



Andrew S. Johnston
Executive Secretary, Maryland Public Service Commission
William Donald Schafer Tower
6 St. Paul Street, 16th Floor,
Baltimore, Maryland 21202

RE: *Baltimore Gas and Electric Public Network Plan Request* – Case No. 9478

Dear Mr. Johnston:

Charge Ahead Partnership (CAP) files these comments in response to Baltimore Gas and Electric Company's (the Company) November 21, 2025, request for approval of a three-part "Public Network Plan," for consideration at the Commission's administrative meeting on December 23, 2025. Our comments will be narrowly tailored to focus on the Public Network Plan Part 1. Rip and Replace with Existing EV Phase I Budget.

About Charge Ahead Partnership

Charge Ahead Partnership's membership is comprised of businesses, organizations and individuals that share the common goal of expanding Maryland's EV charging network and ensuring Maryland is positioned to meet EV drivers' expectations of quality service, safety and the affordable, competitive pricing to which they have grown accustomed with the established refueling network. Our corporate members, from big box retailers to grocery stores and restaurants, to existing fuel retailers, own the real estate that is best suited for DCFC infrastructure. Many of these businesses are located along highway corridors and offer the amenities that drivers will demand while refueling.

The biggest challenge to widespread EV adoption in Maryland, and consequently also a barrier to Maryland's ambitious greenhouse gas reduction goals, is the lack of a robust, statewide DCFC network that is co-located with the services and amenities, such as food vendors, restrooms, lighting and security, that consumers have come to expect when they refuel. CAP believes that a competitive, market-based approach is the most efficient and economical way to build Maryland's EV charging network so that it promotes fair competition and encourages private investment in the EV charging business.

Comments on Utility Ownership and Baltimore Gas and Electric Company's Request

In August of 2024 the Commission issued Order No. 91297 on the EV Pilot Phase I Evaluation which noted the concerns raised regarding unfair competition with utility-owned charging stations, and indicated that the Commission does not anticipate approving more utility-owned public charging stations in Phase II of the program, but may do so in areas determined to be "underserved." Additionally, in a notable shift the Commission also ordered the utilities to "cease developing new utility-owned charging stations as part of their Phase I programs, though they may complete construction of charging stations already in development." The order also directed the Commissions' EV Workgroup to work with the Maryland Department of Transportation (MDOT) and Maryland's Zero Emission EV Infrastructure Council to determine if the state has a process for determining ideal locations for public charging stations and to "develop a process for determining when it is appropriate to permit utility incentives for ownership of

public charging stations.” All of these recommendations from the Phase I Order represented significant steps forward for EV charging policy in Maryland and the beginnings of a much-needed shift away from utility domination of the EV charging market.

CAP believes that the Commission should continue to transition Maryland’s utilities out of the EV charging business by approving the request from the Company to use existing EV Phase 1 budget to decommission poor performing DCFCs. As the Company recognizes in their request, other market participants, such as private entities, may be better positioned to deploy and maintain high-powered DCFCs.

While use of Maryland’s utility-owned chargers has increased slightly as EV adoption rates continue to climb, utility reports show many being underutilized and continuing to rely on ratepayer funds for ongoing maintenance and operation, an option not available to any private competitor. Furthermore, despite requirements for utility-owned chargers to meet 97% uptime requirements and the current support of ratepayer dollars, studies of Maryland’s utility-owned DCFC continue to find poor reliability, especially when compared to privately owned DCFC.¹ It would be counterproductive to continue to use ratepayer funds to support a charging network that has consistently failed to provide a reliable and convenient charging experience for EV drivers. Doing so will only further suppress private investment and shake confidence in the charging network for those considering adopting EVs.

Conclusion

CAP believes that previous Commission action to limit any future utility-owned charging stations was a step in the right direction for encouraging the development of Maryland’s competitive market. The Commission should continue this positive momentum by approving the Company’s request, opening the door for private entities to step up and provide the charging services that Maryland drivers need, free from unfair competition with regulated electric utilities.

Furthermore, as the Commission continues to consider this Proposal we encourage you to ensure that transparency regarding which chargers are being replaced and which are being decommissioned entirely is paramount to ensure private entities can take this into account when considering their investment. Maryland’s EV charging market should be driven by competition and innovation and not ratepayer funding, and this proposal represents another step forward towards that goal.

Sincerely,

/s/ Jay Smith

Jay Smith

Executive Director

Charge Ahead Partnership

Jay@chargeaheadpartnership.com

www.ChargeAheadPartnership.com

¹ Testimony of Lanny Hartman before the Maryland Senate Education, Energy and Environment Committee, February 18, 2025. <https://www.youtube.com/live/zXWZNUVBV-0?feature=shared&t=9960>.