



TESTIMONY OF GARY ARMSTRONG  
BUSINESS MANAGER  
IRONWORKERS LOCAL 5  
ON BEHALF OF IRONWORKERS LOCAL 5  
HOUSE BILL 940 / SENATE BILL 596 – FAVORABLE WITH AMENDMENTS  
BEFORE THE SENATE EDUCATION, ENERGY, AND ENVIRONMENT COMMITTEE  
AND THE HOUSE ENVIRONMENT AND TRANSPORTATION COMMITTEE

Dear Chair Feldman, Chair Korman, and Honorable Members of the Committees:

On behalf of Ironworkers Local 5, I respectfully submit this testimony in support of House Bill 940 / Senate Bill 596, with amendments.

Ironworkers Local 5 represents union ironworkers who perform the structural steel, reinforcing steel, and critical structural systems that form the backbone of large-scale industrial and commercial construction across Maryland. Hyperscale data centers and other large-load industrial campuses represent some of the most significant construction opportunities for our members, often involving multi-building projects constructed on accelerated schedules and at a scale that supports hundreds of union jobs.

We support policies that promote electric grid reliability and responsible long-term planning. However, as currently drafted, House Bill 940 risks deterring large-load industrial development in Maryland by introducing regulatory and financial uncertainty at the earliest stages of project development. Large-load industrial projects are highly mobile, and developers routinely compare Maryland to neighboring states where interconnection processes are predictable and aligned with regional PJM standards. When uncertainty is introduced at the front end, projects are often redirected elsewhere before construction ever begins.

When those projects do not move forward, union construction jobs do not materialize—and the career pathways created through Maryland’s high-caliber, state-registered apprenticeship programs, particularly for locally hired workers, fail to materialize as well.

From the perspective of Ironworkers Local 5, early-stage delays have outsized impacts. Structural steel and reinforcing work occur at the front end of construction and establish the pace and sequencing for all subsequent trades. Mandatory capacity procurement requirements, undefined “carbon-free” procurement obligations, and new state-specific



demand response mandates can delay financing and site readiness, preventing projects from advancing to the construction phase where ironworkers are engaged.

The bill also risks placing Maryland at a competitive disadvantage by layering state-specific obligations on large-load customers that are not required under PJM or in nearby jurisdictions. While we recognize the State's interest in ensuring grid reliability, those objectives can be achieved without imposing prescriptive requirements that undermine project feasibility and investment decisions.

Accordingly, Ironworkers Local 5 urges amendments to House Bill 940 / Senate Bill 596 that:

- Eliminate mandatory capacity procurement and demand response participation as prerequisites to interconnection.
- Align compliance pathways with existing PJM reliability and market structures.
- Provide clear and predictable standards that allow projects to secure financing and proceed to construction; and
- Avoid regulatory frameworks that discourage large-scale industrial development in Maryland.

With these amendments, the bill can strike the appropriate balance between grid reliability and economic competitiveness, ensuring Maryland continues to attract large-load projects that support prevailing-wage construction jobs and robust apprenticeship pipelines for Maryland workers.

For these reasons, Ironworkers Local 5 respectfully requests a favorable report with amendments.

Sincerely,

A handwritten signature in black ink that reads 'Gary R. Armstrong Jr.' The signature is written in a cursive, flowing style.

Gary R. Armstrong  
Business Manager / FST  
Ironworkers Local 5