



**LOCAL UNION 410
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS**

March 4, 2025

Committee: Education, Energy, and the Environment

Testimony on SB 908 – Affordable Grid Act

Position: In Support with Amendments

Hearing Date: March 6, 2025

Good afternoon, Chairman Feldman and members of the EEE Committee:

My name is Brian Terwilliger, and I am the Assistant Business Manager for Local Union 410 of the International Brotherhood of Electrical Workers (“IBEW Local 410” or “the Union”).

IBEW Local 410 is a labor organization representing non-managerial utility workers at Baltimore Gas & Electric Company (“BGE”). The Union is the duly elected and recognized exclusive bargaining representative for approximately one-thousand five hundred (1,500) non-managerial employees of BGE, including its non-managerial employees in its five largest departments.

These one-thousand-five hundred (1,500) workers, also called bargaining unit employees (“BUEs”), are among those who contribute daily, directly, and significantly to BGE’s efforts to provide safe and reliable service to its customers. These workers are also fellow members of our community. Unlike contracted laborers who are typically part of a transitory workforce who travel from job to job, state to state, these workers are those who live in Maryland, own or aspire to own homes here, and raise their families in our community. These workers are among the many that would be positively impacted should SB 908 be adopted into law.

IBEW Local 410 strongly supports SB 908, also known as the Affordable Grid Act, and sees it as a critical piece of legislation that will enhance our state’s ability to integrate and optimize Distributed Energy Resources (“DERs”) through improved forecasting mechanisms. The Act’s intended purpose—to require electric companies to develop and submit detailed electric distribution system plans every three years—will provide more

transparency to ratepayers, regulators, and legislators on the electric companies' short-, mid-, and long-term plans and investments for their DERs.

These reporting requirements won't just improve transparency: they will also allow for the development of robust forecasting models that will enhance grid reliability, improve energy planning, and maximize the economic and environmental benefits of DERs such as solar, wind, battery storage, and demand response programs. By leveraging advanced forecasting techniques, utilities and grid operators can more effectively anticipate energy production and consumption patterns, reducing inefficiencies and mitigating potential grid disruptions. These may also support a more resilient and adaptive energy infrastructure, enabling a smoother transition to a decentralized and renewable-based energy system. By implementing forward-thinking strategies, SB 908 will not only strengthen energy security but also pave the way for cost savings for consumers and greater sustainability for our communities.

IBEW Local 410 supports two modifications to SB 908:

First, the Union supports including language—pulled, with modification, from the WARMTH Act—to ensure contractors and subcontractors working for electric companies on DER projects are qualified contractors. This means that they comply with all State, federal, and local laws, rules, and regulations regarding wages, training, and licensing; offer health care and retirement benefits to their employees; participate in registered apprenticeship programs with the State or U.S. Department of Labor; comply with all State and Public Utility Commission reporting requirements; and are making appropriate efforts to recruit and retain Maryland residents to work on these projects.

Second, the Union strongly supports including a prudence review on all reports submitted by electric companies in compliance with SB 908. To that end, the Union proposed adding a description in the report that includes not just what the project costs are, but why the project is planned and how it will serve the public interest. To comply with this requirement, the electric company would include, for each DER: (1) an explanation of the project selection; (2) a description of the intended value to ratepayers the project will provide; (3) a description of the good management judgement to be exercised in the selection of materials and methods to be used to execute the projects; and (4) a description of how the costs—by comparison with alternatives—are justified.¹ The last factor would include a comparison of costs for in-house labor versus contracted labor.

¹ These factors were adopted from Public Utility Commission Order 91396.

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In support of the above, IBEW Local 410 would like to draw this Committee's attention to a recent Order by the Public Utility Commission of Pennsylvania, which concluded that a "commitment to increase [an electric company's] internal workforce will ensure that properly trained individuals are completing infrastructure projects safely and properly, and at a cost less than what [the electric company] pays for contracted labor. These cost savings will be passed on to ratepayers."²

I urge you to support SB 908 and its vital provisions that will improve DER forecasting, enhance transparency, save costs to ratepayers, and ensure that our energy future is both innovative and reliable.

Thank you for your leadership and commitment to advancing our energy policies.

Sincerely,

Brian Terwilliger
IBEW Local 410
Assistant Business Manager

² See *Pa. Pub. Util. Comm'n v. FirstEnergy Pa. Elec. Co.*, Docket No. R-2024-3047068 (Recommended Decision entered Oct. 15, 2024), *affirmed*, 2024 PA. PUC LEXIS 341 (Order entered Nov. 21, 2024). The Office of People's Counsel on page 36 of its Brief, filed February 24, 2025, in Case Nos. 9645 & 9692, similarly recognized that an overreliance on contract labor, rather than utilizing in-house labor, may show irresponsibility and a lack of good management judgment on the part of an electric company.