

MEMO:

To: Bob Sadzinski  
From: John Sherwell  
Subject: Interim RPS report

PPRP submitted an Interim Report Concerning the Maryland Renewable Portfolio Standard to the members of the RPS working group for comment. The stated purpose of the Interim Report is to update the General Assembly on the focus of program's efforts to date and to document the steps for completing the final report. The following are my brief comments on the Report:

#### General

- Efforts to date are covered in Sections III [supply] and V [costs]. III is driven largely from the earlier analysis in the report "2017 Inventory of Renewable Energy Generators Eligible for the Maryland Renewable Energy Portfolio Standard" which shows Maryland to be generally adequately supplied with some shortfalls in '22 – '25. Thus no real surprises. The factual discussion in V shows REC and SREC prices in Maryland to have declined, perhaps reflecting the general adequacy of supply.
- Steps for completing the report are covered in Section IV. A significant amount of work-to-be-done has been listed in this section and probably reflects the real value of the report. Clearly a lot of work remains. It is not clear how, or if, the efforts from the SWOT analysis [Appendix C] will be factored into the final report. It would seem that some of these items would lend themselves to sensitivity analyses in the proposed modeling runs.

#### Specific

- On page 1-4 under Land Use, I would recommend that forest conservation be included along with a discussion on agricultural land impacts.
- On page 1-5 in the discussion of REC requirements and their price effects on out-of-market payments, it may be worth adding a paragraph on nuclear support – ZECs [or whatever Maryland may want to call them]. This issue is called out as a SWOT item and thus apparently on the radar.