



March 9, 2021

Delegate Derek E. Davis, Chair
Delegate Kathleen M. Dumais, Vice Chair
Economic Matters Committee
Room 231
House Office Building
Annapolis, Maryland 21401

Re: CEDIA's position of Favorable with Amendment on House Bill 1262

Dear Chairman Davis, Vice Chair Dumais, and members of the committee:

On behalf of the Custom Electronic Design and Installation Association (CEDIA), thank you for allowing us the opportunity to provide written testimony with amendment on House Bill 1262, an Act concerning revisions to the Maryland Electricians Act.

CEDIA is the professional trade association of companies that specialize in designing and installing technology systems for the home. These systems include home networking, home automation and communication systems, media rooms, and single or multi-room entertainment systems.

CEDIA represents 16 Maryland-based member companies with bona fide qualifications and years of experience in this specialized, ever-changing and technology-driven field. CEDIA members include residential integrators, trade suppliers (manufacturers and distributors), industry-related professionals, and individual memberships. Our member companies range from small, independent electronic systems contracting firms to large multi-national manufacturers. Most CEDIA members are small, independent residential integrators with a strong entrepreneurial spirit. Residential integrators design, install, and integrate technology systems throughout the home and represent a vital part of the small business community throughout Maryland.

As introduced, House Bill 1262 has numerous consequences for the small businesses of residential integrators and the residential technology systems industry in Maryland and will add unneeded confusion into the marketplace.

CEDIA is requesting an amendment to exempt the work of residential limited energy integrators from the electrical licensing and training requirements for low-voltage work outlined in House Bill 1262.

House Bill 1262 does not make a proper distinction between the work of residential limited energy integrators on low-voltage technology systems and the work of electrical contractors on high-voltage electrical systems. The work of residential limited energy integrators is separate from the electrical trade and should not have the same requirements of an electrical license.

The definition of “provide electrical services” (Page 4, lines 7 – 14) is problematic. This definition would force residential limited energy integrators working throughout Maryland to become or hire an electrical contractor to continue the work they have been trained to do for years. This definition will have a significant impact by increasing the cost of residential projects and determine who can work on residential technology systems projects throughout Maryland.

Using the terms “Low-Voltage Electrical Services” and “Low-Voltage Electricians” (Page 6, 26 - 30) is problematic and will add confusion in the marketplace. The work of residential limited energy integrators is separate from the electrical trade and a low-voltage license should not be referenced as an electrical license. The education and training are different for both trades and the statewide license should respect this difference. This is vital for the consumers of Maryland to differentiate between the two trades and services provided. It is important the legislature and not the Department adopt limited energy regulations and licensing requirements.

The work of residential limited energy integrators is a separate trade from that of electricians and should not be bundled into a single Board of Electricians containing no representation with knowledge of the residential technology systems trade.

Another area of concern in the bill has no representation on the State Board for limited energy integrators who work in the low-voltage industry. This is not proper representation for an industry that has numerous segments that make up this growing industry.

As introduced, House Bill 1262 would place a severe burden on residential limited energy integrators by forcing them to meet the excessive master electrician experience requirements and obtain a statewide license which does not properly represent their profession.

The legislation would limit the growth of the residential technology systems industry by the state only giving examinations at least twice a year. For the growth of the residential technology system industry CEDIA would encourage the low-voltage exam be given at least monthly or utilize a testing center. Furthermore, the Board determines the subjects of the exam without representation of the low-voltage industry.

The current low-voltage requirements of 432 classroom hours and a 6,000 hour (3 year) apprenticeship program (Page 14, lines 6 – 11) are very high bars and does not respect the educational and training needs of the low-voltage industry. Education and training are important, but continuing education on technology applications is more important for our members to meet the needs of their clients.

The legislation has no grandfathering clause for companies that have worked in the residential technology systems industry for years and the legislation eliminates the three years of experience credit required (page 15). Furthermore, the legislation has an effective date of July 1, 2021 and this short timeframe will not allow many companies to prepare for the numerous requirements outlined in House Bill 1262.

Another area of concern in House Bill 1262 is the requirement that a licensed master electrician or journeyman electrician “shall be present at each job site in which electrical services are provided.” This is a difficult requirement for residential limited energy integrators as many are small businesses with limited staffs.

As introduced, electricians are the only ones allowed to apply for permits for the many different projects that will now require an electrical permit. This will limit the number of projects completed throughout Maryland.

By having broad definitions for “provide electrical services” and excessive licensing requirements, this problematic language would force residential limited energy integrators to become master electricians or journeyman electricians to complete any project in Maryland.

For these many concerns listed above, CEDIA asks for support to include an amendment (enclosed) to House Bill 1262 to differentiate between the work of limited energy integrators and electricians in Maryland.

On behalf of CEDIA and our Maryland-based members, thank you for the opportunity to voice our concerns with House Bill 1262 in its current form. CEDIA looks forward to working with Chairman Davis, Vice Chair Dumais, members of the Economic Affairs Committee, staff and other industry stakeholders to address our concerns with House Bill 1262. Thank you for your time and consideration on this important issue.

Respectfully submitted,

A handwritten signature in black ink that reads "Darren Reaman". The signature is fluid and cursive, with the first name "Darren" being larger and more prominent than the last name "Reaman".

Darren Reaman
Director of Government Affairs
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Enc: Amendment for Maryland House Bill 1262

Amendment for Maryland House Bill 1262

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, journey-person-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.