



July 26, 2022

Bill 13-22 – Comprehensive Building Decarbonization

Position: Oppose

Dear Councilmembers:

The Restaurant Association of Maryland opposes Bill 13-22 as currently drafted. Although there is language in this bill exempting commercial kitchens, the definition of “*commercial kitchens*” references [Chapter 59](#) (County Zoning Code) and is limited to *part of a building that is accessory to Religious Assembly or Public Use*. As currently drafted, this bill does not exempt restaurant new construction/major renovation.

Restaurants depend on the efficiency and performance of gas for cooking. Electric cooking equipment is generally more expensive, much costlier to operate, and lacks the performance restaurants require. Restaurants use gas-fueled equipment for grilling, flame-broiling, sautéing, frying, baking, high-heat woks, and other cooking methods. Gas is also essential for high-temperature pizza ovens.

Though often mentioned as an alternative to gas, electric induction cooking has limitations. Induction cooktops require pans with magnetic flat bottoms. And induction is not an option for other cooking methods like baking, grilling, broiling or woks.

Restaurants rely on the efficiency of gas for hot water needs too. Electric water heaters are not as efficient for commercial uses that require consistent hot water temperatures and flow rates.

We have learned that the Council bill sponsor intends to offer an amendment in Committee to broaden the commercial kitchens exemption to also exempt restaurants and drive-thru restaurants. We would certainly appreciate such an amendment that recognizes the operating needs of our industry. While this amendment would mitigate much of this bill’s impact on our industry, there are a couple of other concerns.

Establishing all-electric building standards for new construction/major renovation will increase the future cost of gas for remaining users like restaurants because gas distribution costs will be spread across a smaller customer base.

New and growing restaurant businesses seeking to open locations in new commercial properties (shopping centers, mixed-use buildings, office buildings, etc.) will likely have limited location options, because many commercial property developers may decide to forego the expense of installing gas lines solely for potential restaurant use. This could hinder restaurant industry growth in the County.

Thank you for your consideration of our concerns.

Sincerely,

A handwritten signature in black ink that reads "Melvin R. Thompson".

Melvin R. Thompson
Senior Vice-President