

## Finlayson, Ian (ENE)

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**From:** Durrenberger, Mark <mark@newenglandcleanenergy.com>  
**Sent:** Wednesday, 27 July 2022 10:24 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** Code conflict with Energy goals  
**Attachments:** Code Modification Request.pdf

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Folks, I'd like to alert you to a conflict with the upcoming IRC 2021 (MA 10th edition building code.)

Section 324.6 of the 2021 IRC calls for roof ridge set backs of solar panels and working paths through solar panels. These sections are the result of first responders claiming they want access to the roof to "vent" during a fire.

Unfortunately, ridge setbacks and working paths will dramatically reduce the number of solar panels that can be installed on a typical residential roof. Depending on roof configuration, solar arrays will be reduced by 30-100%.

Furthermore, reducing the number of solar panels makes achieving net zero quite difficult. It also makes electrification of homes for car charging and electrical heating and cooling difficult.. As it stands now, the 10kw net metering limit serves to limit residential solar arrays. But the House bill H.5060, currently on Gov. Baker's desk, will lift that limit to 25kw. This will dramatically increase the size of solar arrays as more and more home owners strive for net-zero, add electric cars, or add heat-pump based heating and cooling systems.

I've written up a code change request and it is attached. This further details the section of codes that threaten energy production in residential settings.

I have spoken with members of fire services and asked them how often they use roof venting when fighting fires. The answer is "we don't know." We've also asked fire services about venting metal roofs. They've indicated that they "don't go on metal roofs." Which begs the question, If they are willing to make exceptions for metal roofs, why are they requesting such large working paths and ridge access on traditional roofs that have solar panels?

Sincerely,  
Mark Durrenberger

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