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Commissioner Dan Burgess
Maine Department of Energy
Burton Cross Building, 3rd Flr.
111 Sewall St.
Augusta, ME. 04330

March 31, 2026

Re: Comments on Draft RFP for Energy Storage Systems (35-A M.R.S. §10313)

Dear Commissioner, Burgess,

On behalf of the International Brotherhood of Electrical Workers Second District, I submit the following comments regarding the Draft RFP for 200–300 MW of new battery energy storage systems. This procurement represents a major construction and long-term operations opportunity for Maine’s electrical workforce.

The report prepared for the IBEW outlines that battery storage projects require extensive high-voltage electrical installation, substation work, SCADA integration, fire protection systems, and long-term O&M staffing. As noted in the analysis, *“Battery energy storage projects require substantial skilled electrical work across multiple phases,”* and these projects will impact all three Maine locals—104, 567, and 1253—due to the statewide distribution of grid infrastructure.

The Draft RFP correctly recognizes the importance of workforce quality by rewarding projects that maximize federal tax credits through labor agreements. Under the Inflation Reduction Act, developers can secure an additional 10% tax credit—often exceeding \$10 million per project—by meeting prevailing wage and registered apprenticeship requirements. This creates a direct financial incentive for developers to use trained, union labor.

However, the Draft RFP does not yet include the workforce standards necessary to ensure safe, reliable, and cost-effective project delivery. The report identifies several gaps, including the absence of mandatory prevailing wage requirements, apprenticeship utilization standards, contractor qualification criteria, and labor compliance monitoring. Without these provisions, Maine risks low-road contracting practices on projects involving high-voltage electrical systems and complex battery technologies.

To protect ratepayers, ensure public safety, and maximize federal incentives, we respectfully urge DOER to strengthen the final RFP by:

- Requiring prevailing wage and registered apprenticeship utilization
- Establishing minimum qualifications for electrical contractors
- Incorporating project labor agreements for large projects
- Setting clear O&M workforce standards for the 20-year contract term
- Implementing labor compliance reporting and enforcement mechanisms

These measures will ensure that Maine's investment delivers high-quality projects, long-term reliability, and good jobs for Maine workers.

Thank you for the opportunity to comment. The IBEW stands ready to work with DOER to ensure that Maine's clean-energy future is built and maintained by a skilled, safe, and local workforce.

Sincerely,

Michael Monahan

Michael Monahan
IBEW International Vice President
Second District