



Construction Industry Energy Board and
Residential and Manufactured Structures Board

RE: June 9th meeting and Solar Ready Construction

June 8th, 2020

Construction Industry Energy Board and Residential and Manufactured Structures Board,

Thank you for considering our comments. Oregon Solar Energy Industries Association is a trade association founded in 1981 to promote clean, renewable, solar technologies. OSEIA members include businesses, non-profit groups, and other solar industry stakeholders with extensive experience in solar design and installation.

The provisions being considered for an interim amendment as documented in section N1107.4 (page 49 of the published agenda) are a step toward solar-ready provisions but are incomplete. Solar ready requirements must also incorporate elements of unobstructed rooftop space, solar resource (a function of tilt, orientation, and shading), access and clearances for equipment, electrical panel layout and other specific installation considerations.

Appendix U of the International Residential Code (IRC) provides a thorough set of requirements ensuring new construction is solar-ready and results in cost effective installations with higher levels of clean electricity production. We recommend that your boards consider this as a standard from which our state codes could be based.

The interim amendment, as presented, could result in homes being constructed that, while touted as solar ready, may not accommodate a solar installation at all. This outcome would neither meet the goals related to EO 17-20 nor save money for solar system owners in the future.

We would welcome the opportunity to support your efforts in developing sound, effective solar ready building codes that result in high performing, lower cost solar installations for Oregonians. In order to accommodate time for input from knowledgeable stakeholders and in consideration of COVID-19 related delays, we also ask that you consider postponing adoption of solar ready provisions, perhaps commensurate with the April 1, 2021 BCD code adoption date.

Thank you for your time, please let me know if we can be of assistance.

Sincerely,

Shannon Souza, PE
Board Director, Policy Chair