



Aug 16rd, 2020

RE: **8/17/20 Code Committee Meeting - Residential Solar Ready Provisions**

Dear Technical Model Code Review Committee,

Thank you for receiving my comment, again. For the record, my name is Zach Snyder and I am Program Manager at Solar Oregon, a statewide nonprofit that has educated consumers and the general public about solar and other forms of clean energy for the past four decades.

On August 3rd, this committee discussed proposed solar ready provisions, including the Appendix T of the model code (attached). At that meeting Solar Oregon voiced its support for the model Appendix T solar ready provisions as a strong, holistic solar ready. Some modifications were suggested by committee members, but they were minor and well reasoned.

In preparation for today's meeting, Building Codes Division staff have suggested a significantly modified and reduced version of Appendix T, which I will refer to here as the 'BCD staff suggestions' (attached). These BCD staff suggestions--while certainly well intentioned--create unnecessary hurdles for builders, and represent a solar ready that falls short of what is needed to live up to its namesake. In particular, it condenses several sections of the model Appendix T into a single section that is difficult to parse, and I believe will be confusing for builders. In addition, it eliminates an important exception (exception #2 of T103.1 of the model Appendix T), and instead in the revised T103.2 seems to exempt all projects that don't have "600 square feet of contiguous roof area, located on a single roof plane, oriented in a single direction other than north".

The Energy Trust of Oregon has submitted to this committee its own suggested solar ready language (attached), which I will refer to here as the 'Energy Trust suggestions'. These suggestions represent a very robust and well thought out solar ready, and I propose that they be considered by the committee in their entirety. They incorporate the small modifications of the model Appendix T that were suggested by committee members on August 3rd. The Energy Trust suggestions allow for builders to certify whether their project is exempt based on well defined and time-tested criteria, without significant burden. They also do not condense the language of the model Appendix T, and so retain their clarity. Finally, they incorporate additional modifications requested by committee members and BCD staff, including allowing plumbing outlets in the solar-ready zone and the use of MC Cable in lieu of nonflexible metal raceway.

Solar Oregon strongly urges the committee to adopt the Energy Trust suggested language as a strong, well thought out solar ready. In addition, I believe that the Building Codes Division has the authority to implement these codes as part of the planned residential code update. Implementation on October 1st, outside of the normal code cycle, is unnecessary and will make extra work and stress for builders. Thank you for your attention to this important matter.

Sincerely,

Zach Snyder