal impacts. Some of these issues will be taken up by a dedicated Evaluation Advisory Group. The new NESP MTR handbook, which was not available during the FPWG process, could be used for future refinement and updates to the MJST to help systematically guide and inform some of the more technical issues that came up, including addressing areas of non-consensus.

It is anticipated that other issues will be considered in the Unified Benefit-Cost Analysis proceeding described in more detail in the next section of this case study. That proceeding can also provide an opportunity to ensure consistent cost-effectiveness testing treatment across different DERs, which was limited given the concurrent finalization of the MD EV-JST as the FPWG was developing the proposed EmPOWER MJST.

Unified BCA Docket

The Commission staff leader of the EV WG issued a PSC Staff recommendation to the Commission to consider opening a new proceeding to develop a "Unified BCA" methodology across all DERs using the NSPM, building on the work of the EV and EmPOWER Maryland BCA developments. The Commission agreed and opened Case No. 9674 in December 2021 to explore the process of developing a unified BCA methodology. The Commission also issued a request for comments from interested parties addressing the practical use of a unified BCA for stakeholders, the role of a unified BCA in Commission proceedings, and suggested methodologies for developing the unified BCA.

The Commission received comments from several parties, including the Maryland utilities, nonprofit organizations, consumer advocates, and Commission staff. The comments were generally supportive of developing a unified BCA framework across all DERs in Maryland and using the NSPM to develop the framework.

Based on the comments, the Commission issued Order No. 90212 in May establishing a workgroup to develop a unified BCA framework. It notes in the order that the current BCA practices for DERs have been idiosyncratic and may lead to inconsistent results. A unified BCA framework would more accurately and consistently value the costs and benefits for different DERs and will better align energy efficiency, demand response programs, and long-term planning with state climate and equity efforts. The unified BCA framework may also assist stakeholders to identify the least-cost means to achieve Maryland policy goals, including those of the Greenhouse Gas Reduction Act and the Renewable Portfolio Standard. Importantly, the Commission notes that the development of a consistent DER BCA framework does not mean the test must be identical across DERs and utilities as there may be different benefits and costs that are unique to certain DERs or utilities. The purpose of the unified BCA framework is to better inform stakeholders and the Commission of the available choices to achieve state goals.

The order ultimately establishes a workgroup to focus on the Maryland Unified BCA that will be supported by a consultant funded by utility contributions related to the grid-of-the-future proceeding (PC44). The Commission directed the workgroup to consider the principles and steps outlined in the

[7] MD PSC Order No 90261, pages 32-33.

NSPM to develop the unified BCA, including identifying state policy goals, developing a list of impacts that apply to all DERs, and align the primary BCA test with state policy goals.

Conclusion

The Unified BCA Work Group continued working in Maryland and a separate case study was written covering the 2023-2024 period. For more information and to read the new case study, visit NSPM Application By States.

Policy - Statute, Order, Plan	Description	Relevancy/ Weight	Stake-holder
Act (CEJA) of 2019 (Chapter 757 / Senate Bill 516) MD Code, Public Utilities §7–702	Clean Energy Workforce Account to fund apprenticeships in energy efficiency and other clean energy sectors.	High/Medium Medium/High Medium/ Medium	OPC JU MEEA
2020 Annual Report of the Commission on Environmental Justice and Sustainable Communities (CEJSC)	Most recent report of the CEJSC to the General Assembly.	High/High Medium/ Medium Low/Low	MEEA OPC MEA JU
Energy Savings Goals for State Government (Chapter 289 / HB 662) which codified the governor's 2019 executive order	Set energy savings goals for state-owned buildings calling for 10% savings by 2029 over a fiscal year 2018 baseline.	High/High Medium/High Medium/ Medium	MEA JU OPC MEEA
The Shirley Nathan-Pulliam Health Equity Act of 2021 (Chapter 750 / Senate Bill 52)	Establishing the Maryland Commission on Health Equity to employ a health equity framework by taking a collaborative approach to improve health outcomes and reduce health inequities in the State and incorporating health considerations into broad-based decision making.	High/High Medium/ Medium Low/High	MEA MEEA OPC JU
Energy Storage Pilot Project Act of 2020 (Chapter 427 / Senate Bill 573) MD Code, Public Utilities §7–215	Required the PSC to establish an energy storage program.	Medium/ Medium Low/High Low/Low	OPC JU MEA MEEA
State Workforce Plan	2020-2024 WIOA State Plan	Medium/ Medium	MEA MEEA OPC JU

Appendix A: Maryland EE BCA Policy Inventory

Policy - Statute, Order, Plan	Description	Relevancy/ Weight	Stake-holder
MD Code, Public Utilities §7–211(b)	EmPOWER Act: Energy Efficiency Programs – Calculation of Program Savings and Consideration of Cost–Effectiveness	High/High	JU, MEA MEEA OPC
MD PSC Order No. 87082	2015 PSC order on energy efficiency goals and future cost-effectiveness screening methodologies for EmPOWER.	High/High	JU, MEA MEEA
		High/Low	OPC
Utility Regulation - Consideration of Climate and Labor (Chapter 614 / House Bill 298 2021)	New law went into effect October 2021 requiring the Commission to consider the maintenance of fair and stable labor standards for affected workers and the protection of the global climate in supervising and regulating certain public service companies.	High/High	JU MEA MEEA OPC
MD Code, Environment § 2-1205, et seq)	Regarding development and implementation of GHG emissions reduction plans.	High/High	MEA OPC MEEA
		Medium/High	JU
Greenhouse Gas Emissions Reduction Act (GGRA) of 2016 (Chapter 11 / Senate Bill 323)	Establishing statewide GHG emissions reduction targets and requiring MDE to adopt a final plan to achieve those targets.	High/High	MEEA OPC
		Medium/High	JU MEA
2030 GGRA Plan	Plan adopted pursuant to GGRA (§2–1205(c)(2)).	High/High	MEEA
		High/Medium	OPC
		Medium/ Medium	MEA JU
MD Code, Environment § 1-701	Established Commission on Environmental Justice and Sustainable Communities (CEJSC)	High/High	OPC MEEA
		Medium/High	MEA
		Low/High	JU
MCCC Building Energy Transition Plan (Nov 2021)	Builds on GGRA Plan and establishes recommendations and targets designed to achieve a just transition to a decarbonized buildings sector in Maryland.	High/High	MEEA
		High/Medium	OPC
		Medium/Low	JU
		Low/Low	MEA
Clean Energy Jobs	Increased the State's RPS to 50% by 2030. Established a	High/High	MEA

Policy - Statute, Order, Plan	Description	Relevancy/ Weight	Stake-holder
		Low/Low	
MD Pub Util Code § 7-213	Maryland Electricity Service Quality and Reliability Act	Medium/ Medium	OPC MEEA
		Medium/Low	JU MEA
		Low/High	