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*Adjunct Member

September 28, 2011

Ms. Terry J. Romine, Executive Secretary
Maryland Public Service Commission
6 St. Paul Street
Baltimore, Maryland 21202-6806

RE: Case Nos. 9153 - 9157: EmPower Maryland Programs electricity savings and demand reduction plan and cost recovery proposals

Dear Executive Secretary Romine:

On behalf of the Climate, Energy and Environment Policy Committee of the Metropolitan Washington Council of Governments (COG), I am writing to recommend that LED and induction outdoor lighting incentives should be components of all utilities' EmPower Maryland programs.

In the submitted plans for 2012-2014, one program component from Delmarva and Pepco will replace mercury vapor lamps with high pressure sodium. A COG survey conducted in 2010 showed that LED lights installed in the region are more efficient than high pressure sodium lights. Potomac Edison's proposal offers incentives for LEDs, but only to those municipalities that own and operate their lights. According to the COG survey, almost half of the lights reported in Maryland are leased from the utilities, including a significant number of mercury vapor lights. As part of a comprehensive program that will offer the most electric savings for Maryland, all jurisdictions should have the opportunity to replace any of their outdoor lights with the most efficient technologies available.

COG's Climate and Energy Action Workplan has a goal that 60% of COG's member jurisdictions implement a program to replace older street lights with more efficient technology by 2012. COG formed a Street Light Working Group in 2008 which is examining technologies and purchasing options. The group supports LED and induction technology for outdoor lighting.

In our opinion, LED and induction outdoor lighting offer a tremendous opportunity to conserve energy and should be a part of the EmPower Maryland program offerings from all utilities.

Thank you for giving this your consideration.

Sincerely,

Jay Fiset, Chair
Climate, Energy and Environment Policy Committee