

DOCKETED

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pp. 10-11, Timing for OSHA UL 61730 NRTL Recognition

Underwriters Laboratories fully endorses the changes proposed by the CEC, however, we wish to alert the team that the timing of a NRTL program for UL 61730 may take longer than January 1, 2020. Underwriters Laboratories has initiated the process to have OSHA augment their NRTL process to include UL 61730-1 and UL 61730-2 for PV module equipment and historically, this process has taken up to 2 years to complete. At this point in time, we are not aware of when the change will be processed and only wish to alert CEC that there may be a gap in time where the NRTL program does not identify UL 61730-2, -2 and this could mean that applicants cannot comply with the written requirements.