



Commonwealth of Massachusetts, Division of Professional Licensure, Board of State Examiners of Electricians

Public Meeting to consider changes to the Rules and Regulations Governing Electricians and Systems Installers 237 CMR 12.00 to 23.00

Input of Shaun Chapman, Vice President, Policy and Electricity Markets at SolarCity.

Chairman Senopoulos and members of the Massachusetts Board of State Examiners and Electricians:

My name is Shaun Chapman, and I am Vice President for Policy and Electricity Markets for SolarCity. Thank you for the opportunity to provide input before you today.

SolarCity is in the business of installing photovoltaic systems at residential and commercial sites in Massachusetts. We employ more than 500 people in the state at our Agawam, Cape Cod, Fall River, Leominster, Marlborough, Norwell, and Wilmington operations centers. As of February 18, 2015, we have worked with more than 3,500 customers in Massachusetts, most of whom are residential customers.

The solar industry is growing rapidly. Since November 2013, one out of every 78 new jobs created in the U.S. were created by the solar industry. Massachusetts is a great environment in which to sell solar because of the initial investment the state has made to establish the industry.

Earlier this year Governor Baker issued Executive Order 562 initiating a comprehensive review process for all regulations enforced by the Executive Department in order to reduce burdensome regulations and increase efficiency and competitiveness, in an effort to drive job creation, business development and economic growth in Massachusetts.

As the Board examines opportunities to streamline and improve the Rules and Regulations Governing Electricians and Systems Installers, particularly the requirements in 237 C.M.R. 12.00 to 23.00, we ask the Board to consider reviewing labor ratio requirements for solar PV installations.

In its current form, 237 C.M.R. 18.01(7) requires a one-to-one ratio of non-apprentice installers to licensed electricians. We believe this requirement does not make for an efficient business environment, for the following reasons:

1. It slows down and complicates the installation process by placing greater constraints on hiring practices and operations;

2. There are simply not enough licensed electricians to complete all the work available in the Commonwealth;
3. Additionally, electricians who have gone through the process to become licensed tend to be more experienced professionals who generally prefer not to be on roofs or do the work that is required of more junior level crew members; and
4. This requirement also limits the opportunities for individuals from typically disenfranchised communities who have not had the opportunity to become licensed electricians.

SolarCity is committed to employing a diverse workforce, and this labor ratio requirement prevents us from hiring a broader range of employees and providing them with valuable skills and training. All of this means sales, installation, and design professionals are constrained heavily by the limited supply of licensed electricians in the Commonwealth.

As a solution, SolarCity recommends regulations that require one licensed electrician at each job site. While keeping the safety standards intact by having a licensed electrician on site at all times and encouraging growth in the trade, reducing the 1:1 ratio will enable more scalability.

This would not be a first-of-its-kind approach. In some states in which we operate, only one licensed electrician is required to be on site to supervise the installation. There is a 1:1 ratio for all Registered Apprentices recording hours but there is no cap on the amount of non-licensed installers. In other states, there must simply be one Master Electrician to review best practices and train the installation crews. We operate across these states and adhere to their ratio requirements while maintaining a great safety and quality record.

By lowering the ratio of licensed electricians to other rooftop crew members, solar companies can more easily and quickly hire installers, enable a greater deployment of electricians and increase jobs available to them, allowing this industry to realize full employment growth. This can be accomplished by setting minimum parameters around installation and offering educational resources to which we are committed to working with the Commonwealth.

Thank you for your time and consideration of this matter.

Shaun Chapman

Vice President, Policy and Electricity Markets
SolarCity