



**Before the General Assembly of the State of Maryland
House Economic Matters Committee
March 9, 2021**

**Testimony of David W. Murray
Executive Director
Chesapeake Solar & Storage Association
HB 1262: Maryland Electricians Act - Revisions
FAVORABLE WITH AMENDMENT**

Thank you for the opportunity to provide testimony on [HB 1262](#). I serve as Executive Director of the Chesapeake Solar & Storage Association, CHESSA, formerly known as the Maryland-DC-Virginia Solar Energy Industries Association (MDV-SEIA). CHESSA is a regional trade association representing over 10,000 solar installers, developers, manufacturers, and other solar workers in Maryland, Virginia and the District of Columbia. Our members also provide energy storage solutions to households, businesses, schools, local governments, and utilities throughout the region. CHESSA is a recognized state affiliate of the Solar Energy Industries Association.

This legislation centers upon a statewide licensure of Master Electricians, Journeypersons and apprentices. CHESSA supports these provisions. The association believes it will help facilitate greater career opportunities for Marylanders, as well as help businesses perform key electrical services across the state. Thank you to Delegate Hornberger for advancing this legislation.

However, this bill as drafted contains a provision that creates a burdensome mandate for the solar industry. In particular, the extra burden is placed primarily upon businesses that perform rooftop residential installations. On Page 29, lines 7-9, Master Electricians or Journeypersons are required to be onsite for the provision of electrical services. In other words, he or she will need to stand by for the entirety of a solar installation, even for activities such as mounting a racking system or hoisting panels up on a roof.

HB 1262 should be amended to retain the status quo for small, residential and commercial solar systems. The basis for CHESSA's recommendation is as follows:

Onsite Requirement Seeks to Address a Non-Existent Problem

There has been no evidence presented to demonstrate the onsite requirement is necessary. The Maryland solar industry has successfully installed over 65,000 residential photovoltaic installations without this requirement in place.

Most of the activities associated with installing a residential or small commercial solar array takes place on a roof: mounting a racking system, installing panels, or connecting the modules. This work that does not require the experience of a Master Electrician or journeyperson. Conversely, Master Electricians or Journeypersons are not trained in solar installation, thus



requiring them to be onsite is a waste of their time. The solar installation process already has several checks on quality and code compliance including the design of the system under the supervision of experienced designers, most with NABCEP certification, the permit review and inspection with the AHJ for code compliance, and the utility interconnection review. A Master Electrician reviews every system in the design to apply for a permit from the local Authority Having Jurisdiction (AHJ). The local Authority Having Jurisdiction inspects the project to ensure it can be safely interconnected to the grid.

In the “[Workgroup to Study Licensing and the Provision of Electrical Services in Maryland](#)” hosted by the Department of Labor in the fall of 2020, the solar industry requested data or evidence from other workgroup members that could demonstrate why this requirement should now apply to photovoltaic installations. We never received any response to that effect.

CHESSA encourages HB 1262’s proponents to compare the quality or safety record of solar installations in the jurisdictions where this requirement is in place against those without the onsite requirement. However, CHESSA is not aware of any evidence demonstrating the onsite requirement correlates with safer, higher quality, or more efficient installations.

It is also worth pointing out that Massachusetts has an onsite requirement like one proposed in HB 1262, but there is no evidence Massachusetts has better or safer residential installs than those in other parts of the country. Should Maryland adopt HB 1262 as written, Maryland would join in a small minority of states with this requirement.

The Onsite Requirement Raises the Cost of Solar

Without this amendment, the Maryland Electricians Act would add \$250 - \$1,000 in costs to each residential solar array. This is because the Master Electrician or Journeyman would need to travel to the job site and stay present for the entirety of the solar installation. They are unlikely to participate in work they are unwilling or not trained to do – such as rooftop installation. Some solar companies solely have Master Electricians – and no Journeymen - on staff, and thus would have to pay the upper bound of this range for each residential installation.

Will Create a “Choke Point” in Residential Solar Installs

The Chesapeake Solar & Storage Association interviewed several of its members to determine the impacts of this requirement, many expressed concerns that residential installations would slow due to this requirement. This is because the requirement creates an artificial labor shortage by mandating select individuals stand by for the totality of the installation.

In Massachusetts, where the onsite requirement applies to the solar industry, firms report challenges hiring and retaining journeymen willing to solely perform solar installs.



Proposed Amendment

CHESSA respectfully requests the Economic Matters Committee amend the bill to exempt a small portion of the solar industry from this requirement. CHESSA's proposed text does not impact utility-scale or large, ground-mounted arrays. Rather, only solar arrays smaller than 200 kW, and are meant to power the underlying building are exempted from the bill language.

Page 29, Line 9: Add the following:

AT LEAST ONE LICENSED MASTER ELECTRICIAN OR JOURNEYPERSON ELECTRICIAN SHALL BE PRESENT AT EACH JOB SITE IN WHICH ELECTRICAL SERVICES ARE PROVIDED, "EXCEPT FOR ACCESSORY-USE PHOTOVOLTAIC INSTALLATIONS FEWER THAN TWO HUNDRED KILOWATTS IN TOTAL CAPACITY."

Thank you for your consideration. CHESSA's support of HB 1262 is contingent upon the above amendment, or similar measure, adopted by the Committee.

Sincerely,

David Murray
Executive Director
Chesapeake Solar & Storage Association (CHESSA, formerly MDV-SEIA)