



Committee on Labor
% Legislative Information Office
100 State House Station
Augusta, ME 04333

April 29, 2025

Re: Public Hearing, LD 1748, An Act to Enhance Businesses' Understanding of Labor Standards and Grow Maine's Energy Economy Through a Training Program

Dear Senator Tipping, Representative Roeder and Members of the Committee:

Thank you for the opportunity to share testimony in opposition to LD 1748, *An Act to Enhance Businesses' Understanding of Labor Standards and Grow Maine's Energy Economy Through a Training Program*, 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.

LD 1748 proposes to direct the Department of Labor (Department), in partnership with the Governor's Energy Office and the Office of Policy, Innovation and the Future, to develop a required training program on labor laws and rules applicable to energy developers that plan to develop projects in the state. MREA opposes this legislation because the Department already has readily available resources specific to the industry and the applicable laws are clear, making the effort unnecessarily duplicative and burdensome.

The proposed training program must incorporate information on "workforce safety training on wage and hour compliance", meet or exceed state labor standards, and include information on statutory obligations of employers – all of which are not unique to the energy industry. The remaining training requirements regarding Maine's Apprenticeship Energy Facility Construction law and prevailing wages at "assisted projects" are unique to energy projects, however, each are carefully and clearly described on the "Energy Facility Construction" page of the Department's website (https://www.maine.gov/labor/labor_laws/efc/index.shtml) and are otherwise clear to MREA's members. As such, MREA does not believe that a required training program would be additive.

www.renewablemaine.org

We do understand and appreciate, however, that there may have been confusion at the outset of the Apprenticeship in Energy Facility Construction law in 2022. Based on feedback from our membership, we believe that that confusion has been resolved. However, we can appreciate that there may be a desire for greater awareness on the part of the Department of proposed projects and projects under construction for the purpose of enforcement. This may be resolved through better communication between the Department, the Department of Environmental Protection, and the Department of Agriculture, Conservation and Forestry. The vast majority of proposed energy projects in Maine must apply for a permit from one or both of these Departments, including Site Location of Development Law permits, stormwater permits, and/or "solar on high-value agricultural land" permits. The Department of Environmental Protection planned to roll out a permit "tracker" in January for the purpose of inter- and intraagency sharing. This tracker, though not yet rolled out (to our knowledge), would increase transparency across State agencies and may address the goals of this bill.

MREA would be open to discussion about ongoing information exchange and education by the Department, as described in this bill, but believes that mandatory training and penalties is unnecessary and overly burdensome. Penalties already exist under 26 MRS §1312 and though the burden in cases subject to those penalties is with the contractor, not the developer, we believe increased intra-agency communication as described above will afford the Department additional opportunity to be aware of and communicate with project developers in the development stage.

For these reasons, we urge the Committee to vote "ought not to pass" on LD 1748.

Sincerely,

A handwritten signature in black ink, reading "Eliza Donoghue". The signature is written in a cursive, flowing style.

Eliza Donoghue, Esq.
Executive Director