



DOCKET 07-SB-1	
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California Energy Commission
Dockets Office
Re: Docket No. 07-SB-1
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

October 12, 2007

Re: Comments on Guidelines for California's Solar Electric Incentive Programs

The Tile Roofing Industry (TRI) Association submits the following comments regarding the Draft Guidelines for California's Solar Electric Incentive Programs Pursuant to Senate Bill 1 and thanks the CEC for its ongoing work on SB-1. The Tile Roofing Institute (TRI) is a non-profit association of producers, roofers and associates of concrete and clay tile and is considered one of the leading experts in the industry. TRI has long been the industry's voice for code development and testing.

We have heard concerns from some of our constituents regarding the Draft Guidelines for California's Solar Electric Incentive Programs Pursuant to Senate Bill 1. Specifically that the SB-1 draft document does not include a provision for the roofing contractor (C-39) to install BIPV and traditional solar panels. We would also like to call to your attention risks associated with non-roofer trades installing roofing products and the potential for future leaks.

The current New Solar Homes Partnership guidebook published this July clearly states that a C-39 roofing contractor can place (install) solar panels.

Installation contractors must have an active A, B, C-10, or C-46 license. Contractors with roofing specific licenses may place PV panels in accordance with limitations of their specific licenses; however electrical connections must be made by an above-mentioned contractor.

The proposed draft documents for SB-1 do not appear to include a similar provision for roofers to install panels. We have reviewed the installation sections of both the proposed documents Guidelines for California's Solar Electric Incentive Programs Pursuant to Senate Bill 1 published September, 2007 and Eligibility Criteria and Conditions for Incentives for Solar Energy Systems Senate Bill 1 published August, 2007. We cannot find any language that allows roofers to install solar panels, and we

believe this is a serious oversight of the CEC which could drastically reduce the amount and diminish the quality of solar installations in California.

Roof integrated solar products need to be installed by trained, licensed roofing contractors. A, B, C-10 and C-46 contractors are not capable or trained in providing technically sound roof systems, so there is great risk in asking them to install integrated solar panels. C-39 roofing contractors understand and abide by the code requirements in various locations and climate zones in California. We currently have a precedent and existing market for C-39 roofing contractors installing BIPV panels on roofs across California, and the adoption of the proposed draft language could halt many ongoing projects as well as seriously complicate upcoming projects.

The Tile Roofing Institute recommends that the Guidelines for California's Solar Electric Incentive Programs Pursuant to Senate Bill 1 and Eligibility Criteria and Conditions for Incentives for Solar Energy Systems Senate Bill 1 include provisions that allow a C-39 roofing contractor to install solar panels according to Tile Roofing Industry installation guidelines or other code bodies that govern roof installations in California. We would be happy to help with the formal wording of this section of the guidelines.

Thank you for your consideration of our comments.

Sincerely,

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