



Committee on Housing & Economic Development  
% Legislative Information Office  
100 State House Station  
Augusta, ME 04333

March 19, 2025

Re: Public Hearing, LD 741, An Act to Increase Preparedness for Solar Power Adoption in Maine

Dear Senator Curry, Representative Gere, and Members of the Committees:

Thank you for the opportunity to share testimony in support of LD 741, *An Act to Increase Preparedness for Solar Power Adoption in Maine*, on behalf of the Maine Renewable Energy Association (MREA). MREA is a not-for-profit association of renewable energy producers, suppliers of goods and services to those producers, and other supporters of the industry. Our member companies include wind, solar, hydropower, biomass, and tidal energy generators and developers of such projects, as well as companies that provide services to those producers, such as environmental engineers, electricians, and general contractors.

MREA supports LD 741 because building new commercial buildings compatible with future solar energy installations is an efficient use of resources and because it serves to avoid what may be costly retrofits should businesses seek to locate solar energy installations on their rooftop.

Though we are supportive of updating the Maine Uniform Building and Energy Code (MUBEC) to include International Energy Conservation Code (IECC) Appendix CB as proposed by LD 741, we offer for the following suggestions for modifications to certain provisions of the Appendix for the edification of the Committee, knowing that some recommendations may be outside of the scope of their jurisdiction:

- Appendix CB Section 103.1: MREA proposes to remove the language that would restrict the applicability of this code to buildings oriented between 110 and 270 degrees of true north. Solar is low enough in cost that this restriction is unnecessarily narrow. MREA members are regularly installing successful projects on roofs with any orientation (notably, sun exposure is the more significant consideration in whether a rooftop is suitable for hosting solar energy installations). This change would not override the listed exceptions for covered buildings provided in that section.

[www.renewablemaine.org](http://www.renewablemaine.org)

- Appendix CB Section 103.7: This section requires the reservation of interior space to enable the installation of storage. Recognizing that any interior space restriction is a significant burden, that the space requirements are inadequate for many battery installations, and that fire codes are likely to result in exterior battery installations anyway, MREA would propose to revise this provision to require the reservation of outdoor space that could be used for ESS. Alternatively, we propose to exclude 103.7 entirely from the adoption of Appendix CB.
- Appendix CB Section 103.8: This section calls for reserving space for the service panel for interconnecting solar and storage. We propose that if adopted, this provision be clarified to require space for a “Three Pole” breaker if the service is three phase (the existing Appendix language already calls for space for a “Dual Pole” breaker, which is appropriate for single phase service).

Thank you for your consideration of MREA’s testimony.

Sincerely,

A handwritten signature in cursive script that reads "Eliza Donoghue".

Eliza Donoghue, Esq.  
Executive Director