



October 26, 2022

The Honorable Gabe Albornoz  
Council President  
Montgomery County Council  
100 Maryland Avenue  
Rockville, Maryland 20850

Dear Council President Albornoz:

The Montgomery County Chamber of Commerce (MCCC) has been closely following Bill 13-22, *Comprehensive Building Decarbonization*, which proposes to require all-electric building standards for new construction, major renovations, and additions to be fully in effect by January 1, 2024. To be clear, MCCC does not oppose clean energy policy solutions. Climate change is a serious global threat to our national security, economy, and our quality of life. However, MCCC has numerous concerns with Bill 13-22 and remains in opposition to its passage.

### **Unrealistic Timeline for Implementation**

The bill calls for an effective date of January 1, 2024 for all-electric building standards in Montgomery County - only 14 months away – which is too soon and will create disruptions, especially for the commercial sector and those in the process of building or renovating structures. MCCC is concerned this bill is proposing ineffective solutions that homeowners, renters, builders, and others will be unable to manage and have in place in just 14 months.

### **County Should Consider Results of Electric Grid Capacity Study**

MCCC urges the County to await the results of a study required by SB 528 – *Climate Solutions Now Act of 2022*, a bill passed this year by the Maryland General Assembly that puts Maryland on the leading edge of states addressing greenhouse gas emissions. The Act requires a study by the Public Service Commission to determine whether there is adequate energy infrastructure in place now, or to identify the need for additional infrastructure.

### **A Competitive Disadvantage for Montgomery County**

Our Chamber is concerned that Bill 13-22 will increase costs for both residential and commercial construction. First and foremost, MCCC wants to see costs in Montgomery County remain competitive within the region. Moving ahead of the State of Maryland on an all-electric standard will put Montgomery County at a competitive disadvantage. If Bill 13-22 passes, Montgomery County would be only the third jurisdiction on the entire East Coast to pass such a standard, making it more difficult to convince new businesses and potential residents to choose Montgomery County.

**Montgomery County Chamber of Commerce**

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**Concerns About Rate Increases for Residents**

There is concern that needed upgrades to the electric grid could necessitate rate increases, which would fall hardest on lower-income households and others who are already struggling with the effects of global inflation. Energy equity is also at risk as wealthier residents can seek alternative energy resources such as self-generation and power storage equipment while other residents cannot.

**Power Grid Disruptions More Likely**

In recent years, a significant increase in disruptions to the electricity supply has been documented locally and nationwide. With residential and commercial consumers relying heavily on a strained power grid for their lives and livelihood, the County Council must consider that there already exists a need for more investment in power grid transmission and distribution assets. Any increases in the need for electricity will further strain the power grid and increase the likelihood of serious system disturbances.

Again, MCCC urges the County Council to reject Bill 13-22. As always, MCCC looks forward to working with the Montgomery County Council on this and other important issues.

Sincerely,



Georgette "Gigi" Godwin  
President & CEO  
Montgomery County Chamber of Commerce

cc: Members, Montgomery County Council