

Department of Labor and Training and Office of Energy Resources – Questions and Answers on Solar Installations

1. As the renewable energy market expands in Rhode Island what can DLT inspectors do while on site?

The type of project does not affect the inspection rights of DLT inspectors provided by law. Inspectors will continue to carry out inspections according to the applicable trade licensing law.

2. For the small commercial PV installations the jobs ratio is 3 electricians to one apprentice, correct. Is that ratio different for small business or residential solar installations?

Apprenticeship ratios are based on the type of project and by trade not the size of the contractor. The ratio for electrician apprentices on residential projects is 1 apprentice per 1 journeyman. The ratio for electrician apprentices on commercial or manufacturing/shop projects is 1 apprentice per 1 journeyman for the first apprentice and then 1 apprentice per 3 journeymen for each additional apprentice. A complete list of apprenticeship ratios for each trade is included as Appendix A of the Apprenticeship Rules and Regulations, which can be found online at: <http://www.dlt.ri.gov/apprenticeship/pdfs/ApprenRRs1113.pdf>

3. Can an individual who is involved with a small scale PV project, works for a solar installation company with a Renewable Energy Professional Certificate, and is not an electrician cut a rail to size for the project on the jobsite? What about in the warehouse? Can they put the rail in place on the jobsite?

Renewable energy professionals can cut a rail to size on the jobsite and at a warehouse location and can bring the rail to the final location of installation. However a licensed electrician must install the rails at the final location of installation.

4. What preparation work can be done to installation materials before taking them to the job site? What can be done on-site?

The location at which work is performed does not affect the application of the statute. For example, mounting modules to the mounting rack must be performed by a licensed electrician regardless of where the work is performed.

5. Can flashing be done by a non-licensed electrician?

Yes.

6. When there are multiple crew members on a commercial PV jobsite should workers have distinct colored shirts or vests distinguishing electricians and non-electricians on the site?

Licensed electricians are required by law to carry their license while on the jobsite. Any other method used to distinguish between electricians and non-electricians is at the contractor's discretion.

7. What happens if the racking for the solar panels can only be installed by trained contractors associated with the solar racking company, in order for the warranty to be guaranteed for the system? What happens if electricians do not have proper training from the solar racking company that the solar business needs to install the system?

Solar racking systems must be installed by licensed electricians. It is the responsibility of each business to comply with the DLT policy regarding R.I.G.L. §5-6-8 (g). The strategy used by a business to achieve compliance is at the business' discretion.

8. Can DLT and OER provide a table showing all aspects that can be done on the job site by electricians and the same for general contractors and non-electricians?

Renewable Energy Electrical Work (Licensed)	Renewable Energy Ancillary Non-Electrical Work
<ul style="list-style-type: none"> • Install <ul style="list-style-type: none"> ○ Electrical Wires ○ Conduits ○ Apparatus (including racking systems) • Connect <ul style="list-style-type: none"> ○ Electrical Wires ○ Conduits ○ Apparatus (including rack systems) • Maintain <ul style="list-style-type: none"> ○ Electrical Wires ○ Conduits ○ Apparatus (including rack systems) • Service <ul style="list-style-type: none"> ○ Electrical Wires ○ Conduits 	<ul style="list-style-type: none"> • Install <ul style="list-style-type: none"> ○ Ground and/or rooftop support brackets for racking systems ○ Ground and/or rooftop support ballast for rack systems, i.e. cement blocks • Distribute materials to final location of installation <ul style="list-style-type: none"> ○ Place PV modules onto the rack system • Advertise services • Excavation and trenching related work relating for preparation of the ground mount system (hoisting license requirements may apply) • Pre and post landscaping of the installation area

<ul style="list-style-type: none"> ○ Apparatus (including rack systems) • Test <ul style="list-style-type: none"> ○ Electrical Wires ○ Conduits ○ Apparatus (including rack systems) • Mount modules to the mounting racks • Mount inverters • Tie inverters into the main electrical panels 	
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9. Will the solar installer and electrical communities have the opportunity to provide comments on OER/DLT drafted responses to the questions posed at the solar stakeholder meeting today? Will there be a follow up meeting with stakeholders?

Contractors with specific questions regarding the application of the trade licensing laws should contact the Department of Labor and Training directly for assistance.

10. Can non-licensed individuals (apprentices or laborers) and those solar companies having the Renewable Energy Professional Certificate (REPC) issued by DLT and OER place the solar modules onto the rack system when delivering the solar module materials to the commercial or residential job site, and then the licensed electricians secures/connects the solar modules to the rack system and then completes all of the electrical wiring and inverter work. Is this scenario correct?"

Yes, that would be permissible.