



**Hawaii Solar Energy Association**  
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**TESTIMONY OF HAWAII SOLAR ENERGY ASSOCIATION  
IN REGARD TO SB 1094, RELATING TO RENEWABLE ENERGY  
BEFORE THE  
SENATE COMMITTEE ON TRANSPORTATION AND ENERGY  
ON  
FRIDAY, FEBRUARY 3<sup>RD</sup>, 2017**

Chair Inouye, Vice-Chair Dela Cruz, and members of the committee my name is Will Giese and I represent the Hawaii Solar Energy Association.

We **oppose** S.B. 1094. This bill seeks amend the standard by which certain solar hot water systems might qualify for the renewable energy investment tax credit un Hawaii Revised Statutes §235-12.5 and §269-44.

It is simply unclear to us what glaring need this legislation fulfills. Since 1994 the HECO, and now Hawaii Energy (HEEP), solar water heating programs have required SRCC Standard OG -100. The performance, prescriptive and quality standards that HECO/HEEP have built around SRCC Standard 100 go much further to ensure that solar water heating systems are properly sized, designed and installed than the less rigorous SRCC Standard OG-300.

In addition, the HECO/HEEP standards are much more appropriate for the Hawaiian Islands than Standard 300 which, for example, treats all of Hawaii as a single “sunshine zone”. Hawaii has no less than six very distinct sunshine zones. Standard OG-300, for example, would size solar systems for those living in the back of Manoa or Moanalua Valleys as it would folks in Waianae, the Ewa Plain or Kailua-Kona. Those of us that live and work here know there is a huge difference in the intensity and duration of sunlight in these several micro-climates.

Years of thought, development and engineering expertise has gone into the Hawaii appropriate HECO/HEEP standards and specifications. Systems designed to these standards ensure proper sizing, proper orientation, tilt and field installation. The HECO/HEEP specifications, moreover, require that the materials and components allowed for installation are appropriate for our harsh tropical climate. Currently HEEP maintains the specifications as a living document that is amended from time to time as necessary.

Perhaps most importantly, the HECO/HEEP standards and specifications has provision for a post installation 100 point inspection to determine if the contractor has sized,



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designed and installed the system in accordance with the written documents. These standards have been in place for over twenty-five years and the overall quality of installations is such that only random inspections are now required to ensure conformance.

No set of standard by itself insures quality. Energy Star, for example, simply references other existing standards and charges manufacturers fees to re-register another third-party standard with the DOE. It also has no provision, nor does SRCC Standard OG-300, for rigorous post installation quality inspections.

It is our sense that continuing to adhere to the HECO/HEEP standards and specifications provides the best assurance that both the consumer and the Hawaii State government are getting their monies worth. The system of quality assurance, at least as it applies to solar water heating installations in Hawaii, is far from broken.

We urge the committee to defer SB 1094.

Thank you for the opportunity to provide these comments.

**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Thursday, February 2, 2017 5:34 PM  
**To:** TRE Testimony  
**Cc:** mendezj@hawaii.edu  
**Subject:** \*Submitted testimony for SB1094 on Feb 3, 2017 13:20PM\*

**SB1094**

Submitted on: 2/2/2017

Testimony for TRE/CPH on Feb 3, 2017 13:20PM in Conference Room 225

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Javier Mendez-Alvarez	Individual	Support	No

Comments:

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