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The Commonwealth of Massachusetts
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Fire Prevention Regulations Appeals Board
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LARRY S. FISHER
CHAIRMAN

Docket # 2025-10
15 Waterville Lane
Shrewsbury, Massachusetts

FIRE PREVENTION REGULATIONS APPEALS BOARD DECISION

A) Statutory and Regulatory Framework

This matter is an administrative appeal filed in accordance with Massachusetts General Laws Chapter 22D, Section 5. The Appellant is seeking the Board of Fire Prevention Regulations' review of a determination of the Shrewsbury Fire Department to reject a proposal for the installation of a solar panel array on a residential, single-family home located at 15 Waterville Lane, Shrewsbury, Massachusetts. The appeal was filed by Lunex Power, Inc., ("Lunex") the contracted solar installer, on behalf of homeowner Saravanan Ramalingam (hereinafter referred to as the Appellant).

B) Procedural History

By notice dated December 22, 2025 and issued by the Shrewsbury Fire Department, the Department rejected a proposal for the installation of a solar panel array on a residential, single-family home located at 5 Waterville Lane, Shrewsbury, Massachusetts. The Shrewsbury Fire Department determined that as proposed, the project is in violation of 527 CMR 1.00, Section 11.12.3.2.3 regarding access pathways, specifically Sections 11.12.3.2.3.1, 11.12.3.2.3.2, 11.12.3.2.3.3 and 11.12.3.2.3.4.

On December 19, 2025¹, the Appellant filed a timely appeal of the Shrewsbury Fire Department's determination with the Fire Prevention Regulations Appeals Board. The Board held a hearing relative to this appeal on March 3, 2026, via video conference.

Appearing on behalf of the Appellant were: Alex McKeon, Lunex Power, Inc. and Dan Gawrych, President and CEO of Lunex Power, Inc. Appearing on behalf of the Shrewsbury Fire Department was Deputy Chief Kevin Weigold and Patricia Sheehan, Building Inspector, Town of Shrewsbury.

¹ The Appellant filed its appeal on December 19, 2025 with e-mail communications from the Shrewsbury Fire Department. Following the filing of the Appeal, the Shrewsbury Fire Department issued a formal Order of Notice, which the Appellant requested be substituted into the record.

Present for the Board were: Larry Fisher, Presiding Chair; Chief Martin Dyer; Keith Pogarian; and Jennifer Hoyt, Alternate. Rachel E. Perlman was the Attorney for the Board.

C) Issue(s) to be Decided

Whether the Board should affirm, reverse or modify the determination of the Shrewsbury Fire Department regarding the proposed solar array installation in accordance with 527 CMR 1.00, Chapter 11?

D) Evidence Received

- | | | |
|----|--|------------|
| 1. | Application for Appeal filed by Appellant | 12/19/2025 |
| 2. | Order of Notice from the Shrewsbury Fire Department | 12/22/2025 |
| 3. | Customer Installation Contract between Lunex Power and Saravanan Ramalingam | 7/31/2025 |
| 4. | Final Construction Control Document | 8/12/2025 |
| 5. | Photovoltaic Roof Mount System Plans for 15 Waterville Lane, Shrewsbury from Lunex | 8/11/2025 |
| 6. | Structural Analysis for the Rooftop PV Solar Installation (22 pages) | 10/22/2025 |

E) Subsidiary Findings of Fact

1. The Appellant sought this Board's review of the Shrewsbury Fire Department's rejection of a proposal for solar panel installation plan for a single-family home located at 15 Waterville Lane, Shrewsbury, Massachusetts. The appeal was filed pursuant to the provisions of M.G.L. c. 22D, s. 5.
2. The Appellant's representative, Ms. McKeown testified that the design plan (Exhibit 5) calls for the installation of 22 solar panels on four (4) separate roof planes. She stated that the panels measure 68.03" x 47.44", for a total of 22.41 s.f. The plan calls for six (6) solar panels on roof planes 1 and 2 and five (5) solar panels on roof planes 3 and 4.
3. Ms. McKeown stated that the plans were rejected by the Shrewsbury Fire Department. However, she was uncertain as to the exact reason for the denial but believed it may be due in part to fire setbacks due to the roof angles and peaks. Ms. McKeown explained that while each plane has two 36 inch fire pathways, the pathways are not perpendicular to the ridge of the roof.
4. In support of the Shrewsbury Fire Department's rejection, Deputy Chief Kevin Weigold testified that the rejection was due to inadequate access for firefighters to the roof. Specifically, the plan is in violation of 527 CMR 1.00, 11.12.3.2.3.2, as it does not have a 36 inch pathway on the driveway side of the structure (identified as Roof #4) and the plans fail to provide the required 36-inch wide access pathway from gutter to ridge for each roof plan that contains a PV array, in violation of 527 CMR 1.00, 11.12.3.2.3.3.

5. Deputy Weigold stated that the lack of access pathways prevent the department from having safe and effective access for ventilation purposes. Further, he explained that the department's standard operating guidelines dictate that a roof ladder must be utilized whenever personnel are operating on a pitch roof to distribute the weight and prevent falls.
6. Deputy Weigold further clarified that the State Fire Code requires access pathways to be oriented perpendicular (vertical) to the roof ridge and to be clear of any obstructions to accommodate standard equipment and ensure safe fireground operations. Based on the plans submitted by Lunex, the access pathways on the north-northeast roof line (identified as Roof # 4) run into each other and would prevent a roof ladder from sitting flat. Further, on the rear of Roof # 4, the proposed access pathway from gutter to ridge lies between a chimney and a skylight.
7. Deputy Weigold also stated that the access pathways on the main portion of the house (identified as Roofs 1, 2 and 3), end at the top of the roof at a ridge and at the bottom at a gutter, which is not allowed by the code.
8. Deputy Weigold further emphasized that in order for ladders to be deployed safely, they must be positioned perpendicular (vertical) to the ridge to secure the ladder hooks over the peak and be clear of any obstructions and stated that if an access pathway is oriented in any other way that prevents the use of a roof ladder, the pathway becomes unusable for emergency operations. Based upon the plan submitted by Lunex, Deputy Weigold does not believe that the plans meet the requirements of the code.
9. In response to a question by a Board member, Deputy Weigold advised that the overall configuration of the roof does not lend itself to using roof ladders, especially on the front of the house, which he stated is required by the Code (11.12.3.2.3.2). As a result, Deputy Weigold advised that he did not believe that solar panels should be placed on this home, which already has limited access due to the roof peaks. He further stated that while the town does have a tower truck, it is not always staffed and did not want to consider that as the primary option for ventilating this roof in case of fire.
10. In response to a second Board question, Deputy Weigold stated that this case is not entirely unique and that he has received similar solar plans and that they have also been rejected.

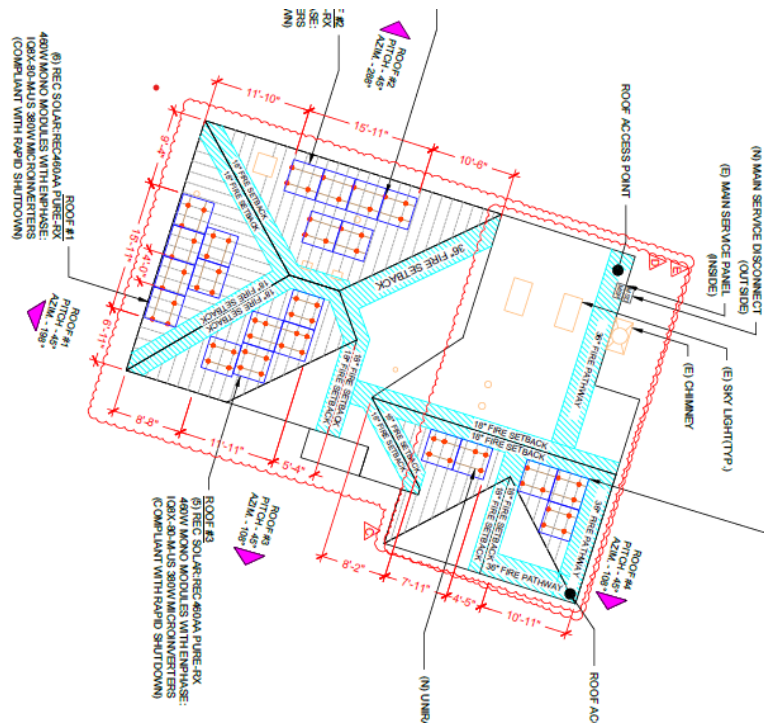
F) Ultimate Findings of Fact and Conclusions of Law

1. The sections of 527 CMR 1.00, Chapter 11 applicable to the subject property are as follows:

11.12.3.2.3.1	Photovoltaic systems installed on one- and two-family dwellings and townhouses shall provide roof access in accordance with 11.12.3.2.
11.12.3.2.3.2	One access pathway shall be provided on the street or driveway side of the roof.

11.12.3.2.3.3 For each roof plane with a PV array, a 36 in. (914 mm) wide access pathway from gutter to ridge shall be provided on the same roof plane as the PV array, on an adjacent roof plane, or straddling the same and adjacent roof planes.

11.12.3.2.3.4 Access pathways shall be located in areas with minimal obstructions such as vent pipes, conduit or mechanical equipment.



2. The Board finds that the proposed plan does not have the minimum required “two 36 in. (914) mm wide access pathways on separate roof planes, from gutter to ridge” in accordance with 11.12.3.2.3.1.
3. The Board finds that because of the existing roof structure, the plan does not include an access pathway on the street or driveway side of the roof in accordance with 11.12.3.2.3.2.
4. The Board also finds that roof plane 4 has the required access pathways on the front and rear. However, roof planes 1, 2, and 3 do not have any access pathways, in violation of 11.12.3.2.3.3. In addition, the location of the access pathways on roof 4, as designed, would be situated between a chimney and a skylight and would be located just above the main service panel and main service disconnect.
5. Finally, the Board finds that while firefighters *could* [emphasis added] deploy ladders across the roof, the roof angles and planes may prevent firefighters from properly securing their ladders over the ridge of the home, which is likely necessary to stabilize a ladder for weight distribution and to prevent firefighters from falling.

G) Decision and Order

Based upon the forgoing reasons, this Board **upholds** the written determination of the Shrewsbury Fire Department regarding the proposed solar plan for 15 Waterville Lane, Shrewsbury, Massachusetts.

H) Vote of the Board

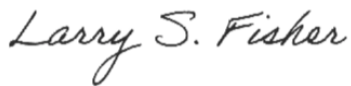
Larry S. Fisher, Presiding Chair
Chief Martin Dyer
Keith Pogarian

In Favor
In Favor
In Favor

I) Right of Appeal

You are hereby advised you have the right, pursuant to Section 14 of chapter 30A of the General Laws, to appeal this decision, in whole or in part, within thirty (30) days from the date of receipt of this order.

SO ORDERED,



Larry S. Fisher, Presiding Panel Member
Fire Prevention Regulations Appeals Board

Dated: April 2, 2026

**A COPY OF THIS DECISION AND ORDER WAS FORWARDED BY E-MAIL AND
CERTIFIED MAIL, RETURN RECEIPT REQUESTED TO:**

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