

ORDER NO. 92135

H.R.1, Public Law No: 119-21

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BEFORE THE
PUBLIC SERVICE COMMISSION
OF MARYLAND

Administrative Docket
PC 73

January 14, 2026

**ORDER ON REQUEST FOR EXPEDITED CLARIFICATION
OF THE COALITION FOR COMMUNITY SOLAR ACCESS**

On January 9, 2026, the Coalition for Community Solar Access (“CCSA”) filed a Request for Expedited Clarification of Order No. 91984, requesting the Commission confirm that utilities must require site control from interconnection applicants under the Commission’s Small Generator Facility Interconnection Standards under COMAR 20.50.09.¹ In its filing, CCSA stated it was revealed in a recent Interconnection Working Group meeting that utilities are not consistently requiring site control for interconnection, which CCSA argues creates the potential for speculative projects to undermine interconnection queues and potentially delay viable projects.² CCSA notes that, in Order No. 91984, the Commission did not expressly address the issue of site control and argues that, in absence of an express Commission directive regarding site control, the result is inconsistent utility practice.³ CCSA requests the Commission issue an order as soon as possible:

¹ Maillog No. 326033.

² *Id.* at 1-3.

³ *Id.* at 2-3.

- (1) directing BGE, Pepco, Delmarva, and Potomac Edison to immediately ensure interconnection applicants provide proof of site control before interconnection applications are deemed complete and assigned interconnection queue positions under COMAR 20.50.09.12(B)(1) and (C);
- (2) directing BGE, Pepco, Delmarva, and Potomac Edison to review interconnection applications in the queue and confirm that each applicant holding a queue position has provided proof of site control, with a 30-day cure period for any applicants that have not yet provided site control to do so before losing their interconnection queue positions;
- (3) directing the Net Metering Working Group to include mandatory site control as an interconnection application requirement in forthcoming tariff updates required under the Order; and
- (4) directing the Interconnection Working Group to propose amendments to the Commission's Small Generator Facility Interconnection Standards in COMAR 20.50.09 to require proof of site control for interconnection applications.⁴

In Order No. 91984, the Commission recognized that a number of issues relating to interconnection may still need to be addressed.⁵ Accordingly, the Commission directed the Interconnection Work Group to discuss remaining issues and, to the extent any further amendments are needed to COMAR, to submit them no later than 90 days after the issuance of the Order, or February 13, 2026.⁶ The Commission also directed the Net Metering

⁴ *Id.* at 3-4.

⁵ Docket Item No. 48, Order on OBBA Recommendations for Renewable Generation in Maryland at 39 (Nov. 14, 2025).

⁶ *Id.*

Working Group to discuss issues relating to the Subscriber Organization ID and to recommend updated tariff language by the same date.⁷

The Commission understands the Interconnection Work Group is developing emergency regulations pursuant to Order No. 91984 and expects to receive such regulations on or before February 13, 2026. The Commission is concerned that creating a separate comment period to elicit responses to the questions raised by CCSA in its January 9, 2026 filing risks delaying the submission and adoption of such emergency regulations. Should the Work Group be unable to reach consensus on matters related to site control as raised in CCSA's January 9, 2026 request, the Interconnection Work Group is directed to include in its forthcoming filing the differing positions on this issue. The merits of these differing positions will then be discussed at the rulemaking.

With regard to CCSA's request for the Net Metering Working Group's forthcoming recommendations, the Commission has a similar concern about timeliness. Similar to our directives with regard to the Interconnection Work Group, the Net Metering Working Group is directed to include in its updated tariff recommendations any consensus reached regarding site control, and if consensus is not reached, the differing positions on this issue. The merits of these differing positions will then be discussed at the appropriate time.

IT IS THEREFORE, this 14th day of January, in the year of Two Thousand Twenty-Six, by the Public Service Commission of Maryland, **ORDERED**:

(1) that the Interconnection Work Group is directed to include any consensus language reached regarding interconnection-related issues relating to site control raised by

⁷ *Id.* at 7-8.

CCSA in its filing for emergency regulations to be made on or before February 13, 2026, along with any differing positions should consensus not be reached; and

(2) that the Net Metering Working Group is directed to include in its proposed tariff updates any consensus language reached regarding interconnection-related issues relating to site control raised by CCSA, and to file on or before February 13, 2026, proposed tariff updates containing recommended changes, along with any differing positions should consensus not be reached.

/s/ Kumar P. Barve _____

/s/ Bonnie A. Suchman _____

/s/ Odogwu Obi Linton _____

/s/ Ryan C. McLean _____

/s/ Frederick H. Hoover, Jr. _____

Commissioners