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February 24, 2026

The Honorable Brian J. Feldman, Chair
Senate Education, Energy, and the Environment Committee
Maryland Senate
Miller Senate Office Building, Room 2 West
11 Bladen Street
Annapolis, Maryland 21401

The Honorable Marc Korman, Chair
House Environment and Transportation Committee
Maryland House of Delegates
House Office Building
6 Bladen Street
Annapolis, Maryland 21401

Dear Chair Feldman, Chair Korman, and Honorable members of the Senate Education, Energy, and the Environment Committee and the House Environment and Transportation Committee:

I respectfully submit this correspondence on House Bill 940 / Senate Bill 596 on behalf of the Mid-Atlantic Pipe Trades Association (United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada, or "UA"), its affiliated local unions throughout Maryland, Virginia, and the District of Columbia, and the Ironworkers District Council of the Mid-Atlantic States. I appear in my capacity as an attorney with Manno & Associates, LLC, a government-relations and regulatory law firm engaged in infrastructure, energy, and workforce policy matters affecting complex industrial development.

At the outset, our clients recognize and support the State's responsibility to ensure electric system reliability and prudent long-term planning as large-load demand increases. At the same time, legislation affecting large-scale energy users—particularly data centers—must be approached with extraordinary care. Data centers represent one of the most significant sources of private capital investment, high-wage construction employment, and long-term tax revenue currently available to Maryland.

By way of context, nationally a single hyperscale data center campus, built out over multiple phases, can represent upwards of \$10 billion in cumulative private capital investment, support thousands of highly skilled construction jobs over many years, and generate tens to hundreds of millions of dollars in state and local revenue over time, depending on project structure and duration. Projects of this scale routinely involve extensive mechanical, electrical, and structural systems and are among the most reliable sources of prevailing-wage construction work and apprenticeship-driven workforce development.

Maryland's broader economic context makes this especially salient. The State is confronting a structural budget imbalance, continued employment volatility, and heightened scrutiny from credit-rating agencies. Recent actions by Moody's to revised the State's outlook—while not unique among states—underscore the importance of maintaining a stable and competitive economic base, protecting revenue growth, and avoiding policy signals that could deter major private investment at precisely the wrong moment.

House Bill 940 / Senate Bill 596, as drafted, risks doing just that. By imposing front-loaded, Maryland-specific requirements on large-load customers as a condition of interconnection, the bill introduces uncertainty at the earliest stages of project planning—often before financing, site development, or construction can proceed. In a highly competitive national market, even modest regulatory uncertainty can result in projects being delayed, downsized, or sited in neighboring jurisdictions.

Importantly, we are not aware of another North American statute that conditions interconnection on a fixed requirement that a customer provide capacity equal to a set percentage of its load. While large-load customers elsewhere are subject to cost-allocation rules, curtailment obligations, or participation in regional reliability programs, those requirements are typically aligned with established RTO frameworks and implemented on a phased basis. Maryland should be cautious about adopting an approach that diverges materially from those norms.

The consequences of chilling data-center development are not abstract. When projects do not advance, construction jobs do not materialize, and the career pathways created through high-quality, state-registered apprenticeship programs—particularly for locally hired workers—do not materialize either. For the building trades we represent, large-load projects are among the most reliable sources of sustained employment and long-term workforce training in today's construction economy.

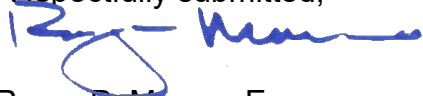
None of this is to suggest that reliability concerns should be ignored. Rather, the State can and should pursue reliability objectives in a manner that is coordinated with PJM and existing regional mechanisms, allows for predictable and phased compliance, and avoids making interconnection contingent on requirements that, by their nature, are addressed during construction and operation—not before a project can even break ground.

House Bill 940 / Senate Bill 596 – Correspondence

For these reasons, we respectfully urge the Committees to consider amendments to House Bill 940 / Senate Bill 596 that preserve Maryland's competitiveness for large-scale industrial development while advancing legitimate reliability goals. Striking that balance is essential if Maryland is to attract investment, stabilize its fiscal outlook, and support the thousands of skilled construction workers and apprentices whose livelihoods depend on these projects.

Thank you for your careful consideration of this matter.

Respectfully submitted,



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