NECA NATIONAL ELECTRICAL CONTRACTORS ASSOCIATION
GREATER BOSTON CHAPTER
Our Network Builds Yours

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Energy Transformation Advisory Board
Melissa Lavinson, Executive Director
Office of Energy Transformation
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Boston, MA 02114

July 23, 2026

Re: High-Road Labor, Employer, and Community Standards in ETAB Recommendations

Dear Members of the Energy Transformation Advisory Board,

On behalf of NECA Greater Boston, we would first like to thank Governor Healey, Secretary Tepper, Executive Director Melissa Lavinson, and the Commonwealth's dedicated staff for convening the Energy Transformation Advisory Board (ETAB) and advancing this important work. It has been a privilege to participate in the process.

NECA Greater Boston represents the electrical contracting businesses that build, connect, and maintain the Commonwealth's grid, energy storage, and clean energy infrastructure. Together with IBEW Local 103, our contractors sustain the registered apprenticeship and training system that prepares the registered apprentices and licensed electricians upon whom this work depends. We submit these comments on behalf of these contractors and their employees to help ensure that ETAB's recommendations support the responsible development and construction capacity required to implement the Commonwealth's clean energy transition.

ETAB's work is especially timely as the House and Senate work to reconcile their respective energy bills. The Board's recommendations can help ensure that the resulting legislation reflects the lessons developed through this process.

As ETAB closes out several of its initial Focus Area Work Groups, continues the Enabling Sustainable Economic Development Group, and launches the Peak Energy Demand Reduction Group, we encourage the Board to carry four overarching principles across its remaining recommendations and work.

First, ETAB should adopt high-road contractor and labor standards that support a just transition. Prevailing wage and registered apprenticeship should be expressly recognized as foundational labor standards, consistent with the work of the Special Commission on Fossil Fuel Workforce.[1] High-road contractors are the employers that hire licensed tradespeople, train the next generation through registered apprenticeship, maintain strong safety records, comply with all labor laws, and deliver projects that meet the highest standards for quality and reliability. Applying these standards across ETAB's recommendations would help ensure that the transition creates durable career pathways while supporting the contractors and workforce needed to perform this work safely, competitively, and at scale.

Second, ETAB should build upon the 2024 Climate Act by incorporating high-road development and construction practices into clean energy project approvals. Recommendations involving

[1] *Report from the Massachusetts Special Commission to Study the Impacts on the Fossil Fuel Workforce*, December 2025, at 12.

expedited interconnection, entitlement, permitting, financing, or other public support should promote meaningful and measurable benefits for host communities through robust Community Benefit Agreements. These requirements should be consistent with the Office of Environmental Justice and Equity's published Standards and Guidelines for Community Benefit Plans and Agreements[2], as well as the Commonwealth's implementing clean energy siting and permitting regulations.

Third, ETAB should recognize that high-road labor standards are essential to building the contractor and workforce capacity required to achieve the Commonwealth's broader clean energy objectives. Clear and consistent standards provide the market certainty needed for contractors to invest in equipment, training, and business capacity while sustaining a reliable pipeline of registered apprentices and licensed tradespeople.[3] Embedding these expectations in clean energy programs will help the industry keep pace with growing demand while delivering projects to the standards Massachusetts' communities expect.

Lastly, ETAB should recognize that these same standards protect taxpayers across all of this work by helping ensure that Massachusetts captures the full value of the available federal clean energy tax credits. They align Massachusetts projects with the federal prevailing wage and registered apprenticeship requirements generally required to obtain the full value of the tax credits for qualifying larger clean energy facilities and energy storage technologies. This alignment helps projects maximize available federal incentives and guards against the clawback of credits that can result when those requirements are not met, protecting the public investment while supporting the energy storage and generation funding central to the Board's goals.[4]

Massachusetts should establish these principles consistently rather than reconsidering them program by program. A clear and durable framework will help the Commonwealth deliver the clean energy transition quickly, safely, equitably, and at the scale required.

We look forward to continuing to help ensure that Massachusetts' clean energy transition is built to the highest professional standards while delivering meaningful and lasting benefits to communities across the Commonwealth.

Thank you for your consideration, leadership, and public service.

Sincerely,

Kristen Gowin, Executive Manager
National Electrical Contractors Association, Greater Boston Chapter

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[2] Executive Office of Energy and Environmental Affairs, Office of Environmental Justice and Equity, *Standards and Guidelines for Community Benefit Plans and Community Benefit Agreements*, March 2026, at 16–17.

[3] Executive Office of Labor and Workforce Development, *Apprenticeship Expansion in Massachusetts: Strategic Plan*, June 2018, at 2–3.

[4] 26 U.S.C. § 48E; U.S. Internal Revenue Service, *Prevailing Wage and Apprenticeship Requirements under the Inflation Reduction Act*, 2024.