



# Independent Electrical Contractors of New England, Inc.

TO: Program Review & Investigations Committee

From: Lisa Hutner, Executive Director

Date: March 1, 2010

**RE: H. B. No. 5164 (RAISED) AN ACT IMPLEMENTING THE RECOMMENDATION OF THE PROGRAM REVIEW AND INVESTIGATIONS COMMITTEE CONCERNING THE ALIGNMENT OF POSTSECONDARY EDUCATION AND EMPLOYMENT IN THE GREEN INDUSTRY**

Thank you for the opportunity to comment regarding training and employment in the green industry, specifically solar photovoltaic.

In reviewing the committee's report, we noticed that the information regarding solar photovoltaic (PV) licensing does not indicate that licensed E-1 and E-2 electricians are currently authorized to perform solar PV installations. In fact, the state Department of Consumer Protection has confirmed that solar photovoltaic installations are within the scope of the E-1 and E-2 licenses and incorporated into the four-year apprenticeship training program that one must complete in order to be eligible to obtain an E-1 or E-2 license. *We believe the report should be revised to clarify this.*

We also believe that the committee should address concerns with the administration of the Connecticut Clean Energy Fund's solar PV incentive program in order to support the growth of green jobs in the solar industry. As currently structured, Connecticut's energy efficiency programs create barriers for Connecticut's skilled tradespeople to become eligible as certified installers. As indicated, under current law, E-1 and E-2 electrical license holders are duly authorized to perform solar PV work. However, the Connecticut Clean Energy Fund requires licensed electricians to meet unnecessary training and experience requirements which have hindered opportunities to compete for solar PV jobs in Connecticut.

In addition, several of our members have pursued approval as a "Qualified Installers" or "Provisional Installers". Under the program, a "Qualified Installer" is 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 requirement, particularly as it pertains to E-1 and E-2 electricians. Again, an E-1 and E-2 electrician is already authorized to perform solar PV work. In addition, allowing an individual who has served as an apprentice on 10 installations to become a certified installer is arbitrary inasmuch as an

1800 Silas Deane Highway, Rear Building, Rocky Hill, CT 06067  
(860) 563-4953 Fax (860) 563-5453 Toll Free (866) GO IEC NE  
Email: [lisa@iecne.org](mailto:lisa@iecne.org) [www.iecne.org](http://www.iecne.org)

apprentice may not have gained any significant experience in solar PV or electrical grounding and wiring, depending on how far along in their apprenticeship they were.

To address these disparities, 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. Inasmuch as licensed electricians are already authorized by the state Department of Consumer Protection to install solar PV systems, this requirement is unnecessary for E-1 license holders. In addition, given the high cost of solar PV systems, a homeowner is not going to choose to have a system installed by an installer where the installation will not be eligible for the rebate.

**We therefore recommend the inclusion of language in the bill which provides that a properly licensed electrician is authorized as a qualified installer for purposes of the Connecticut Clean Energy Fund program.**

In addition, CCEF is now requiring all PV contractors to have at least one permanent employee successfully complete and pass the NABCEP entry level PV exam. All provisional installation contractors will be required to complete the NABCEP entry level certificate exam before final approval to the CCEF approved eligible installation contractor list. Although NABCEP is considered a suitable training program, other relevant training programs, such as those offered by the state's community colleges, should also be considered.

**We therefore recommend the inclusion of language in the bill which directs CCEF to recognize the validity of solar PV training programs offered by the state's public institutions.**

Thank you for your consideration of these recommendations. We look forward to working with the committee to develop a bill that will nurture the growth of green jobs in Connecticut.

*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.*