MARYLAND
Chamber of Commerce

Via Electronic Mail

August 11, 2026

Ms. Kim Coble, Co-Chair
Mr. Michael Powell, Co-Chair
Mitigation Working Group
Maryland Commission on Climate Change
C/O Maryland Department of the Environment
1800 Washington Blvd
Baltimore, MD 21230

Re: Comments on the Mitigation Working Group's 2026 Draft Recommendations

Dear Co-Chairs Kim Coble and Michael Powell, and Members of the Mitigation Working Group,

Founded in 1968, the Maryland Chamber of Commerce (the Chamber) is the leading voice for business in Maryland. We are a statewide coalition of more than 7,000 members and federated partners, and we work to develop and promote strong public policy that ensures sustained economic growth for Maryland businesses, employees, and families.

As the Mitigation Working Group ("MWG" or "Working Group") prepares to finalize its draft recommendations this Wednesday, **the Chamber respectfully requests that Recommendation #8 be removed and Recommendation #12 not be advanced**.

Recommendation #8, "Require new data centers to use clean energy and other actions to offset energy use," was introduced late in the recommendation development process without prior discussion by the MWG or the opportunity for meaningful stakeholder engagement. Given the significance of the proposal and its potential impacts on economic development, energy reliability, and Maryland's ability to attract investment, it warrants thoughtful discussion before being advanced as a recommendation of the Working Group. Moreover, the recommendation raises significant implementation questions, including the availability of sufficient new clean energy generation and energy storage resources to support large-scale data center development, which have not been evaluated or discussed by the Working Group.

The General Assembly has already recognized the need for a comprehensive evaluation of the data center industry through House Bill 270/Senate Bill 116 of 2025, which established a study of the industry's impacts, including energy requirements and current and forecasted electricity demand. The final report is due by September 1, 2026. We believe it would be premature to recommend new legislative mandates before that work has been completed and policymakers have had the opportunity to review its findings. Accordingly, the Chamber respectfully requests that Recommendation #8 be removed from the MWG's 2026 recommendations.

We also urge the MWG not to advance Recommendation #12, "End accelerated cost recovery for gas infrastructure investments." This recommendation was not previously discussed by the MWG before the voting meeting, leaving stakeholders without a meaningful opportunity to provide input on a proposal with significant implications for Maryland's energy future.

Notably, the Public Service Commission ("PSC" or "Commission") recently determined that this issue should not move forward without further analysis, delaying action on proposed changes to natural gas line extension policies so it could better understand the impacts on Maryland's economy and housing market. Additionally, the Next Generation Energy Act included changes to STRIDE, requiring natural gas utilities to provide additional information on infrastructure replacement plans. That work is ongoing through a proceeding at the PSC. Given that the state's expert utility regulator has concluded that additional study is warranted and has ongoing proceedings to address these issues, it would be premature for the MWG to advance Recommendation #12 before those processes have concluded.

Access to reliable, affordable energy is fundamental to Maryland's economic growth and competitiveness. Policies that increase the cost of connecting businesses, manufacturers, developers, and homeowners to natural gas infrastructure risk making new service financially unfeasible, limiting energy choice, discouraging business investment and expansion, and increasing costs for employers and consumers alike. At a time when businesses are already navigating economic uncertainty and Maryland is working to attract and retain investment, the State should pursue an all-of-the-above energy strategy that preserves affordability, reliability, and customer choice. Given the significance of this proposal, the lack of prior discussion, and the ongoing proceedings before the PSC, we respectfully urge the MWG not to advance Recommendation #12.

We appreciate the opportunity to provide these comments.

Sincerely,

Maryland Chamber of Commerce