



Attn Corporations Committee,

On behalf of Sunwatt Solar I am writing in opposition to House Bill 7015 as it relates to the construction of Ground Mounted and Carport Mounted Solar PV installations.

Sunwatt is a local residential and small commercial Solar EPC headquartered in Pawtucket, RI. We partner with a company called Solar Foundations who engineers and constructs the steel support structures used for small scale solar PV Ground Mounted and Carport Installations.

Solar Foundations engineers, manufactures, and installs ground screw based solar ground mount and carport steel support structures. They install in multiple states and have highly trained crew members fabricating these specialized support structures. Solar Foundation's workers install the support structure and then a licensed electrician completes the rest of the installation; including the installation of grounding lugs, mounting panels, wiring, and all additional aspects required to be performed by a licensed electrician.

It is the Rhode Island residential solar industry's understanding that their work should not fall under the requirements of an electrical license, and they should be allowed to build the *support structure* for the racking system. Based on the previous guidance provided jointly by the DLT and the OER, it is assumed that requirements for licensed electricians do not pertain to solar support systems. The only question would be whether the solar company's electricians would need to physically attach the rails to the top of the support structure.

Sunwatt has installed several Ground Mount projects with Solar Foundations in the past in both Rhode Island and Massachusetts. These solar installations were engineered, permitted, and inspected with no safety issues. In addition, several of the projects fulfilled the required safety standards for the Renewable Energy Fund Grant, Ag Energy Grant, and USDA REAP Grant. The review process for these awards involves an extra level of scrutiny including an onsite inspection by the CADMUS group. No safety issues were noted, and the arrays continue to successfully produce renewable energy at this time without any problems.

Solar Foundations provides a great service to the small-scale solar community in Rhode Island by providing efficient and specific expertise in ground based and structural work, while the solar installer specializes in solar PV. The partnership enables local RI solar installers to confidently sell these types of projects at an affordable cost and with confidence that the steel structures supporting the solar array is engineered and constructed by experts with a record of high safety standards and experience.

The trades involved in the building of these structures are that of machine operator, welder, and steel erector. Solar Foundations has used this partnership model to develop hundreds of successful projects in multiple states without issue. If this legislation were to become law as written, Rhode Island would be the only state where their services would be prohibited. It is perplexing and impractical to ask our limited stock of talented RI electricians to master these trades and not focus on the growing demand for electrical work.

Thank you,

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