

DAVID S. LAPP
PEOPLE'S COUNSEL

WILLIAM F. FIELDS
DEPUTY PEOPLE'S COUNSEL

JULIANA BELL
DEPUTY PEOPLE'S COUNSEL

— OPC —
OFFICE OF PEOPLE'S COUNSEL
State of Maryland

6 ST. PAUL STREET, SUITE 2102
BALTIMORE, MARYLAND 21202
WWW.OPC.MARYLAND.GOV

BRANDI NIELAND
DIRECTOR, CONSUMER
ASSISTANCE UNIT

CARISSA RALBOVSKY
CHIEF OPERATING OFFICER

March 28, 2026

The data shows that utilities with forecasted rates saw much faster rate increases and growth in customer costs during the periods of their forecasted rates compared with the utilities' growth in rates and costs over a comparable period in which rates were set using standard ratemaking practices. The data is summarized in this table and explained in more detailed tables below.

Changes in distribution charges

		Prior to forecasted rates	Under forecasted rates
		\$/¢ change	\$/¢ change
BGE Electric	Volumetric Rate	0.46¢	1.29¢
	Fixed Customer Charge	\$ 0.50	\$ 2.00
	Yearly Total Distribution Charges	\$ 55.25	\$ 163.75
Pepco	Average Weighted Volumetric Rate	1.38 ¢	2.92¢
	Fixed Customer Charge	\$ 0.62	\$ 0.66
	Yearly Total Distribution Charges	\$ 156.74	\$ 323.13
DPL	Average Weighted Volumetric Rate	0.53¢	1.02¢
	Fixed Customer Charge	\$ 0.43	\$ 0.70
	Yearly Total Distribution Charges	\$ 61.87	\$ 118.63
BGE Gas*	Volumetric Rate	23.47¢	37.73¢
	Fixed Customer Charge	\$ 1.25	\$ 1.90
	Yearly Total Distribution Charges	\$ 243.42	\$ 365.22

* BGE received similar accelerated cost recovery for gas infrastructure replacement work during the six years prior to its use of forecasted rates.

The tables compare distribution rates before and after the implementation of multiyear rate plans (MRPs) and other alternative forms of ratemaking that utilize forecasted test years over the same time periods for each of the utilities that have used forecasted rates (for Pepco, its MRP and its pending forecasted test year proposal now before the Public Service Commission).

The rates reflected in the tables are based on the actual PSC-approved distribution rates in effect during the years in question. These numbers are factual and are the same as those included in [OPC's rates report](#) first published in 2024, and updated since. The rates are pulled directly out of the utility tariffs, and they have never been disputed. Further explanation about the tables includes:

- We included for each increase the dollar amount of the increase and the percentage increase, but *it is the dollar amount that really matters*. Percentages can be misleading. As rates go up, the same rate increase in dollars will be a smaller percentage because the denominator is larger. For example, in 2011 BGE gas rates went up by 4.06 cents, a 16 percent increase. In 2026, BGE's gas rates went up by 7.26 cents, an increase of 8 percent—half the percentage increase as compared to 2011, even though the actual rate increase was significantly higher. The higher that rates go, the lower increase percentages become.
- To provide a symmetrical basis of comparison, we compare the forecasted rates to the rates in effect for the same number of years prior to MRP implementation: 2014-2020 for BGE and Pepco, for which rates have been impacted under alternative forms of ratemaking for the last six years (including Pepco's current proposal); and 2019-2022 for DPL, whose MRP impacted rates for three years.
- As the baseline for comparison in the tables below, we used the year *before* rates under a MRP became effective: 2020 for BGE and Pepco, whose MRPs became effective in 2021; and 2022 for DPL, whose MRP became effective in 2023. Comparing to the year before the MRP became effective is the only way to show the increase due to the MRP in the MRP's first year.
- BGE gas rates prior to 2020 also reflect the rate impacts of the STRIDE program, which was passed into law in 2013. *STRIDE operates similarly to MRPs and forecasted rates*, allowing advance, accelerated cost recovery based on projections, although it is limited to gas infrastructure replacement.
- For certain years of their MRPs, the Exelon utilities' rates were artificially reduced because of offsets related to the first Trump administration's corporate tax reductions. The Commission applied tax refunds owed to customers to smooth out the impacts of the higher rates from the MRPs.

For more information on utility rates and to access OPC's rates reports, please visit the [Utility Rates & Basics](#) page of OPC's website. The data supporting these tables is also available upon request.

Baltimore Gas and Electric (Electric)

2020 baseline: Rates under BGE's first MRP were effective 1/1/21. BGE is now in its sixth year of MRPs.

		Six years prior to MRP				Six years under MRP			
		2014	2020	\$/¢ change	% change	2020	2026	\$/¢ change	% change
BGE Electric	Volumetric Rate	3.20¢	3.65¢	0.46¢	14%	3.65¢	4.95¢	1.29¢	35%
	Fixed Customer Charge	\$7.50	\$8.00	\$0.50	7%	\$8.00	\$10.00	\$2.00	25%
	Yearly Total Distribution Charges	\$435.06	\$490.31	\$55.25	13%	\$490.31	\$654.06	\$163.75	33%

Pepco

2020 baseline: Rates under Pepco's MRP were effective 6/28/21 through 3/31/2024. Since then, Pepco's rates increased in 2024 based on a forecasted test year, in 2025 from a MRP reconciliation, and the company is now proposing an increase for 2026 based on a forecasted test year.

		Six years prior to MRP & forecasted test years				Six years under MRP & forecasted test years			
		2014	2020	\$/¢ change	% change	2020	2026	\$/¢ change	% change
Pepco	Average Weighted Volumetric Rate	3.27¢	4.65¢	1.38¢	42%	4.65¢	7.57¢	2.92¢	63%
	Fixed Customer Charge	\$7.39	\$8.01	\$0.62	8%	\$8.01	\$8.67	\$0.66	8%
	Yearly Total Distribution Charges	\$441.47	\$598.21	\$156.74	36%	\$598.21	\$921.34	\$323.13	54%

Delmarva Power & Light

2022 baseline: Rates under DPL's MRP were effective from 1/1/23 through 12/31/25. The company has not filed a new rate case since.

		Three years prior to MRP				Three years under MRP			
		2019	2022	\$/¢ change	% change	2022	2025	\$/¢ change	% change
DPL	Average Weighted Volumetric Rate	5.60¢	6.13¢	0.53¢	9%	6.13¢	7.15¢	1.02¢	17%
	Fixed Customer Charge	\$8.30	\$8.73	\$0.43	5%	\$8.73	\$9.43	\$0.70	8%
	Yearly Total Distribution Charges	\$704.67	\$766.54	\$61.87	9%	\$766.54	\$885.17	\$118.63	15%

Baltimore Gas and Electric (gas)

2020 baseline: Rates under BGE's first MRP were effective 1/1/21. Prior to that, BGE gas rates also reflected accelerated cost recovery associated with STRIDE. BGE is now in its sixth year of MRPs.

		Six years prior to MRP				Six years under MRP			
		2014	2020	\$/¢ change	% change	2020	2026	\$/¢ change	% change
BGE Gas	Volumetric Rate	36.13¢	59.60¢	23.47¢	65%	59.60¢	97.33¢	37.73¢	63%
	Fixed Customer Charge	\$13.00	\$14.25	\$1.25	10%	\$14.25	\$16.15	\$1.90	13%
	Yearly Total Distribution Charges	\$500.06	\$743.48	\$243.42	49%	\$743.48	\$1,108.70	\$365.22	49%

The tables use the following assumptions:

- “Total distribution charges” for electric utilities assume average customer usage of 10,800 kWh/yr or 900 kWh/month.
- “Total distribution charges” for gas utilities assume average customer usage of 940 therms/yr or 78.33 therms/month.
- “Average weighted volumetric charge”: Pepco and DPL have different rates for summer and winter electric usage. Pepco has five “summer” months and seven “winter” months. DPL has four “summer” months and eight “winter” months. The rates represented here have been weighted accordingly.
- “Fixed customer charge” is charged monthly.
- The “yearly total distribution charges” combines the customer charges and the volumetric charges.