



November 29, 2022

Oregon Building Codes Division
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Oregon Residential Specialty Code Advisory Committee:

The Oregon Solar + Storage Industries Association (OSSIA) is a trade association founded in 1981 to promote clean, renewable, solar technologies. OSSIA members include businesses, non-profit groups, and other solar industry stakeholders.

We provide a unified and respected voice of the solar industry and focus exclusively on the solar value chain; from workforce development to permitting, advocacy, policy, and regulation for residential, commercial, community, and utility scale solar projects on the local, state and regional level.

Many stakeholders - including OSSIA members - helped to create the Oregon Solar Installation Specialty Code that was put into effect in 2010. At the time, the code was a stand-alone code and shining example of collaboration on - and institution of - policy to push Oregon towards a clean energy future. Thirteen years later, though the OSISC has been moved into the OSSC but has remained almost completely intact.

The industry would like to take the opportunity to acknowledge the Building Codes Division for its continued efforts to administer and streamline the processes surrounding all codes - including those that have authority over solar installations. We understand it is complex and dynamic, and appreciate the support of the group over the years.

Moving forward, the Federal Investment Reduction Act, Oregon's HB 2021 Clean Energy legislation and local cities and municipalities climate goals - we are poised to see a significant increase in solar installations across the state. We would like to see Oregon in the best possible position to handle it and, again, be a leader and example for the rest of the nation.

Currently, there is a recommendation put forth to this Oregon Residential Specialty Code Committee and Board to duplicate the OSSC code into the ORSC. OSSIA would like to formally ask for no changes relating to moving OSSC 3111 language into the ORSC at this time. We do have concerns about the duplication of the code and unintended consequences of a change such as this. However, we understand the concerns of the State and agree that there are improvements that could be made.

In order to have a proposal fully informed and supported by the solar industry, we would like to recommend that a Special Task Group be brought together to collaborate on a new and updated code. The goals of this Special Task Group would be to streamline permitting for municipalities, address changes in solar technology, review engineering requirements, and plan for ORSC versus OSSC code placement that would better support the BCD and all authorities administratively. OSSIA feels a



process like this would be less disruptive to solar installations, at a time when installations are increasing exponentially.

An example of the process we are proposing came out of Washington State in 2014. Stakeholders came together to create and approve an emergency rulemaking order to allow for streamlined permitting and installation of standard solar photovoltaic systems on residential rooftops. Using both current national studies and historical data, the group was able to create a safe and efficient system to support both authorities and the industry.

In conclusion, we encourage the ORSC Code Advisory Committee and the Oregon Building Codes Division to take the opening of this solar code conversation, as well as Washington's example, as an opportunity to update and improve the code. Taking the topic to a specialized and focused group will give ample time and opportunity to usher in a collaborative answer to Oregon's next generation of solar.

Respectfully submitted this 29th day of November,

A handwritten signature in black ink, appearing to read "Jack Watson", is written over a light blue circular stamp.

Jack Watson
Director of Policy and Regulatory Affairs
Oregon Solar + Storage Industries Association