# Independent Electrical Contractors of New England, Inc.

TO: Energy & Public Utilities Committee

From: Lisa Hutner, Executive Director

Date: March 9, 2010

**RE: HB-5467 - AN ACT CONCERNING THE COORDINATION OF ENERGY EFFICIENCY PROGRAMS**

The Independent Electrical Contractors of New England (IEC-NE) strongly supports efforts to provide incentives to homeowners and business to move to more energy efficient products and appliances. Many of our customers are looking to incorporate solar photovoltaic (PV) technologies into their homes, schools and businesses to reduce their energy costs. In addition to saving money, more and more individuals simply want to "go green" by utilizing solar and other energy efficient products.

As an industry, electrical contractors have embraced this movement and many have taken steps to become "Qualified Installers" under the Connecticut Clean Energy Fund solar PV incentive programs. However, as currently administered, the current program creates barriers for licensed electricians to become Qualified Installers under this program.

Under current law, licensed electricians holding the E-1 and E-2 electrical licenses are duly authorized to perform solar PV work. This has been confirmed by the state Department of Consumer Protection and acknowledged by the Connecticut Clean Energy Fund. However, in order to become a "Qualified Installer" an individual must be an installation supervisor who has taken a PV installation training course and has completed at least three installations as the lead installer or ten installations as an apprentice.

This is an arbitrary and unnecessary requirement as it pertains to E-1 and E-2 electricians. Again, a licensed electrician is already authorized to perform solar PV work. In order to become a licensed electrician, an individual must complete an 8,000 hour (four-year) apprenticeship training program and related classroom instruction. Training in solar PV has been incorporated in the electrical apprenticeship training program. In addition, licensed electricians are required to complete a minimum of 7 hours per year of continuing education, which also includes information on solar PV and building code changes relative to solar PV.

Last year, we raised these issues with representatives of the Connecticut Clean Energy Fund. In response, CCEF created a "Provisional Installer" status. In order to obtain "Provisional Installer" status, a PV-1 or an E-1 licensed electrician must install 3 systems subject to review by CCEF.

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Although we appreciate CCEF's efforts to address this, the "Provisional Installer" status has proven difficult. Some of our members have pursued this status and found it very difficult and time-consuming to get through the process to become a "Qualified Installer".

Building projects and renovations which may include the installation of a solar PV system generally take several months to complete. Therefore, it will be several months or years before 3 systems have been completed for review by CCEF, particularly given that the program is sometimes suspended for lack of funds. In addition, given the high cost of a solar PV installation, customers are not willing to gamble on whether or not the project will be approved by CCEF and eligible for the rebate. Even the term "Provisional Installer" somehow implies that the contractor lacks the needed training and skills.

We therefore believe that the "provisional installer" status has not proven to be a workable or necessary alternative, particularly given the already comprehensive training that electricians receive in electrical wiring, grounding and other electrical work that is critical to the successful installation of a solar PV system. Licensed electricians are qualified by the state to work on any type of electrical system, including systems in nuclear power plants and manufacturing. None of those applications requires additional training and experience in order to work in that capacity.

In addition, CCEF is now requiring all contractors to have at least one permanent employee successfully complete and pass the NABCEP entry level PV exam. Although NABCEP is considered a suitable training program, we believe that mandating this requirement is unnecessary. Again, licensed electricians receive adequate training in solar PV under their apprenticeship training program and continuing education requirements. In addition, many solar panel manufacturers require electricians to be certified under their program to install their product or have already taken programs at the state's community colleges or from other providers relative to solar PV.

**We believe that the law should recognize the scope of work authorized by the electrical license and ensure that licensed electricians can participate in solar PV incentive programs without the additional training and experience requirements imposed under the "provisional installer" status.**

Requiring licensed electricians to meet unnecessary training and experience requirements have hindered opportunities for Connecticut contractors to compete for solar PV jobs in Connecticut. In order to support the growth of green jobs in the solar industry, we believe these issues should be addressed.

Thank you for your consideration of these recommendations.

*The Independent Electrical Contractors of New England is the premier trade association representing Connecticut, Massachusetts and Rhode Island independent electrical contractors aggressively working with the industry to establish a free environment for merit shop -- a philosophy that promotes the concept of free enterprise, open competition and economic opportunity for all.*

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