



**Statement of the Apartment and Office Building Association on Bill 13-22,
Buildings – Comprehensive Building Decarbonization
July 29, 2022**

The Apartment and Office Building Association of Metropolitan Washington (AOBA) is a non-profit trade association representing more than 133,000 apartment units and over 24 million square feet of office space in suburban Maryland. In Montgomery County, AOBA members own/manage over 60,000 of the [County's estimated 83,769 rental units](#) and 20,000,000 square feet of office space. AOBA submits this statement on Bill 13-22.

Before the County pursues full electrification of offices and other buildings, it's important to take into consideration the current natural gas infrastructure and the effect full electrification would have on Washington Gas and, by extension, its customers. As the County pursues its ambitious climate goals, it is critical to consider the impact of electrification on the natural gas utility in Montgomery County and the immediate and long-term consequences for customers across the region who continue to receive natural gas service. If the County continues to pursue the elimination of fossil fuels, the costs to maintain the pipeline infrastructure and ancillary services will be borne by fewer and fewer customers. Many of these customers will also likely be from disadvantaged or overburdened communities that simply cannot afford the high cost to switch their heating source from natural gas to all electric. Thus, any consideration of full electrification must include an evaluation of the impact on local utilities and the customers who receive natural gas or electric service.

Washington Gas is currently accelerating pipeline replacement through a program called the Maryland Strategic Infrastructure Development and Enhancement Plan (STRIDE). The STRIDE program allows Washington Gas to charge customers a monthly fee, shown as a separate line item on customer bills for infrastructure replacement not reflected in base rates. Moving to full electrification for new construction and major renovations will likely result in stranded natural gas infrastructure, which will allow Washington Gas to charge remaining customers for stranded costs through STRIDE or some other yet to be determined mechanism. Thus, and unless remedied, full electrification will force natural gas customers to pay for the replacement of natural gas pipeline infrastructure – even though the infrastructure and related services will be effectively abandoned by the required electrification.