

Maryland Office of People’s Counsel
Comments to the Federal Trade Commission on
Guides for the Use of Environmental Marketing Claims
April 24, 2023

Thank you for the opportunity to comment on the Federal Trade Commission (“FTC”) Guides for the Use of Environmental Marketing Claims (“Green Guides”).

The Maryland Office of People’s Counsel (“OPC”) is charged with representing the interests of residential utility customers—including gas, electricity, telephones, water, or sewerage customers.¹ In carrying out its statutory mandate, OPC considers “the environmental interests of the State and its residents, including the State’s progress toward meeting its greenhouse gas emissions reduction goals.”² OPC works ensure that customers are not deceived by misleading marketing into making long-term decisions about their energy supply that are likely to prove to be more costly to customers and harmful to the environment.

In response to the climate crisis, Maryland, like many other states, is aggressively pursuing reductions in greenhouse gas (“GHG”) emissions related to electricity generation and building appliance end-uses.³ To meet this end, the Maryland General Assembly has identified building electrification as a priority policy, recognizing its capacity to reduce emissions from fossil fuel use for space and water heating and to reduce Marylanders’ energy costs.⁴ OPC is concerned, however, that Maryland’s policies may be hampered by deceptive and misleading environmental marketing. In response to the inevitable shift away from reliance on fossil fuels for home heating and appliances and towards more sustainable, renewable sources of energy, utilities and retail choice suppliers are representing an increasing number of products and services as “clean,” “renewable” and generally beneficial to the environment. Unfortunately, too many of such claims are confusing to consumers or not truthful. Many, in fact, are deceptive, misleading, and harmful to consumers, causing them to make decisions that will prove to be costly and detrimental to their long-term interests.

OPC applauds the FTC for recognizing the need to revisit and update the Green Guides to make sure they continue to be helpful in (1) protecting consumers from deceptive and misleading environmental marketing, and (2) providing guidance to well-intentioned companies as to what forms of environmental marketing are acceptable. OPC respectfully submits the following comments regarding the Green Guides.

¹ Md. Code Ann., Pub Util. (“PUA”) §2-204.

² *Id.* §2-204(a)(1)(ii).

³ Maryland’s Climate Solutions Now Act (“CSNA”) requires a 60% reduction in GHG emissions from 2009 levels by 2031 and a goal of net-zero GHG emissions by 2045. CSNA §§ 3-4, 2022 Md Laws Ch. 38 (codified in relevant part at Md. Code Ann., Envir. §§ 2-1201, 2-1204.1, 2-1204.2).

⁴ *See* CSNA §§ 10(a)(1)-(2).

I. Introduction

In our work advocating on behalf of residential utility customers, OPC has been concerned by marketing practices from two distinct parts of the energy industry: gas utilities and retail energy suppliers. We explain the challenges with each industry below.

A. Gas Utilities

The transition away from fossil fuel consumption upends the business model for natural gas utilities. Utilities earn a return on and of their infrastructure investments, which is recovered through rates paid by each customer on the distribution system.⁵ The more expansive the infrastructure, the more revenue a utility earns. Accordingly, investor-owned utilities use infrastructure investment as a form of profit maximization.⁶

Incentives to electrify—and building code prohibitions on fossil fuel use—disrupt gas utilities’ business model. Without new customers, gas utilities lack an incentive to expand their distribution system. And if customers begin to leave the gas distribution system, gas utilities will have less justification to replace existing infrastructure that would otherwise serve those customers. Additionally, when customer levels decrease, utilities will have to increase their rates to continue earning the return on and of their investments. These resulting rate increases will further drive customers off of the gas system and, ultimately, create a feedback loop of ever-increasing rates paid by a dwindling numbers of customers.⁷ Any remaining customers will be saddled with excessively high rates and, potentially, stranded costs of utility investments that are no longer economical but have yet to fully depreciate.⁸ Tenants and low-income customers are most vulnerable to these risks, since they have fewer options than more affluent customers.

Gas utilities know that electrification poses an existential crisis.⁹ And the gas industry is seeking to maintain its relevancy. Gas marketers have sought to brand natural

⁵ See *Bluefield Water Works. & Improvement Co. v. Pub. Serb. Comm’n of W. Va.*, 262 U.S. 679, 692 (1923); *Fed. Power Comm’n v. Hope Natural Gas Co.*, 320 U.S. 591, 601 (1944).

⁶ E.g., Exelon Corporation, *Winter 2023 Investor Presentation* at 15, <https://investors.exeloncorp.com/static-files/efb0502e-8ccf-4246-943c-694721118002>.

⁷ In industry parlance, this is referred to as the “death spiral.” See, e.g., Brattle, *The Future of Gas Utilities Series: Transitioning Gas Utilities to a Decarbonized Future* at 11 (August 2021), https://www.brattle.com/wp-content/uploads/2021/08/The-Future-of-Gas-Utilities-Series_Part-1.pdf.

⁸ There are serious rate impacts posed by utilities continuing with business-as-usual despite the shift away from fossil fuels. See Md. OPC, *Climate Policy for Maryland’s Gas Utilities: Financial Implications* (Nov. 2022), <https://opc.maryland.gov/Gas-Rates-Climate-Report>.

⁹ *Future of Gas Utilities Series* at 12 (“Natural gas utilities face increased risk related to decarbonizing the energy sector . . . [T]here are approximately \$150-180 billion of unrecovered gas distribution infrastructure. Utilities will need to consider how to recover their costs from a shrinking customer base, which could lead to higher rates and create a vicious cycle.”).

gas as an environmentally beneficial “bridge” fuel. Gas utilities have promoted natural gas as a form of “clean energy,” and have branded a variety of alternatives to conventional gas—like biomethane and third-party certified gas—as “renewable” and “responsibly sourced” lower carbon alternatives.¹⁰ Some gas utilities have proposed carbon-offsets as a rationale for continuing GHG-emitting operations.¹¹ Yet, like conventional gas, the transmission, distribution, and end-use consumption of these products still results in GHG emissions. As long as customers remain connected to the distribution system and gas in any amount or form is flowing to customers, gas utilities will maintain their relevancy and continue to invest in new infrastructure.

B. Retail Energy Suppliers

Thirteen states, including Maryland, offer retail electricity choice programs.¹² In these states, companies are authorized to compete to sell electricity and natural gas that is delivered by the local utility to retail customers. To attract customers to switch from price-regulated utility service, such companies, referred to as “retail suppliers,” are increasingly motivated to market their products as “green” or otherwise environmentally beneficial through the procurement of renewable energy credits (“RECs”).¹³ Problematically, however, the quality of the RECs that support these claims may vary, and energy suppliers sometimes entice customers with claims of “green” power without explaining what that means or even whether the offers do anything more than comply with existing law.

In short, energy consumers are making decisions about their energy supply based in part on the claimed environmental characteristics of the products and services being offered to them. Unlike purchases at a clothing or grocery store, these decisions have long-term ramifications. In the natural gas context, the decision to remain on the gas distribution system—for example, buy purchasing a new gas furnace—may saddle a

¹⁰ See e.g., American Gas Ass’n, *Net-Zero Emissions Opportunities for Gas Utilities* (Feb. 2022).

¹¹ See e.g. Columbia Gas of Maryland, Inc., *Tariff Addition of Sheet No. 114 – Green Path Rider* (Sept. 16, 2022), available by searching for Maillog No. 242360 at <https://webpsc.psc.state.md.us/DMS/mailllogsearch>. See also *OPC Comments on Columbia Gas of Maryland Application to Modify Tariff to Establish a Green Path Rider Program* at 2, <https://opc.maryland.gov/Portals/0/Files/Publications/Others/01172023%20%20OPC%20Green%20Path%20Rider%20Admin%20Comments.pdf?ver=zzqnBCu8Fxxh7uk8RwhhSQ%3D%3D>.

¹² EIA, *Today in Energy – Residential Retail Electric Choice Participation Rate Has Leveled Off Since 2019* (March 15, 2023), <https://www.eia.gov/todayinenergy/detail.php?id=55820>.

¹³ See e.g., CleanChoice Energy, <https://cleanchoiceenergy.com/> (last accessed Apr. 24, 2023) (“A cleaner future starts with you. Together, we can create a brighter future for all by choosing easy, impactful renewable energy solutions.”); SmartEnergy, <https://smartenergy.com/why-smart/about-us/> (last accessed Apr. 24, 2023) (“SmartEnergy is proud to offer 100% green energy, and it’s our mission to prove that helping the environment doesn’t have to come at the expense of your wallet.”); Energy Harbor, <https://energyharbor.com/en/for-home/green-energy> (last accessed Apr. 24, 2023) (“Energy Harbor offers a wide selection of affordable, 100% clean energy plans that can shrink your home’s carbon footprint and help protect the environment.”).

customer with rapidly increasing energy rates over the coming decades.¹⁴ Confusion about the environmental characteristics of energy products also harms the development of low- and zero-carbon offerings, thereby hampering federal, state, and local efforts to address the climate crisis. Absent more explicit guidance on what forms of environmental marketing are acceptable in the context of energy consumption, energy consumers will continue to be harmed by deceptive and misleading environmental marketing and state and federal climate policies will be undermined.

II. Comments

A. Continuing Need for the Green Guides

This section responds to question A.1 of the Request for Comment.

The Green Guides provide essential guidance for environmental marketing. The Guides provide much needed clarity for identifying how to protect against deceptive environmental claims and ensure that such claims are assessed using a consistent framework.

The Green Guides also inform how Maryland’s Consumer Protection Act (“CPA”)¹⁵ applies in the context of green marketing. In construing the CPA, Maryland law requires “due consideration and weight be given to the interpretations of section 5(a)(1) of the Federal Trade Commission Act by the Federal Trade Commission and the federal courts.”¹⁶ Thus, the Green Guide’s interpretation of how section 5(a)(1) applies to environmental marketing claims informs whether a given marketing claim is an “unfair, abusive, or deceptive trade practice” under state law. For states—such as Maryland—that have not enacted consumer protection laws or regulations specific to environmental marketing, the Green Guides are a helpful tool for consumer advocates seeking to reign in deceptive and misleading advertising.

¹⁴ OPC’s *Climate Policy for Maryland’s Gas Utilities* report found that replacing fossil gas with lower carbon alternatives would cause the rates of the State’s largest gas utility, Baltimore Gas & Electric, to increase two to three times 2021 levels by 2035 and seven to eleven times 2021 levels by 2050, with similar ranges of rate increases for Maryland’s two other large gas utilities. *Climate Policy for Maryland’s Gas Utilities* at ii, 21.

¹⁵ Md. Code Ann., Com. L. §§ 13-101 et seq.

¹⁶ *Id.* at §13-105.

B. Renewable Energy Claims

This section responds to questions A.3 & A.15 of the Request for Comment.

1. The Green Guides should clarify what types of energy sources can marketed as “renewable.”

Although the Green Guides currently address claims that a product is made with or a service uses renewable energy,¹⁷ the Green Guides stop short of advising on which sources of energy can be marketed as “renewable.” As State and federal climate policies incent further renewable energy development, marketers may describe new products or services as “renewable” irrespective of the relative GHG emissions intensity of those products.

For example, biomethane is being marketed and sold to consumers as “renewable natural gas.”¹⁸ The source of biomethane—i.e. household or animal waste—may indeed be “renewable” in a technical sense, but the use of biomethane is not: when it is combusted, biomethane—like fossil gas—emits carbon dioxide, and leaks that occur during production, transmission, and distribution release methane directly into the atmosphere.¹⁹ Though the use of some forms of biomethane may be carbon negative, other forms are not. Woody biomass—essentially wood pellets burned for fuel—is also described as a “renewable” energy, even though combustion of wood results in GHG emissions.²⁰

Many consumers understand the term “renewable energy” to refer to resources that emit zero-GHG when consumed, such as wind, solar, geothermal, and hydropower. They are confused when environmental marketing uses the term “renewable” to characterize more carbon intensive energy sources—such as woody biomass and biomethane. The Green Guides thus should address the term “renewable energy” to stop confusing and potentially misleading and deceptive marketing.

The Green Guides should be updated to provide that marketing referring to “renewable energy” is appropriate only when the energy resource does not emit any emissions. If the marketing claim is applied to resources that are also a source of GHG

¹⁷ 16 C.F.R. § 260.15.

¹⁸ See e.g., Chevron, *Things to Know About Renewable Natural Gas*, <https://www.chevron.com/newsroom/2022/q2/things-to-know-about-renewable-natural-gas> (last accessed April 24, 2023).

¹⁹ See e.g., Emily Grubert, *At Scale, Renewable Natural Gas Could Be Climate Intensive: The Influence of Methane Feedstock and Leakage*. 15 *Env. Research Letters* (Aug. 11, 2020), <https://iopscience.iop.org/article/10.1088/1748-9326/ab9335/pdf>.

²⁰ See e.g., Pellet Fuels Institute, *Woody Biomass Factsheet*, <https://www.pelletheat.org/assets/docs/industry-data/infoguides43284.pdf>.

emissions when combusted, the Green Guides should provide that marketers disclose this fact. The Green Guides should advise that it is deceptive or misleading to equate, directly or by implication, a “renewable” source with a zero-emissions source if distribution and consumption of the renewable source results in net-GHG emissions.

The Guides could provide the following example to illustrate this concept:

A State’s renewable portfolio standard defines “renewable resources” to include solar energy, wind, biomass, methane from the anaerobic decomposition of organic materials in a landfill or wastewater treatment plant, and geothermal. Since the generation and consumption of solar or wind energy does not result in GHG emissions, a marketer can claim it uses “renewable energy” without further qualification. But, if a marketer’s “renewable energy” claims are based on the use of biomass or methane from the decomposition of organic materials, the marketer must disclose that those forms of “renewable energy” are also sources of GHG emissions when consumed.

2. The Green Guides should clarify that marketers cannot base “renewable energy” claims on the purchase of RECs if the RECs are not in compliance with state law.

Maryland, like 29 other states,²¹ has statutorily enacted renewable or clean energy procurement requirements known as the renewable portfolio standard (“RPS”).²² Regulated entities comply with the RPS by procuring renewable energy certificates (RECs), either by generating the renewable energy (and associated certificate) themselves or through procuring the REC in a marketplace. State laws define which RECs are eligible for compliance with the State’s RPS. Maryland, for example, requires entities to procure either Maryland-specific RECs or RECs certified by PJM Interconnection’s Generation Attribute Tracking System (“GATS”).²³

However, what may qualify as a renewable resource in one state may be excluded from another state’s RPS. In turn, this means that a marketer in one state could claim that its product or service is made from “renewable energy” *as defined by the standards of a different state*. For states with more stringent renewable resource standards, such marketing claims may deceive or mislead customers into believing a product or service is made from energy that satisfies the state’s definition of renewable energy.

²¹ Nat’l Conf. of State Leg., *State Renewable Portfolio Standards and Goals*, <https://www.ncsl.org/energy/state-renewable-portfolio-standards-and-goals> (last updated Aug. 13, 2021).

²² PUA § 7-703.

²³ PUA §§ 7-701, 7-709. PJM Interconnection, LLC is a regional transmission operator serving 13 states, including Maryland, and the District of Columbia across the mid-Atlantic and midwestern United States. <https://pjm.com/about-pjm>.

Customers should be able to assume that unqualified renewable energy claims comply with any applicable state law. The Green Guides should advise that renewable energy claims based on the procurement of RECs must, at a minimum, identify the organization that certified the REC. If the RECs procured are not eligible for RPS compliance under State law, the Green Guides should advise that a marketer disclose that fact as well.

The Guides could provide the following example to illustrate this concept:

A retail energy supplier markets an energy product as “renewable” based on the procurement of RECs. The supplier must, at a minimum, identify the organization that certified the RECs. Additionally, if the RECs do not comply with state law in the state in which the product is marketed and sold, the supplier must also disclose this fact.

3. The Green Guides should expand section 260.15 to address renewable energy claims made by retail energy suppliers.

Retail suppliers, like utilities, must comply with Maryland’s RPS. In Maryland, the *only* way for a retail supplier or utility to comply with the RPS is by purchasing RECs. Critically, retail suppliers may point to the RECs procured pursuant to state law to market their products as “green.” But it is misleading for suppliers to market themselves as green for simply meeting a minimum standard that state law requires. The Green Guides should clarify that retail supplier green marketing should disclose whether RECs represent the attributes of renewable energy generation sources as defined under the law of the state of the retail sale, another state’s law, or by a third-party certification organization. The Guides should further clarify that retail energy suppliers should only market their products as “green” if they exceed the requirements of state law. Additionally, retail supplier green marketing should disclose the amount or percentage of RECs the supplier has purchased above the minimum required by law.

The Guides could provide the following example to illustrate this concept:

A retail energy supplier markets its product as “green” based on the procurement of RECs. This practice is deceptive unless (1) the supplier discloses that RECs represent the attributes of renewable energy generation sources, as defined under state law, (2) the product exceeds any existing requirements under state law, and (3) the supplier discloses the amount or percentage of the RECs the supplier has purchased above the minimum required by relevant state law.

C. Clean Energy Claims

This section responds to question A.15 of the Request for Comment.

For years, natural gas companies have deployed the term “clean energy” to describe natural gas because it emits less carbon dioxide (CO₂) than other fossil fuels when combusted.²⁴ Although cleaner burning than other fossil fuels—such as coal—the transportation and consumption of natural gas still emits GHGs, including CO₂. Leaks from gas production, transmission, and distribution infrastructure also increase atmospheric concentrations of methane—a GHG with a far greater relative warming impact than CO₂. According to the most recent Maryland GHG inventory, delivery of gas to end users accounts for 16.68 percent of Maryland’s statewide GHG emissions—11.54 percent from the delivery and end-use combustion, and 5.14 percent from upstream production and transmission.²⁵

“Clean energy” suggests emissions-free energy, or energy generated without combusting fossil fuels, i.e. wind and solar.²⁶ A significant chasm lies between energy that is categorically “clean” and energy that is “cleaner” than a dirtier alternative. Combusting natural gas, for example, is less carbon intensive than combusting coal, but more carbon intensive than rooftop solar—which emits no carbon dioxide. Marketing of natural gas that uses the term “clean energy” confuses consumers about the emissions intensity of natural gas compared to actual zero-emissions sources of energy like wind or solar. By implying such a false equivalency, describing natural gas as “clean energy” is deceptive and misleading.

The Green Guides provide generally that “unqualified general environmental benefits claims are difficult to interpret and likely convey a wide range of meaning” and advise marketers to avoid deception by “us[ing] clear and prominent qualifying language that limits the claim to a specific benefit or benefit.”²⁷ In comments on the National Association of Attorneys General (NAAG) Guide to Environmental Marketing Claims for Electricity, FTC Staff recognized that use of the term “clean” “should probably be treated as [a] general environmental benefit claim” and include qualifying language.²⁸ Yet, the

²⁴ See e.g., American Gas Ass’n, *Natural Gas*, <https://www.aga.org/natural-gas/> (“Natural gas is earth’s cleanest traditional fuel . . .”).

²⁵ Maryland Dep’t of Envir., *2020 Maryland GHG Inventory* (Sept. 24, 2022), <https://mde.maryland.gov/programs/Air/ClimateChange/Pages/GreenhouseGasInventory.aspx>.

²⁶ See Nat’l Ass’n of Attorneys General, Env’tl. Marketing Subcomm. of the Energy Deregulation Working Grp., *Guide to Environmental Marketing Claims for Electricity*, at 14 (Dec. 1999), https://www.epa.gov/sites/default/files/2018-05/documents/naag_0100.pdf.

²⁷ 16 C.F.R. § 260.4.

²⁸ FTC Staff Comments on Nat’l. Ass’n. of Att’ys. Gen. Discussion Draft Guidelines to Environmental Marketing Claims for Electricity 4 (1998), https://www.ftc.gov/sites/default/files/documents/advocacy_documents/ftc-staff-comment-nationalassociation-

Green Guides are currently silent on use of the term “clean energy.” Such marketing claims may be thus unlikely to trigger enforcement actions, exposing consumers to confusing and misleading marketing.²⁹

To limit consumer exposure to confusing and deceptive “clean energy” claims, the Green Guides should be updated to state that use of the term “clean energy” may only apply to energy sources whose generation, transmission, distribution, and end-use consumption does not directly result in the emission of known GHGs. The Green Guides should further advise that if the term “clean” or “cleaner” are used in reference to energy sources that do not meet this definition, a marketer must qualify this claim by disclosing the basis of comparison.

The Guides could provide the following example to illustrate this concept:

A natural gas utility includes a statement on its customer bills describing natural gas as “a clean energy.” This statement is deceptive because it misleads customers into believing the emissions profile of natural gas is similar to energy sources like wind and solar. To avoid deception, the utility could instead describe natural gas as “cleaner than coal.”

D. Carbon Offsets

This section responds to question B.1 of the Request for Comment.

1. The Green Guides should address locational issues related to carbon offsets.

As described above, a number of states, including Maryland, have enacted state-specific GHG reduction goals. Yet, for many carbon offsets purchased from established carbon registries, the offsetting activities may occur in other states or even other countries.³⁰ Without proper disclosure, consumers concerned about reducing state or national GHG emissions may be misled about where the offsetting activity is occurring. Moreover, for states with specific GHG reduction goals, consumers may be led to believe

attorneys-general-concerning-green-guides-electricity/v980020.pdf (emphasis added).

²⁹ See Perrin Cooke, *Green Guide Gaps: Expanding FTC Authority Over Low-Carbon Marketing Claims*, 39 Col. J. Env. L. 105, 147–49 (2014).

³⁰ According to the U.C. Berkeley Carbon Trading Project, only 17 percent of the carbon projects listed by the four major project registries (American Carbon Registry, Climate Action Reserve, Gold Standard, and Verra) are located in the United States, across 48 states and the District of Columbia. Ivy S. So, *et al.*, *Voluntary Registry Offsets Database v7.1*, Berkeley Carbon Trading Project, (January 2023), <https://gspp.berkeley.edu/faculty-and-impact/centers/cepp/projects/berkeley-carbon-trading-project/offsets-database>.

that offsets procured will count towards the state’s GHG reduction goals, when, in fact, the offsetting activity will not be reflected in the state’s GHG inventory.

To avoid this potential confusion, the Green Guides should provide that sellers of offsets must disclose the specific location of projects funded by an offset. The Green Guides should further provide that marketing materials referring to carbon offsets also state whether the offsetting activity will appreciably impact federal, state, or local GHG emissions reductions goals.

2. **The Green Guides should encourage the procurement of high-quality carbon offsets by advising that carbon offsets meet the PAVER criteria.**

Carbon offsets have varying degrees of quality.³¹ High-quality offsets may reflect actual emissions reductions, whereas low-quality offsets may reflect only temporary or non-additional emissions reductions. The Green Guides currently provide that marketers should “clearly and prominently disclose if the carbon offset represents emissions reductions that will not occur for two years or longer.”³² This guidance is insufficient to control against the procurement of low-quality offsets, where the permanence and additionality of the claimed emissions reductions are also questionable.

The Green Guides should be updated to instead provide that the emissions reductions or removals associated with a carbon offset meet the five attributes of a high-quality offset, known as PAVER:

- (1) **Permanent:** emissions reductions or removals should not be reversible;
- (2) **Additional:** the emissions reductions should not occur but for the offset;
- (3) **Verifiable:** emissions reductions should be monitored and regularly verified by an independent third-party;
- (4) **Enforceable:** ownership of an offset should be enforceable to ensure that only one credit is claimed for an offset; and
- (5) **Real:** emissions reductions should reflect actual net emissions reductions without carbon leakage occurring.³³

³¹ GHG Management Institute & Stockholm Environmental Institute, *Securing Climate Benefit: A Guide to Using Carbon Offsets (“Carbon Offset Guide”)* at 17 (Nov. 2019) (discussing concerns about carbon offset quality).

³² 16 C.F.R. §260.15(b).

³³ *Carbon Offset Guide* at 18–31.

The PAVER criterion distinguishes high-quality offsets from low-quality offsets. Adhering to the PAVER criteria ensures that consumers are not misled about the nature and extent of emissions reductions attributable to procured carbon offsets. Accordingly, 16 C.F.R. § 260.5(b) should be revised as follows:

(b) It is deceptive to misrepresent directly or by implication that a carbon offset represents emission reductions that have already occurred, will occur in the immediate future, or may be reversible. To avoid deception, marketers should clearly and prominently disclose whether the claimed emissions reductions are permanent, additional, verifiable, enforceable, and real.

E. Proceeding to consider rulemaking under FTC Act

This section responds to question A.19 in the Request for Comment.

The FTC should initiate a proceeding to consider a rulemaking relating to deceptive or unfair environmental claims. A rulemaking would expand the FTC's enforcement capabilities with respect to green marketing and further enhance consumer protections from deceptive environmental marketing.

OPC sincerely appreciates the FTC's consideration of these comments.

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