

Testimony of Industrial Energy Consumer Group
In Opposition to
LD 1969, *An Act Concerning Equity in Renewable Energy Projects and Workforce*
Development
Before the Joint Standing Committee on Labor and Housing
February 28, 2022

Senator Daughtry, Representative Sylvester, and members of the Joint Standing Committee on Labor and Housing; I am Steven Hudson, an attorney with the law firm of Preti Flaherty, here today to provide testimony on behalf of Industrial Energy Consumer Group (IECG) in limited opposition to LD 1969, *An Act Concerning Equity in Renewable Energy Projects and Workforce Development*. As members of this committee may know, IECG is an association of large energy consumers in Maine that advocates at the state, regional and federal level for rapid and efficient climate mitigation while assuring reliability and low costs for all consumers.

Many of our members either currently have or are examining renewable energy generation at their sites. They do so for many reasons, but the overarching reason is to serve their internal needs. No industrial customer intentionally installs more generation than their operations require. Most that have any significant sales to the grid do so due to unplanned interruptions in operations and such sales are a method to avoid further costs and emissions by shutting down and then starting up onsite generation. Maintaining consistent energy operations over time maximizes the efficiency of industrial production.

IECG views LD 1969 as primarily aimed at commercial generators who receive state assistance to primarily sell their output to third parties. Such are not IECG members or industrial consumer-generators in general. The bill as currently drafted would include some, and perhaps over time most, of IECG members. IECG suggests that an amendment exempting renewable projects located fully on the customer side of the utility meter would be one way to address IECG's concerns with the bill as printed.

IECG also notes that all of its members industrial consumer-generators currently operate with one of more collective bargaining agreements in place. As this committee is aware, such agreements represent the bargained-for relationship between a company and its labor workforce. IECG believes that such voluntary bilateral labor agreements should be respected.

Thank you for the opportunity to provide testimony on this bill. I would be happy to answer any questions now or at the work session.