



# AGC MAINE

THE CONSTRUCTION ASSOCIATION

March 11, 2026

Associated General Contractors of Maine  
188 Whitten Road  
Augusta, Maine 04330

Re: Opposition to LD 2229

Senator Curry, Representative Gere, and Members of the Joint Standing Committee on Housing and Economic Development:

My name is Kelly Flagg, and I serve as Executive Director of the Associated General Contractors of Maine (AGC Maine). AGC Maine represents commercial contractors, specialty contractors, and construction firms employing thousands of skilled tradespeople across the state. I am writing to oppose LD 2229, “An Act Regarding Municipal Inspection of the Electrical and Plumbing Components of a Manufactured Home.”

AGC Maine appreciates the committee’s efforts to address Maine’s housing shortage and to support new construction methods that can help expand housing supply, including modular and factory-built housing. Modular construction can be an important part of the solution. We also appreciate the work of the Maine Office of Community Affairs and the Housing Production Innovation Working Group in identifying areas where regulatory clarity is needed as modular construction expands into new building types.

However, AGC Maine respectfully opposes LD 2229 because it raises concerns about public safety, workforce standards, and the maintenance of a level playing field in Maine’s construction market, **specifically as it applies to the commercial market.**

First, safety and inspection consistency must remain top priority. Electrical and plumbing systems are among the most critical life-safety components in any building. Maine’s current licensing and inspection structure exists to ensure these systems are installed by trained professionals and verified through independent inspections.

LD 2229 would allow electrical and plumbing installations in modular construction factories to be performed by unlicensed employees of the manufacturer, provided that a master electrician or master plumber supervises or inspects the work. While we understand the goal of streamlining construction processes and addressing regulatory uncertainty as modular construction expands into larger building types, this proposal creates a different regulatory standard than what applies to buildings constructed on-site throughout Maine communities.

We recognize MOCA's point that factories constructing modules outside of Maine may face challenges complying with Maine's licensing structure. However, this issue reflects a policy decision about how Maine regulates electrical and plumbing work rather than a technical limitation of modular construction itself. The state has historically required licensed professionals to perform this work due to the significant safety implications of electrical and plumbing systems.

Recent discussions before the Electricians' Examining Board regarding solar installations illustrate how carefully Maine has approached questions about who should perform electrical work. In those discussions, stakeholders debated whether certain aspects of solar installations could be performed by general laborers rather than licensed electricians. That debate reinforced the importance Maine places on ensuring electrical work is performed by properly trained and supervised individuals. The Legislature and regulatory boards have consistently recognized that electrical systems involve significant life-safety risks and must remain subject to clear professional standards.

We have also seen recent examples in which modular commercial construction required licensed electrical contractors to correct or complete work performed in a factory setting. In those situations, the electrical systems were still accessible. When modular components are enclosed within completed wall systems, identifying and correcting deficiencies becomes significantly more difficult.

Second, the bill raises concerns about fairness within Maine's construction marketplace. Contractors performing electrical and plumbing work on traditional or "stick-built" projects must employ licensed electricians and plumbers and comply with the full inspection framework required under Maine law. To be clear, AGC Maine is not advocating for the removal of those requirements.

LD 2229 would create a separate regulatory framework for modular construction that allows comparable work to be performed without the same licensing requirements as the rest of the construction industry. This creates an uneven playing field between modular manufacturers and Maine contractors performing similar work.

Modular housing should absolutely compete in Maine's housing market, but it should do so under similar professional standards and regulatory expectations that apply across the construction industry.

There is also a legitimate challenge in inspection coordination that should be addressed through clearer guidance. For example, if a unit is constructed in Bangor but installed and completed in South Portland, it may not make sense for a Bangor inspector to travel to the final installation site. That challenge could potentially be addressed through state inspection authority, certified third-party inspectors, or formal agreements between municipalities. Clarifying those roles could help resolve the confusion MOCA has identified without altering the longstanding licensing structure for electrical and plumbing work.

Finally, AGC Maine is concerned about the potential impact on workforce development and apprenticeship programs. Maine's electrical and plumbing trades rely heavily on structured apprenticeship systems that train individuals under licensed professionals as they work toward their own licensure. In recent years, the Legislature has taken steps to strengthen and expand apprenticeship programs in the skilled trades.

It is worth noting that during prior policy discussions in Maine, including proposals to significantly expand the number of apprentices allowed to work under a single master electrician, both organized labor and open-shop contractors expressed concerns about broad changes that could dilute training quality or reduce supervision. While those groups often approach policy issues from different perspectives, there was notable agreement that Maine's apprenticeship and supervision structure plays an important role in maintaining workforce standards and safety in the electrical trades.

Allowing substantial volumes of electrical and plumbing work to occur outside the traditional licensing and apprenticeship framework risks weakening the training pipeline that helps Maine maintain a skilled workforce in these critical trades. At a time when the construction industry is already facing workforce shortages, policies should strengthen, not undermine, these pathways.

AGC Maine supports efforts to streamline permitting and inspection processes where duplication exists, particularly if modular construction can help deliver housing more efficiently. However, addressing administrative inefficiencies should not come at the expense of longstanding safety, licensing, and workforce standards.

For these reasons, AGC Maine respectfully urges the committee to vote **Ought Not to Pass** on LD 2229, or to substantially amend the proposal to ensure consistent safety standards, licensing requirements, and workforce protections across all forms of construction.

Thank you for your time and consideration.

Sincerely,

Kelly Flagg  
Executive Director  
Associated General Contractors of Maine (AGC Maine)