

August 7, 2023

Andrew S. Johnston

Executive Secretary

Maryland Public Service Commission

William D. Schaefer Tower

6 St. Paul Street

Baltimore, MD 21202 Re: Docket #9711

Dear Mr. Johnston:

On behalf of the Tuscany-Canterbury Neighborhood Association (TCNA), we are writing this letter in support of the efforts of Baltimore city neighborhoods and residents to stop Baltimore Gas and Electric Co. (BGE) from installing external gas pressure regulators on homes and threatening to shut off gas service. Tuscany-Canterbury is a Baltimore city neighborhood of many historic single-family homes and we are very concerned that the installation of the external regulators will be significantly damaging to the historic facades of our homes and could reduce the value of our homes in the future. We believe that BGE’s project to install external regulators is beneficial only to the company and detrimental to homeowners. We also are extremely concerned that there has been an apparent inequality in how BGE has handled its installation process to date (external vs. internal) between poor and middle-class/wealthier neighborhoods and are deeply dismayed that BGE turned off gas service to a number of homes, particularly in poorer neighborhoods and neighborhoods where the majority of residents are people of color.

Further, we are very concerned about the following:

* No state or federal law requires these installations and that the applicable statute (the Public Utilities Article of the Annotated Code of Maryland, sec. 7-312, amended in 2021) requires relocation of interior gas regulators only in multi-family residential structures and then only “whenever a gas service line or regulator is to be replaced.” We also understand that the statute requires BGE to file a plan to replace multi-family gas regulators on or before 1/1/2022 and that the PSC was required to have approved such a plan on or before 1/1/2023.
* There is a list of seven (7) factors that the PSC is required to consider when reviewing a proposed plan and then must file a report each year beginning on March 1, 2023 with the Governor and the General Assembly regarding BGE’s compliance with relocating gas service regulators.
* From an environmental standpoint, that to reduce global warming, we need to lessen all reliance on fossil fuels and natural gas in the near future and move toward solar and wind energy. BGE’s multi-year, multi-million-dollar project, which will only perpetuate natural gas use, is both counter to all scientific evidence regarding the factors that are contributing to global warming and may also significantly interfere with Maryland’s environmental sustainability goals.
* There is evidence that several years ago when BGE began their regulator replacement project, many of the same regulators were actually installed inside people’s homes. BGE cited these indoor installations as being less risky options. If this prior BGE claim is true, BGE’s current claims of unsafe conditions cannot be true.
* Lastly, we recommend that the potential safety issues related to internal and external regulators be studied in depth by an independent body before further installations resume.

We thank you and the Commission for your work and for your consideration our comments and the comments/testimony offered by other stakeholders and interested parties on this matter.

Please feel free to contact us with questions or for more information at: presidentTCNA@gmail.com

Sincerely,

TCNA Board of Directors

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