



# Town of Norfolk

## BUILDING DEPARTMENT

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**Robert J. Bullock, Jr.**  
**Building Commissioner**

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Massachusetts Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

April 4, 2013

Re: 225 CMR-14.00 Amendments

I applaud the work of the Patrick Administration and its efforts to reduce Massachusetts carbon footprint on the world with renewable energy. I'm in favor of renewable energy sources that reduce our dependence on oil, gas and coal. Feed in Tariff programs such as the RPS Solar Carve-Out regulated by 225 CMR 14 in the Commonwealth are important as we strive to reach grid parity with renewable energy sources. The Commonwealth has made great strides with the current RPS Solar Carve-Out policy. Policy has also created many jobs and increased tax revenue in the State. But with renewable energy development quickly reaching the programs initial capacity of 400MW soon, I recommend that the DOER increase the RPS Solar Carve-Out capacity to 1GW with a opt in term of 10 years; although I feel we must proceed more cautiously with the program in the interest of safety.

I have read the overview for the public hearing on proposed amendments to 225 CMR 14 held on March 22, 2013 regarding the RPS Solar Carve-Out program. I would just like to add an observation to your list as I see it in the real world on the front of the construction and installation of solar photovoltaic systems.

With the incentives that are being infused into the renewable industry by the program, photovoltaic installation companies from across the country are setting up satellite shops within the state. Some of these companies are not performing quality professional workmanship. As Inspector of Wires, I have witnessed many improperly installed solar PV systems by unqualified workers that should not be. I commend the Board of Examiners of Electricians for its support to address proper licensing of installers. But more is needed to be done in the interest of safety. I am aware this is not directly related to your policy at hand, but the result out here in the field is related to public safety.

For this reason, I ask that the DOER in its analysis of policy be responsible for making sure that the RPS Solar Carve-Out program be designed to work in conjunction with other agencies to make sure public safety is equally considered when final policy issues are re-written. I ask for the support of the administration and the DOER to be proactive with economic funding for training of Municipal Inspectional Departments as well as Fire Departments in the Commonwealth of Massachusetts in the industry of solar photovoltaic systems and other renewable energy sources during this review process. If I can express my professional opinion, quality and proper training in the inspectional and first responder field are essential in the industry for the safety of people and property in the Commonwealth. Further, I would have you consider policy options for supporting ongoing training as the technology evolves for the safety of all.

I'm submitting these comments in support of the RPS Solar Carve-Out Program as stakeholder in the interest of public safety.

Respectfully,  
Peter Diamond  
Assistant Inspector of Wires  
Norfolk, Massachusetts