Sent: Sunday, December 28, 2025 1:00 PM
To: piedmontcomments.psc@maryland.gov
Cc: frederick.hoover1; Mark Takahashi PJMBOM ; Anders, David; Asthana, Manu; jason.kalwa; ralph.larossa
Subject: MPRP Comments – Demand-Side Reliability, Cost Containment, and System Risk Reduction

Dear Chair Hoover and Members of the Public Service Commission,

PJM Board Leadership,

PSEG Leadership,

We respectfully submit these comments for inclusion in the Maryland Public Service Commission's review of the Piedmont Reliability Project (MPRP), and for the consideration of PJM Interconnection and PSEG leadership.

As currently structured, MPRP reflects a traditional supply-side reliability response to what is increasingly a demand-side and operational problem. Across PJM and Maryland specifically, peak stress events, escalating capacity costs, and reliability risks are being driven less by insufficient generation and more by unmanaged load concentration, aging infrastructure, and inflexible demand profiles.

Before Maryland ratepayers are asked to absorb the long-term costs and risks associated with major new transmission and generation infrastructure, we believe the Commission should require full consideration of scalable, immediately deployable demand-side solutions that directly reduce peak load, congestion, and system stress — often at a fraction of the cost and timeline.

Demand-Side Infrastructure Is Reliability Infrastructure

Modern demand-side technologies can deliver measurable reductions in peak demand, transmission congestion, and reserve margin pressure without introducing fuel risk, siting

delays, or interconnection bottlenecks. Treating these tools as secondary or optional materially overstates the need for new supply-side buildout.

By way of example, next-generation demand-side infrastructure platforms such as LS Core™ are already being deployed to materially reduce coincident peak load, demand charges, and localized congestion across existing facilities. These systems operate within existing electrical footprints, require no new generation or transmission, and can be implemented on timelines measured in months rather than years. Performance is directly measurable at the meter level, enabling verification of reliability and cost impacts rather than reliance on modeled assumptions.

Cost Containment and Ratepayer Risk

Large capital projects lock ratepayers into decades of recovery risk under uncertain load forecasts. Demand-side solutions are modular, reversible, and performance-based — aligning cost recovery with actual system benefit rather than speculative future need.

Speed to Impact

Transmission and generation projects face multi-year permitting, construction, and litigation timelines. Demand-side deployments can be implemented across existing facilities within months, delivering immediate reliability relief during the most stressed periods.

Operational Resilience and Security

Reducing peak load at the asset level lowers exposure to cascading failures, extreme weather events, and single-point vulnerabilities. Distributed demand reduction enhances system resilience rather than concentrating risk.

PJM Market Alignment

Failure to fully integrate demand-side infrastructure into reliability planning perpetuates market distortions, capacity cost inflation, and inefficient capital allocation — outcomes that undermine PJM's stated objectives of reliability, affordability, and transparency.

We are not asserting that transmission or generation investments are never warranted. However, proceeding with MPRP without first exhausting proven, cost-effective demand-side alternatives risks overbuilding, mispricing risk, and unnecessarily burdening Maryland consumers.

We respectfully urge the Commission to require:

- A formal demand-side alternatives analysis as part of the MPRP review
- Transparent comparison of cost, timeline, and reliability impact versus supply-side options
- Clear justification that proposed infrastructure cannot be deferred or downsized through demand-side deployment

We appreciate the opportunity to submit these comments and would welcome the opportunity to provide anonymized performance data or participate in a technical workshop to support the Commission's evaluation of demand-side alternatives.

Respectfully submitted,

Neil P. Osnato

Σ VC Fund

Empowering Tangible Innovation

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Zoom meeting upon request

"If it is not right do not do it,

if it is not true, do not say it."

~Marcus Aurelius