

April 2, 2026

VIA ELECTRONIC FILING

Andrew S. Johnston
Executive Secretary
Maryland Public Service Commission
6 St. Paul Street, 16th Floor
Baltimore, Maryland 21202-6806

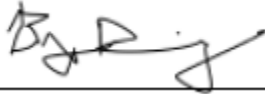
Re: Revisions to COMAR 20.55.03 and 20.55.04, Administrative Docket RM 92

Dear Mr. Johnston:

Attached for filing in the above referenced case, please find the request for rescheduling an in-person rulemaking session for Administrative Docket RM 92 from the Center for Progressive Reform.

Please contact me if you have any questions, thank you for your attention to this matter.

Sincerely,



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Administrative Docket RM92
Revisions to COMAR 20.55.03 and 20.55.04
4/2/2026

Request for Rescheduling of an In-Person Rulemaking Session for RM92

Chair Barve and the Commissioners of the Maryland Public Service Commission,

Thank you for the action taken by the Maryland Public Service Commission (MD PSC or Commission) in addressing the practice of gas line extension allowances (LEAs) in both RM92 and Case No. 9707. The Center for Progressive Reform is supportive of MD PSC's efforts to end LEAs and protect Maryland gas ratepayers from the cost of this practice, and respectfully requests that the Commission reschedule a date for an in-person hearing to consider whether to publish the proposed regulations as submitted in the December 1, 2025 report by the Commission's Technical Staff, or revised based on comments received.

Procedural History

On June 13, 2025, the Commission issued Order No. 91683, which in relevant part directed Commission staff to draft regulations to revise LEA policies based on five enumerated principles, which broadly shifted the financial onus of gas line extensions to the immediate beneficiary, rather than be spread across the rate base.¹

Stakeholders in Case No. 9707, including Upgrade Maryland, submitted initial comments in response to Order No. 91683. The Office of Staff Counsel (Staff) drafted initial regulations and shared those with stakeholders who are parties to Case No. 9707 and held a virtual meeting to discuss that draft with stakeholders prior to filing proposed regulations and requesting that the Commission open a rulemaking docket on December 1, 2025.² On December 4, 2025, the Commission initiated this rulemaking, and invited interested parties to comment on the proposed regulations by January 14, 2026, with an in-person rulemaking scheduled for January 28, 2026, where the Commission would consider publishing the proposed regulations in the Maryland Register as initially submitted, or amended based on stakeholder filings.³

In response, thirty nine (39) parties (including an amendment from Staff) submitted comments related to the proposed rulemaking. Unfortunately, inclement weather across the mid-Atlantic required that the Commission cancel the rulemaking on the 28th, and the Commission stated that it will provide notice of a rescheduled rulemaking at a future date.⁴ Since the cancellation, there has been no action in RM92 in the ensuing two months' time.

¹ The Commission - Order No. 91683 on Stakeholder Proposals for Revision of Gas Policy. Case No. 9707 (ML 319958) (June 13, 2025).

² Office of Staff Counsel - Proposed Regulations on Gas Line Extensions – Long-Term Planning for Gas Companies. Case No. 9707 (ML 324893) (December 1, 2025).

³ The Commission - Notice Initiating a Rulemaking, Opportunity to Comment, and Rulemaking Session. Case No. 9707 and RM92 (ML 324944) (December 3, 2025).

⁴ The Commission - Notice of Hearing Cancellation. Case No. 9707 and RM92. (January 26, 2026).

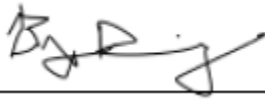
The Commission Should Reschedule the Rulemaking in a Timely Manner

Each day the rulemaking remains paused allows the current LEA framework to persist, which is contrary to the Commission's determination that "a revision to current gas service and main line extension policies is in the public interest."⁵

Rescheduling the hearing promptly will allow stakeholders to provide input based on the existing work and engagement that the thirty nine (39) respondents to the Commission's order establishing RM92 have already undertaken, and continue the substantial effort already expended by the Commission, Staff, and stakeholders in moving the rulemaking forward toward completion. Further, as the cancellation of the rulemaking hearing on January 28 was the result of inclement weather rather than substantive reasons requiring a delay, rescheduling should not have high barriers to enactment.

For these reasons, The Center for Progressive Reform respectfully requests that the Commission timely reschedule the in-person hearing to either adopt or modify Staff's proposed rules.

Sincerely,



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⁵ The Commission - Order No. 91683 on Stakeholder Proposals for Revision of Gas Policy. Case No. 9707 (ML 319958) (June 13, 2025) at p.10.