



March 5, 2021

The Honorable Chairman Dereck E. Davis, Chair
House Committee on Economic Matters
231 House Office Building
Annapolis, MD 21401 - 1991

Re: *House Bill 1262 – Support with Amendments*

Dear Chairman Davis and members of the House Economic Matters Committee,

I write on behalf of Cisco to respectfully request amendments be made to HB 1262 to prevent unintended hardships in the installation and use of common home and office technology.

Cisco Systems is a global technology company that develops, manufactures and sells networking hardware, telecommunications equipment and technology services.

Much like Maryland electricians, the Maryland limited energy industry also has a strong desire for a unified statewide license. However, this bill leaves this subject to a future “low-voltage” license bill without properly defining the term “low-voltage”. Because “low-voltage” has no single widely-accepted definition, this bill could not only unintentionally overlap with a future limited energy license bill, but also immediately limit our ability to operate in the State of Maryland under existing local regulations. The proposed amendment resolves this concern by properly defining limited energy work as separate from hazardous electrical services and also defines the scope of a future limited energy license.

Not all electrical circuits are hazardous. A well-defined subset of circuits known as limited energy, or sometimes as low voltage, do not pose the same threats to life and property as those installed by electricians. Installation of these circuits is currently regulated locally in Maryland. This license is separate from hazardous voltage electrical licenses such as the one proposed in HB 1262.

Limited-energy devices include IP phones, security cameras, internet routers, WiFi access points, audio speakers, badge readers, lighting, cell phone chargers, and many more. The list of devices continues to grow each year. These devices are widely available at local retailers, ready to plug in, and safe to use. Without an appropriate definition of limited energy to differentiate them, HB 1262 would require that these everyday devices, and in fact any electrical device, be installed by a licensed electrician.

Thank you for your consideration of this testimony and the attached proposed amendment. Please do not hesitate to contact me if I can provide any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'JPotterf', with a long horizontal flourish extending to the right.

Jason Potterf
Cisco Engineering Consultant to Government Affairs
National Electrical Code, Principal, Codemaking Panel 18
Cisco
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HOUSE BILL 1262 - AMENDMENT

FOR the purpose of altering the powers and duties of the State Board of Master Electricians; changing the name of the State Board of Master Electricians to the State Board of Electricians; requiring the Department, on or before a certain date, to ~~form a workgroup to adopt~~ provide draft legislation ~~regulations~~ necessary for the regulation and licensing of ~~low-voltage electricians~~ limited energy integrators if certain legislation is not enacted on or before a certain date; prohibiting, beginning on a certain date, local jurisdictions from issuing certain licenses; replacing local electrician licenses with local electrician registrations; authorizing local jurisdictions that issued certain licenses before a certain date to issue registrations under certain circumstances; prohibiting a certain local jurisdiction, beginning on a certain date, from registering a master-level, journeyman-level, or apprentice-level electrician unless it administers certain examinations and registers certain information with the State Board; requiring certain local jurisdictions to report certain information to the Department on or before a certain date each year; allowing a local jurisdiction to take certain actions against certain licensees under certain circumstances; requiring certain local jurisdictions to administer a certain examination in a certain manner; requiring each county and each municipal corporation to enforce certain provisions of law and adopt certain regulations or require certain State licenses under certain circumstances; altering certain licensing and examination requirements; repealing a certain provision of law stating that certain provisions of law do not require certain individuals to hold a State license; altering certain reciprocity requirements for certain individuals authorized to provide electrical services in other states; establishing certain continuing education requirements; authorizing the State Board to waive certain examination requirements and certain experience requirements for certain licensees in certain circumstances; altering the circumstances under which the State Board may deny a license to an applicant, reprimand a licensee, or suspend or revoke a license; authorizing the State Board to set certain fees; providing for the construction of a certain provision of law; requiring a master electrician to display certain information in a certain manner; requiring a licensee to give the State Board certain notice of a change in certain information; prohibiting a person from taking certain actions without a license; establishing certain penalties for certain violations; requiring the State Board to provide a certain notice to each local board in the State; altering certain definitions; defining certain terms; making stylistic and conforming changes; and generally relating to the State Board of Electricians and the licensing and regulation of electricians.

6-101.

“Limited energy integrator” means an individual who has the experience, knowledge, and skill to provide limited energy services on the load side of a transformer, which is connected directly by a licensed electrician or by plugging into an existing receptacle. Voltage of such load side of a

transformer shall not to exceed 100 Volts Alternating Current or Volts Direct Current unless listed to prevent hazards to life and property. Installation shall be in a manner that complies with applicable plans, specifications, codes, or laws.

6-104.

If the state has not enacted legislation establishing a licensing program for individuals who provide or assist in providing ~~low voltage electrical~~ limited energy services on or before July 1, 2024, the ~~Department~~ General Assembly shall, on or before December 1, 2024, ~~adopt regulations~~ consider legislation necessary for the regulation and licensing of ~~low voltage electricians~~ limited energy integrators as prescribed by the following workgroup.

On or before July 1, 2021, the Department shall convene a workgroup to study and make recommendations on the licensing, regulation, and qualifications for individuals who provide limited energy integrator services in the state.

The workgroup shall include:

- (1) a representative of the Department;
- (2) a representative from an electrician licensing authority in a local government;
- (3) a state or locally licensed electrician with varying years of experience;
- (4) an electrical inspector;
- (5) 4 limited energy integrators;
- (6) a representative of an association that represents the integrator community.
- (7) a representative of a manufacturer of integration equipment.

On or before December 1, 2021, the Department shall, in accordance with § 2-1257 of the State Government Article, submit a copy of legislation approved by a majority of the workgroup to the General Assembly on the findings and recommendations of the workgroup convened under this section.