Improving the Efficiency of the Rooftop Solar Permitting Process





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About the SunShot Solar Outreach Partnership



















The SunShot Solar Outreach Partnership (SolarOPs) is a U.S. Department of Energy (DOE) program designed to increase the use and integration of solar energy in communities across the US.



IREC

- **50** I (c)(3) non-profit
- Goal = promote the sustainable development of renewable energy

Represented in regulatory proceedings by

Keyes, Fox & Wiedman, LLP





Speakers

- Sky Stanfield is Of Counsel with the law firm of Keyes, Fox & Wiedman, LLP in Oakland, California. Ms. Stanfield's practice focuses on the intersection between renewable energy regulation and environmental and land use law, with a particular focus on regulatory policy implementation, compliance and permitting processes. On behalf of IREC, Ms. Stanfield works to improve the efficiency and efficacy of the permitting process for distributed generation solar systems. She also is a leading voice for the improvement of interconnection standards and their interaction with the procurement and land use permitting processes in California.
- Erica Schroeder is an associate with Keyes, Fox & Wiedman LLP. Ms. Schroeder is deeply involved in IREC's efforts to investigate and improve permitting processes for renewable energy systems, a critical component to supporting renewable energy development nationwide. In addition, Ms. Schroeder represents IREC in state-level rulemakings on many topic areas essential to building sustainable markets for renewable energy including net metering rules, interconnection standards, and community renewables.



IREC's Solar Permitting Work

Rooftop Permitting



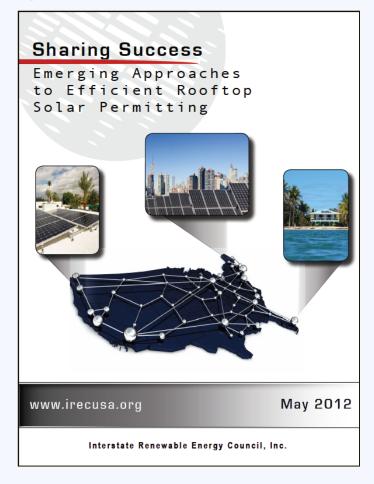
Ground-Mounted Permitting





Sharing Success: Emerging Approaches to Rooftop Permitting

- Examines rooftop solar permitting obstacles
- Highlights successful permitting improvements driven by local and state governments,
 and other entities
- Identifies practical approaches to manage solar permitting and achieve renewable goals





Webinar Agenda

I. Overview of the permitting process

- What are common problems?
- What are some successful solutions?

2. Implementing permitting improvements

- Action at the local and state levels
- Benefits of a regional approach

3. Q&A



Overview of the Permitting Process

Pre-Application – access to information on solar permit requirements and procedures



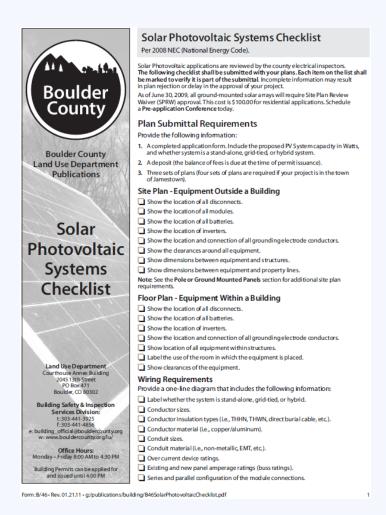
Application Submittal – application forms, fees and review

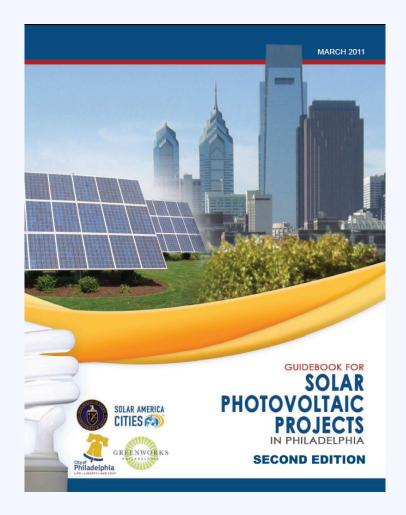


Inspections – scheduling inspections and inspector training



Pre-Application: Checklists and Other Guidance Documents

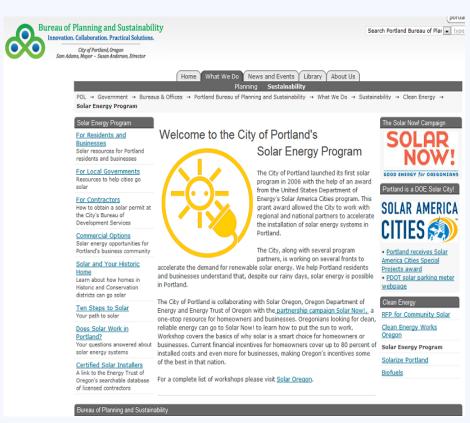






Pre-Application: Web Sites and Electronic Resources

- Permitting requirements applicable to solar
- The application form and any checklists
- Detail on how the application will be processed
- Links to other regulatory or private entities involved in solar permitting
- Links to additional information and resources



http://www.portlandonline.com/bps/index.cfm?c=43478



Solar Permit Application Form

	City of Phoenix		Solar Water Heating System
	DEVELOPMENT SERVICES DEPARTMENT		Residential Permit Application
			Date:
Project Name:			
•	55:		
•	ame:		Lot #:
			Project Valuation: \$
Description of		_	
	a solar water heating system.		Roof mounted collectors: ☐ Yes ☐ No
	size of collectors:		
			ollectors/tanks: psf
	alysis of existing roof system is		
			nodel name:
		0,512	
Owner Inform			
	ss Name:		
			State: Zip Code:
			Phone: Fax:
Contractor In		·	1 44.
	ne:		
			State: Zip Code:
			Phone: Fax:
	s (Phoenix PLT) #:		
			e Class and Number (ROC):
Applicant Sig			
		Other	
			Print Name:
			State: Zip Code:
			Phone: Fax:
Company Nan	ile.		none rax
		-Staff Us	e OnlyInitials:
Permit Type:	Permit #: T	Perm	nit Name:
			No COFO Yes No
			Cncl Dist: Zoning:
			Scope Code: SOLAR W/H Struc Class: 026
Review Fee C	ode: Fee:		Permit Fee Code: Fee:
			Total:
This publication	on can be made available in alte	ernate format	s (Braille, large print, computer diskette, or audiotape)
			ment at (602) 262-7811 voice or (602) 534-5500 TTY.
S1Splar Water He	eater Application.doc		TRT/DOC/00464

Bill Brooks, Solar ABCs, Expedited Permit Process for PV Systems (model form)

The inf	ormation in this guideline is intended to help local jurisdictions and contractors identify when PV system installations		
are sim residen	ple, needing only a basic review, and when an installation is more complex. It is likely that 50 % 75 % of all tital systems will comply with these simple criteria. For projects that fail to meet the simple criteria, resolution steps een suggested to provide as a path to permit approval.		
Requi	red Information for Permit:		
1.	Site plan showing location of major components on the property. This drawing need not be exactly to scale, but it should represent relative location of components at site (see supplied example site plan). PV arrays on dwellings with a 3' perimeter space at ridge and sides may not need separate fine service review.		
2.	Electrical diagram showing PV array configuration, wiring system, overcurrent protection, inverter, disconnects, required signs, and ac connection to building (see supplied standard electrical diagram).		
3.	Specification sheets and installation manuals (if available) for all manufactured components including, but not limited to, PV modules, inverter(s), combiner box, disconnects, and mounting system.		
Step 1	: Structural Review of PV Array Mounting System		
Is the a	urray to be mounted on a defined, permitted roof structure? Yes No		
If No d	ue to non-compliant roof or a ground mount, submit completed worksheet for the structure WKS1.		
Roof I	nformation:		
1.	Is the roofing type lightweight (Yes = composition, lightweight masonry, metal, etc) If No, submit completed worksheet for roof structure WKSI (No = heavy masonry, slate, etc).		
2.	Does the roof have a single roof covering? Yes No If No, submit completed worksheet for roof structure WKS1.		
3.	Provide method and type of weatherproofing roof penetrations (e.g. flashing, caulk)		
Moun	ting System Information:		
1.	Is the mounting structure an engineered product designed to mount PV modules? ☐ Yes ☐ No If No, provide details of structural attachment certified by a design professional.		
2.	For manufactured mounting systems, fill out information on the mounting system below:		
	a. Mounting System ManufacturerProduct Name and Model#		
	b. Total Weight of PV Modules and Railslbs		
	c. Total Number of Attachment Pointslbs (if greater than 45 lbs, see WKS1)		
	e. Maximum Spacing Between Attachment Points on a Railinches (see product manual for		
	maximum spacing allowed based on maximum design wind speed)		
	f. Total Surface Area of PV Modules (square feet)ft ²		
	g. Distributed Weight of PV Module on Roof (b ÷ f)lbs/ft²		
	If distributed weight of the PV system is greater than 5 lbs/ft², see WKS1.		
Step 9	P: Electrical Review of PV System (Calculations for Electrical Diagram)		
In orde	r for a PV system to be considered for an expedited permit process, the following must apply:		
1.	PV modules, utility-interactive inverters, and combiner boxes are identified for use in PV systems.		
	The PV array is composed of 4 series strings or less per inverter, and 15 kWSTC or less.		
2.	The total inverter capacity has a continuous ac power output 13,440 Watts or less		
3.	The ac interconnection point is on the load side of service disconnecting means (690.64(B)).		
3. 4.			
3. 4.	The electrical diagram (E1.1) can be used to accurately represent the PV system.		



Solar Permit Fees

- Sierra Club, Loma Prieta Chapter –
 encourages fees based upon staff time it takes
 to process solar permit application
- The Vote Solar Initiative, Project: Permit –
 community-led fee-reduction campaign
- State fee statutes Colorado, Arizona
- Fee waivers City and County of Honolulu



Application Submittal and Review

- In-person submittal with later review
 - Most common process
 - Improvement: Expedited review for pre-qualified projects, plans or installers
- Over-the-counter submittal and review for qualified systems
 - Often more efficient for city and applicant
 - Example: Scottsdale, AZ for all residential plan review, including solar



Application Submittal and Review

Online or electronic submittal and review

Potential to be significantly more

efficient for city and applicant

- Can improve communication
- However, can present high upfront costs





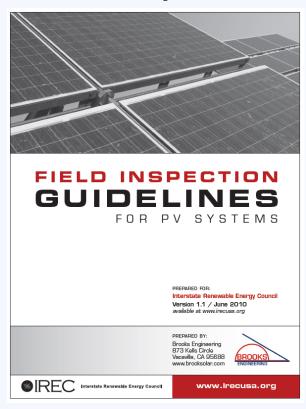
Inspection Scheduling

- Frequency and timing of inspections =
 critical cost component of solar installation
 - Rough or in-progress inspection
 - Electrical contractor or engineer on site
 - Reasonable time window
 - Ease of scheduling
- Coordination with interconnection inspection?



Inspector Training and Resources

To enable inspectors to know what to look for in a solar inspection, specifically





City of San Diego Residential Photovoltaic Systems

sidential Photovoltaic System Inspection Guidelines

The purpose of inspections by DSD staff is to ensure compliance with the California Electrical Code (CEC), other applicable codes and regulations, and the approved plans. The intent of the regulations is the practical safeguarding of persons and property from hazards arising from installation of solar systems. The following guidelines were developed to assist you with inspection process for the installation of the Photovoltaic (PV) system.

All equipment, array modules, inverters, racking, combiner boxes, DC disconnects, fittings, etc., shall be installed per approved plans and manufacturer installation instructions. All material and equipment shall be listed and labeled by an approved testing agency.

A. The Inspection Process:

It is the contractor or owner's responsibility to schedule and coordinate all required inspections and obtain approvals before covering or concealing any work. The contractor or responsible party shall be available at the jobsite and provide proper access for the inspector. Some inspections can be combined and/or eliminated if all of the new work and equipment is exposed and accessible. Some installations may require only a "final" inspection.

The following inspections are required:

For Ground Mounted Array Systems:

- Footings for array frame
- Underground Electrical (raceway and conduits)
- Final Inspection (complete system including modules, panel, wire terminations, grounding, etc.)

For Roof Mounted Array Systems:

- > Rough electrical (for concealed wiring if applicable)
- Roof array and bond (for integrated systems or tile roofs)
- Final Inspection



Photovoltaic Online Training Platform (PVOT)

- No-Cost online training for code officials
- Six basic learning modules covering the major topics of concern for field inspection and expedited permitting
- Seventh module is immersive activity imbedded in an open-source, game-based framework with its own assessment
- Will be available in mid-June 2012



Framework for the Efficient Processing of Solar Permits

- I. Consistent technical and procedural requirements across the region or U.S.
- 2. <u>Increased and readily available access to information</u> about permit requirements.
- 3. <u>Simplified standards and processes</u> focused only on solar installations.
- 4. Fee structures designed to fully compensate permitting authority while also keeping solar development costs at a minimum.



Implementing Improvements: Key Principles

Responsibility for change should be shared between permitting authorities and the solar industry.

 Changes to permitting policies should benefit municipal governments as well as solar installers and their customers.



Implementing Improvements: Local Government's Role

- Typically, local government controls the solar permitting process
- Importance of <u>balancing</u> government's needs and demands with encouraging solar energy and economic development





Implementing Improvements: Potential for State Involvement

- Regulatory structure provides for state control over permitting (Vermont)
- State chooses to make mandatory statewide permitting policy decisions
 - Building codes (Oregon)
 - -Other statutes (Colorado)
- State offers non-mandatory permitting guidance (California)



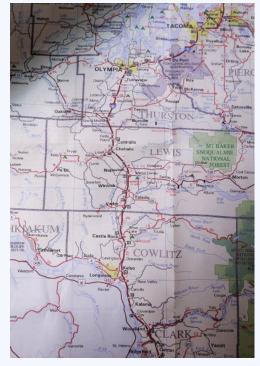
Implementing Improvements: Regional Approach

- Standardization across a geographically significant region
- Examples:
 - Long Island Unified Solar Permitting Initiative (LIUSPI)
 - East Bay Green Corridor: Permitting Initiative
 - County standardization efforts



Benefits of a Regional Approach to Permitting Reform

- Regional economic development
- Collaborative, cooperative and local
- Leverage existing regional relationships
- Administrative economies of scale
- Benefits to solar industry





Resources

- Sharing Success: Emerging Approaches to Efficient Rooftop Solar Permitting http://www.irecusa.org/2012/05/irec-releases-report-identifying-successful-strategies-for-permitting-solar-rooftop-systems
- IREC www.irecusa.org
- ICLEI www.iclei.org
- Resource Center http://www4.eere.energy.gov/solar/ sunshot/resource_center/





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U.S. Department of Energy

Questions?