



January 25, 2024

The Honorable Joseph J. Solomon, Jr.  
Chairman, House Corporations Committee  
Rhode Island State House  
Providence, Rhode Island 02908

**RE: H7015 - Relating to Businesses and Professions - Electricians**

Dear Chairman Solomon,

PosiGen opposes the current version of H7015 because it would make unnecessary changes to the scope of what is considered electrical and non-electrical work which appears to impact residential rooftop solar installations. We are concerned that these changes could ultimately displace existing workers in the renewable energy industry and create potential labor shortages that would slow rooftop solar deployment and therefore the state's progress towards meeting 100% clean energy by 2033.

We do not know if the intent of the bill is to make changes to requirements for residential rooftop solar systems or only for larger ground-mounted solar systems. If the latter, we would recommend changes be made to the language to make that clear and to avoid inadvertently impacting smaller rooftop systems.

Thousands of rooftop solar systems have been safely installed over the last decade in Rhode Island under the current statutory language and definitions of electrical or non-electrical work provided by the Department of Labor and Training's Workforce Regulation and Safety Division policy advisory 15-01.<sup>1</sup> It is unclear why the current definitions - which are already stringent - are now unsatisfactory.

Currently for rooftop projects, installing the support brackets, distributing system materials, and placing the solar modules onto the racking system (but not mounting or connecting the solar modules) are considered non-electrical work, which is appropriate. Under the proposed language "handling" electrical equipment (i.e. solar modules) and installing "support systems" (which presumably includes both ground-mounts and rooftop support brackets) would be considered electrical work. It would also add unnecessary language about non-electrical work only including distribution of "palletized materials to the final area of installation" which is overly specific and limiting. Simply moving a solar panel from a truck to the roof of a home is not electrical work and should not be defined as such. Having electricians complete a substantial amount of non-electrical work simply drives up prices for consumers while having no impact on safety or quality.

Requiring electrical work to be completed by electricians is important and reasonable. However, it is also critical that such definitions are not overly restrictive to the point that it prevents other workers from entering the renewable energy industry. The clean energy transition to a decarbonized economy will

---

<sup>1</sup> See pages 6 & 7 of [https://dlt.ri.gov/sites/g/files/xkgbur571/files/2023-09/renewenergyapp0118\\_0.pdf](https://dlt.ri.gov/sites/g/files/xkgbur571/files/2023-09/renewenergyapp0118_0.pdf), and this resource provided by the Department of Labor and Training and Office of Energy Resources: <https://energy.ri.gov/sites/g/files/xkgbur741/files/documents/REP/8-18-15---Solar-Installations---Questions-and-Answers-from-DLT-and-OER.pdf>



ultimately create thousands of jobs and we need to make sure there are as many pathways as possible for Rhode Islanders to fill them.

We would appreciate the opportunity to participate in discussion on H7015 if it will be considered further. Please feel free to contact me at [kwallace@posigen.com](mailto:kwallace@posigen.com) or (208) 608-6179.

Respectfully,  
Kyle Wallace  
VP, Public Policy & Government Affairs  
PosiGen, PBC

*PosiGen is a public benefit corporation and certified B corp that provides rooftop solar and energy efficiency services with an emphasis on making solar affordable and accessible to low-and-moderate income communities. PosiGen expanded operations to Rhode Island in 2023 and was selected to be the solar provider of Rhode Island's [Affordable Solar Access Pathways](#) ("ASAP") Program for low-income households. PosiGen has over 25,000 customers and 600 employees across a dozen states.*

