



MAINE OFFICE OF  
**Community  
Affairs**

**Testimony of the Maine Office of Community Affairs  
Greg Gilbert, State Building Official  
March 10, 2026**

**Before the Joint Standing Committee on Housing and Economic Development  
In Support of LD 2229: An Act Regarding Municipal Inspection of the Electrical and Plumbing  
Components of a Manufactured Home**

Senator Curry, Representative Gere, and distinguished Members of the joint standing committee on Housing and Economic Development, my name is Greg Gilbert, State Building Official in the Maine Office of Community Affairs. I am testifying in support of LD 2229, An Act Regarding Municipal Inspection of the Electrical and Plumbing Components of a Manufactured Home.

The Maine Office of Community Affairs (MOCA) was established in 2024 to strengthen communication and partnership between the state and Maine communities. Our role is to work directly with municipalities, tribal governments, and regional councils to deliver coordinated and efficient planning, financial support, and technical assistance. Our goal is to help communities anticipate and alleviate challenges, pursue practical solutions, and build stronger, more resilient futures.

In summary, LD 2229, with MOCA's suggest amendments, responds to a need identified in the Housing Production Innovation Working Group. Currently, there is a gap in the regulation of modular units that are used to build multi-unit dwellings and commercial buildings. Because factories are not certified to build to the MUBEC standard in Maine, the factory employees who install electrical and plumbing must be licensed tradespeople. That is not realistic in a factory setting, especially factories that are outside of Maine. MOCA supports LD 2229 with amendments and believes the intent of this bill is to reduce confusion and provide clearer direction in the use of modular construction in occupancy classifications that fall outside the scope of the Manufactured Housing Board (MHB) rules.

Now let me provide a bit more detail. Currently, the MHB rules apply only to one- and two-unit dwellings and townhouses as those are the classifications regulated by the International Residential Code (IRC), the code on which the MHB rules are based. As a result, all other occupancy classifications fall under the Maine Uniform Building and Energy Code (MUBEC) as well as a number of other rules and statutes. For modular 1 and 2 family and townhouses, many of

those rules and statutes are specifically exempted or modified under the MHB rules, which is why expanding the use of modular units into larger buildings has caused confusion.

Growing popularity of modular construction has led to the desired use of this construction style for more than just residential one- and two-unit construction. Concepts and projects have been developed for use with multi-unit residential, hotels, dorms and other types of commercial construction. The challenge arises in the application of this construction style and how to implement it while meeting the state's code and licensing requirements. Some of the more difficult requirements to meet with this method are the electrical and plumbing installation and inspection requirements.

LD 2229 is intended to establish electrical and plumbing oversight similar to that currently used for modular residential construction but with a higher level of oversight to account for the higher level of complexity and the fact that the factories are not certified to construct modules to MUBEC standards. MOCA has proposed an amendment to clarify the direction of the bill by specifying new electrical and plumbing installation and inspection requirements for commercial construction being built by offsite modular manufacturers.

This approach will reduce the burden on municipalities and should help reduce construction times as the inspectors / overseers will be onsite, reducing the need to coordinate electrical and plumbing inspections. With experience producing residential units, manufacturers should be able to coordinate with municipalities during the planning phase to schedule required construction inspections or reach agreements on the use of third-party inspectors where it is appropriate.

For these reasons, MOCA supports LD 2229 with our suggested amendments. Thank you for your time, and I am happy to answer any questions you may have.

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duplicative inspections by municipalities of electrical and plumbing construction and installation within  
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existing single-family dwelling occupied and owned by that person, as long as the installation conforms with the standards of the National Electrical Code or other standards approved by the board; or

**Sec. 12. 32 MRSA §1201-A, sub-§14** is enacted to read:

**14. Manufactured housing**~~Modular buildings.~~ The installation of electrical systems in buildings when that installation ~~Electrical installations in manufactured housing as defined in Title 10, section 9002, subsection 7,~~ when is performed by a regular employee of a manufacturer licensed under Title 10, chapter 951, as long as a Maine licensed master electrician employed by the manufacturer either supervises or inspects the installation in the manufacturing facility. The name and license number of the master electrician must be documented on the inspection report of the master electrician. Reports shall be submitted to the municipality in which the modular structure is erected.

**Commented [SH4]:** Addresses factory workers being able to install, instead of hiring licensed trades, as long as a licensed master electrician inspects. Does not change requirements for licensed trades work at the site for connections and other local work.

**Sec. 13. 32 MRSA §3302, sub-§1, ¶C**, as amended by PL 2017, c. 210, Pt. D, §3, is further amended to read:

C. Plumbing by a person in a single-family residence occupied or to be occupied by that person as that person's bona fide personal abode as long as the installation conforms with board laws and rules; ~~and~~

**Sec. 14. 32 MRSA §3302, sub-§1, ¶D**, as enacted by PL 2017, c. 210, Pt. D, §3, is amended to read:

D. Plumbing by a pump installer who is duly licensed pursuant to section 4700-I, subsection 2, except that this exception is limited to installing piping from the cold water distribution pipe at the pressure tank's main shut-off valve to the existing water supply piping as long as the piping is located in the same room as the tank, the length of the piping is no longer than 15 feet and the piping does not extend beyond any existing branches. Such plumbing must conform to the board's laws and rules; ~~and~~

**Sec. 15. 32 MRSA §3302, sub-§1, ¶E** is enacted to read:

~~E. Plumbing in manufactured housing as defined in Title 10, section 9002, subsection 7~~The installation of plumbing in buildings, when performed by a regular employee of a manufacturer licensed under Title 10, chapter 951, as long as a Maine licensed master plumber employed by the manufacturer either supervises or inspects the installation in the manufacturing facility. The name and license number of the master plumber must be documented on the inspection report of the master plumber. Inspection reports shall be submitted to the municipality in which the modular structure is erected.

**Commented [SH5]:** Addresses factory workers being able to install, instead of hiring licensed trades, as long as a licensed master plumber inspects. Does not change requirements for licensed trades work at the site for connections and other local work.

**Emergency clause.** In view of the emergency cited in the preamble, this legislation takes effect when approved.

**SUMMARY**

This bill is reported out by the Joint Standing Committee on Housing and Economic Development pursuant to Resolve 2025, chapter 105. The committee has not taken a position on the substance of this bill. By reporting this bill out, the committee is not suggesting and does not intend to suggest that it agrees or disagrees with any aspect of this bill. The committee is reporting the bill out for the sole purpose of having a bill printed that can be referred to the committee for an appropriate public hearing and subsequent processing in the normal course.

The bill allows an individual to make an electrical installation or plumbing installation, without a license under the Maine Revised Statutes, Title 32, chapters 17 and 49, respectively, when the installation is made during the construction of manufactured housing in compliance with Title 10, chapter 951 and under the supervision of or inspection by a master electrician or master plumber, respectively. The bill eliminates

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**Emergency preamble.** Whereas, acts and resolves of the Legislature do not become effective until 90 days after adjournment unless enacted as emergencies; and

**Whereas,** there exists uncertainty across the State about the role of the State and local units of government over the standards for and inspection of the electrical and plumbing components of ~~manufactured housing~~ modular buildings not certified by Title 10, chapter 951 that are constructed and installed in accordance with the ~~manufactured housing laws~~ Maine Uniform Building and Energy Code; and

**Whereas,** ~~duplicate inspections delay the installation and occupancy of manufactured housing at a time when the State is experiencing a significant housing crisis; and~~

**Whereas,** in the judgment of the Legislature, these facts create an emergency within the meaning of the Constitution of Maine and require the following legislation as immediately necessary for the preservation of the public peace, health and safety; now, therefore,

Be it enacted by the People of the State of Maine as follows:

**Sec. 1.** ~~10 MRSA §9042, sub-§3-A~~ is enacted to read:

~~**3-A. Electrical and plumbing installation.** Electrical installations performed in accordance with Title 32, section 1201-A, subsection 14 are not subject to inspection by or on behalf of a municipality at the location where the manufactured housing will be affixed to real property. Plumbing installations performed in accordance with Title 32, section 3302, subsection 1, paragraph E are not subject to inspection by a municipality or 3rd party inspector at the location where the manufactured housing will be affixed to real property.~~

**Sec. 2.** ~~30-A MRSA §4152, sub-§6~~, as enacted by PL 1987, c. 737, Pt. A, §2 and Pt. C, §106 and amended by PL 1989, c. 6; c. 9, §2; and c. 104, Pt. C, §§8 and 10, is further amended to read:

~~**6. Electrical equipment in manufacturer's plant.** Any electrical installations or equipment involved in the manufacture, test or repair of electrical equipment in the manufacturer's plant; and~~

**Sec. 3.** ~~30-A MRSA §4152, sub-§7~~, as enacted by PL 1987, c. 737, Pt. A, §2 and Pt. C, §106 and amended by PL 1989, c. 6; c. 9, §2; and c. 104, Pt. C, §§8 and 10, is further amended to read:

~~**7. Certain laboratories.** Installations in suitable laboratories of exposed electrical wiring for experimental purposes only; and~~

**Sec. 4.** ~~30-A MRSA §4152, sub-§8~~ is enacted to read:

~~**8. Certified manufactured housing.** Installations in manufactured housing certified under Title 10, chapter 951 and rules adopted under that chapter.~~

**Sec. X.** ~~30-A MRSA §4172, sub-§1~~ is enacted to read:

**1. Modular buildings excluded.** This section does not apply to the installation of electrical systems in buildings when that installation is performed in a factory that is licensed under Title 10, Chapter 951.

**Commented (SH1):** This section addresses municipal inspections for electrical work.

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**Sec. 5. 30-A MRSA §4173, sub-§1-A** is enacted to read:

~~1-A. **Manufactured housing** Modular buildings excluded. This section does not apply to manufactured housing constructed or installed in compliance with Title 10, chapter 951 and rules adopted under that chapter.~~

**Sec. 6. 30-A MRSA §4215, sub-§1, ¶A**, as enacted by PL 1987, c. 737, Pt. A, §2 and Pt. C, §106 and amended by PL 1989, c. 6; c. 9, §2; and c. 404, Pt. C, §§8 and 10, is further amended to read:

~~A. The installation of plumbing into a building, except manufactured housing constructed and installed in compliance with Title 10, chapter 951 and rules adopted under that chapter;~~

**Sec. 7. 30-A MRSA §4221, sub-§4, ¶B**, as amended by PL 2009, c. 344, Pt. D, §6 and affected by Pt. E, §2, is further amended to read:

B. Installation of domestic heating appliances by master oil and solid fuel burning technicians licensed pursuant to Title 32, chapter 139; and

**Sec. 8. 30-A MRSA §4221, sub-§4, ¶C**, as enacted by PL 2003, c. 304, §1, is amended to read:

C. Installation of stand-alone water meters, water meters in combination with nontestable backflow prevention devices and related valves by water utility personnel or water utility contractors. The water utility shall include in any notice it provides to a customer regarding entry to install such a meter or related valves a statement that installation of a backflow preventor may necessitate installation by the customer of additional devices, such as an expansion tank, due to thermal expansion; and

**Sec. 9. 30-A MRSA §4221, sub-§4, ¶D** is enacted to read:

~~D. Installation of plumbing in manufactured housing certified under Title 10, chapter 951 and rules adopted under that chapter buildings when that installation is performed in a factory that is licensed under Title 10, Chapter 951.~~

Commented [SH2]: Addresses municipal plumbing inspections

**Sec. X. 32 MRSA §1102-C, sub-§3,A** is enacted to read:

~~A. **Modular buildings excluded.** This section does not apply to the installation of electrical systems in buildings when that installation is performed in a factory that is licensed under Title 10, Chapter 951.~~

Commented [SH3]: This section addresses state inspections for electrical work.

**Sec. 10. 32 MRSA §1201-A, sub-§12**, as amended by PL 2025, c. 88, §3, is further amended to read:

12. **Incidental work.** Regular employees of an owner or a lessee of real property doing incidental electrical work on that property or incidental electrical work by a person whose occupation involves miscellaneous jobs of manual labor. For purposes of this subsection, "incidental electrical work" means minor electrical work, limited to light fixtures and switches, that occurs by chance and that does not require electrical installation calculations; or

**Sec. 11. 32 MRSA §1201-A, sub-§13**, as enacted by PL 2025, c. 88, §4, is amended to read:

13. **Personal abode.** Notwithstanding the requirements set forth in section 1102-D for electrical installations in newly constructed single-family dwellings, a person making electrical installations in an