From: Renewable Energy Vermont (REV)

To: Senator White, Chair of Senate Committee on Government Operations

Date: Tuesday, March 11, 2014

Re: S.261, An Act Relating To Electrical Installations

Dear Chair,

REV appreciates the good work being done here regarding electrical installations and has a few modest amendments that we believe will be favorable to all parties affected by this bill. We request that the bill be amended as follows, though we recognize that the specific language must be considered and accepted by Legislative Counsel.

(1) At page 4, line 13, add:

"(7) Installation of solar electric systems, including modules, racking, inverters, and the balance of the system on freestanding single family and two family dwellings up to and including the point of connection with the existing electrical system, that connection being one or more back fed breakers in an existing breaker panel."

This language allows installers to continue doing the work that they currently perform. Solar installers understand the technical and operational requirements and guidelines for such installations. This language provides a clear dividing line between the solar installation components and the existing residential components – a line that both solar installers and electricians currently understand and respect.

(2) At page 4, line 19, add after "procedure":

"and provides in-state course opportunities that may be necessary to meet the test requirements."

This language would allow for in-state educational opportunities – protecting S-license applicants from the possibility that they would have to travel significant distances (e.g. to the Boston or NYC areas) in order to gain the educational background to pass the licensing test.

- (3) This bill may be improved with clarification about what an S-License allows. REV proposes that an S-License be defined consistent with the following:
- A. S-license allows an installer to perform any modifications necessary to interconnect a renewable energy system to the electrical grid (e.g. a line-side tie) on any installation not associated with a complex structure
- B. S-license allows an installer to perform work up to point of interconnection on a complex structure.