

June 1, 2026



Eastern Shore LAND CONSERVANCY

Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul Street
Baltimore, Maryland 21202

RE: Case No. 9868 – TPE MD QA15A / QA15B / QA15C, Centreville, Queen Anne’s County

Dear Commissioners:

Eastern Shore Land Conservancy (ESLC) respectfully submits the following comments opposing the application by TPE MD QA15A, LLC, TPE MD QA15B, LLC, and TPE MD QA15C, LLC for three co-located community solar generating facilities totaling 9.98 MWac on a single parcel at 164 Little Farm Lane in Centreville, Maryland.

ESLC is a regional conservation organization dedicated to land conservation and responsible growth across Maryland's Eastern Shore. ESLC is concerned this proposal is inconsistent with both the intent of Maryland's recent solar siting reforms and the long-term planning objectives established for this location.

ESLC opposes this proposal because it would place a nearly 10 MW utility-scale solar facility within a designated Tier 2 Growth Area and on land long-planned for future employment and economic development. The project is inconsistent with the intent of Maryland's Smart Growth policies, the siting framework established through *The Renewable Energy Certainty Act* (SB931) and decades of local planning and public infrastructure investments made at the state and local level to support future growth at this location.

The proposed facilities are functionally integrated, co-located on a single property, and collectively comprise a nearly 10 MW solar installation within a designated Tier 2 Growth Area. While each individual application has been structured below the 5 MW threshold, the overall project plainly exceeds that threshold in both scale and effect. ESLC shares the Town of Centreville’s and Queen Anne’s County’s concerns that the proposal represents an attempt to circumvent both the spirit and intent of the limitations established through *The Renewable Energy Certainty Act* which prohibit ground-mounted solar generating stations exceeding 5 MW within Tier 1 and Tier 2 Growth Areas.

This concern is particularly significant here because the property lies within an incorporated growth area and land identified in the Town of Centreville’s Comprehensive Plan for a future Technology Enterprise District, “reserved for master developed and cohesively planned projects.” The area was specifically designated for commercial development to leverage \$50 million in public transportation investments made in the immediate vicinity by the construction of the US 301/MD 304 interchange, overpass, and dual roundabouts.



Converting approximately 75 acres of this strategically planned growth area into a co-located utility-scale solar facility would undermine long-term planning objectives and substantial state infrastructure investments.

ESLC also recognizes the emerging role agrivoltaic systems may play in supporting renewable energy generation and agricultural viability in appropriate locations. The flexibility afforded to agrivoltaic projects under SB931 was intended to preserve viable agricultural production alongside renewable energy generation.

This property was not planned for long-term agricultural preservation. Meaningful agrivoltaic projects are generally best suited to locations where agricultural production remains the principal and enduring land use objective and where such systems can complement an existing farm economy. In this case, the inclusion of sheep grazing does not resolve the fundamental conflict between the proposed use and the intended purpose of the designated Growth Area and planned Technology Enterprise District.

Accordingly, ESLC respectfully urges the Commission to evaluate the proposal as a single comprehensive project and to give substantial weight to Centreville and the County's determination that the application is inconsistent with the intent of both State and local law governing solar siting within designated growth areas.

Thank you for your consideration of these comments.

Sincerely,



Steve Kline

President & CEO

Eastern Shore Land Conservancy