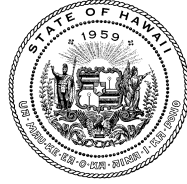


DAVID Y. IGE  
GOVERNOR

SHAN TSUTSUI  
LT. GOVERNOR



MARIA E. ZIELINSKI  
DIRECTOR OF TAXATION

DAMIEN A. ELEFANTE  
DEPUTY DIRECTOR

STATE OF HAWAII  
**DEPARTMENT OF TAXATION**  
P.O. BOX 259  
HONOLULU, HAWAII 96809  
PHONE NO: (808) 587-1540  
FAX NO: (808) 587-1560

To: The Honorable Lorraine R. Inouye, Chair  
and Members of the Senate Committee on Transportation and Energy

The Honorable Rosalyn H. Baker, Chair  
and Members of the Senate Committee on Commerce, Consumer Protection, and Health

Date: Friday, February 3, 2017  
Time: 1:20 P.M.  
Place: Conference Room 225, State Capitol

From: Maria E. Zielinski, Director  
Department of Taxation

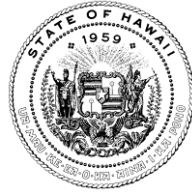
Re: S.B. 1094, Relating to the Renewable Energy

The Department of Taxation (Department) appreciates the intent of S.B. 1094 and provides the following comments for your consideration.

S.B. 1094 amends section 235-12.5, Hawaii Revised Statutes (HRS), to require that solar water heater systems eligible for the Renewable Energy Technologies Income Tax Credit (RETITC) meet standards established by the Public Utilities Commission, and amends section 269-44, HRS, to clarify what requirements the Public Utilities Commission may establish regarding solar water heaters. The measure is effective on approval and applies to taxable years beginning after December 31, 2017.

The Department can administer the proposed changes to the RETITC by the effective date.

Thank you for the opportunity to provide comments.



DAVID Y. IGE  
GOVERNOR  
SHAN S. TSUTSUI  
LT. GOVERNOR

STATE OF HAWAII  
OFFICE OF THE DIRECTOR  
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS  
335 MERCHANT STREET, ROOM 310  
P.O. Box 541  
HONOLULU, HAWAII 96809  
Phone Number: 586-2850  
Fax Number: 586-2856  
www.hawaii.gov/dcca

CATHERINE P. AWAKUNI COLÓN  
DIRECTOR  
JO ANN M. UCHIDA TAKEUCHI  
DEPUTY DIRECTOR

TO THE SENATE COMMITTEE ON TRANSPORTATION AND ENERGY  
AND  
TO THE SENATE COMMITTEE ON COMMERCE, CONSUMER PROTECTION,  
AND HEALTH

THE TWENTY-NINTH LEGISLATURE  
REGULAR SESSION OF 2017

FRIDAY, FEBRUARY 3, 2017  
1:20 PM

TESTIMONY OF DEAN NISHINA, EXECUTIVE DIRECTOR, DIVISION OF  
CONSUMER ADVOCACY, DEPARTMENT OF COMMERCE AND CONSUMER  
AFFAIRS, TO THE HONORABLE LORRAINE R. INOUE, CHAIR,  
THE HONORABLE ROSALYN H. BAKER, CHAIR,  
AND MEMBERS OF THE COMMITTEES

SENATE BILL NO. 1094 - RELATING TO THE RENEWABLE ENERGY

DESCRIPTION:

This measure proposes to require that in order to qualify for the renewable energy technologies income tax credit, solar water heater systems meet the standards for solar water heater systems established by the Public Utilities Commission ("PUC" or "Commission") and requires the Commission to establish standards for hot water heater systems that are ENERGY STAR qualified and listed or systems certified to the Solar Rating and Certification Corporation (SRCC) standard 3000. The requirements would apply to taxable years beginning after December 31, 2017.

POSITION:

The Division of Consumer Advocacy ("Consumer Advocate") offers comments to this bill.

COMMENTS:

This bill's proposed addition to Hawaii Revised Statutes ("HRS") § 235-12.5(b)(1) would tie eligibility for the solar thermal tax credit to meeting the solar water heater standards set out by the Commission in Docket No. 2008-0249, in the Decision & Order filed on July 11, 2009, and then clarified in the Decision & Order filed on October 29, 2009, all pursuant to the mandate in HRS § 269-44. This bill would also specify in HRS § 269-44 that the Commission's standards must include ENERGY STAR qualification and Solar Rating and Certification Corporation standard 3000 certification, thus implying predetermined updates in Docket No. 2008-0249.

The Commission's process for deciding and updating solar water heater standards in Docket No. 2008-0249 was highly technical and detailed in nature and involved many different stakeholders. Specifying particular standards in statute may not be the best approach since, if the standards continue to be updated, if the statutory language is not continuously updated as well, there may be a conflict between industry and statutory standards. The Consumer Advocate suggests that the provision in this bill to add specific solar water heater standards to HRS § 269-44 be removed. If, however, the legislature believes incorporating technical standard references in statute is desirable, a housekeeping change may be necessary as it appears that the SRCC's most recent standards are the ICC 900/SRCC 300-2015.

In the alternative, the Consumer Advocate humbly suggests that the Legislature pass a resolution encouraging the Commission to revisit Docket No. 2008-0249 in order to update the standards for solar water heaters after a Commission approved procedural process.

Thank you for this opportunity to testify.

TESTIMONY OF RANDY IWASE  
CHAIR, PUBLIC UTILITIES COMMISSION  
STATE OF HAWAII  
TO THE  
SENATE COMMITTEES ON  
TRANSPORTATION AND ENERGY  
&  
COMMERCE, CONSUMER PROTECTION, AND HEALTH

February 3, 2017  
1:20 p.m.

**MEASURE:** S.B. No. 1094  
**TITLE:** RELATING TO THE RENEWABLE ENERGY

Chair Inouye, Chair Baker, and Members of the Committees:

**DESCRIPTION:**

This measure would require that solar water heating systems (“SWHS”) meet the SWHS standards established by the Public Utilities Commission (“Commission”) in order to qualify for a renewable energy technology system tax credit pursuant to Section 235-12.5. This measure also specifies that the Commission’s standards for SWHS include “systems that are ENERGY STAR qualified and listed or systems certified to the Solar Rating and Certification Corporation (SRCC) standard 3000”.

**POSITION:**

The Public Utilities Commission (“Commission”) offers the following comments for the Committees’ consideration.

**COMMENTS:**

The Commission notes that the current SWHS standards were established in Docket No. 2008-0249 after a highly complex and detailed review that involved collaboration between many stakeholders. Establishing a specific standard for SWHS in statute may not allow for this same level of review and collaboration, and would likely need to be amended frequently to keep current with improving technology.

Thank you for the opportunity to testify on this measure.



February 1, 2017

**Senator Lorraine Inouye Chair,  
Senator Donovan Dela Cruz Vice Chair,  
and Committee Members of the Senate Committee on Transportation and Energy**

**RE: ICC Supports Passage of SB 1094**

Dear Chair, Vice Chair and Committee Members:

The International Code Council (ICC) is a 58,000 member, non-profit public benefit corporation dedicated to helping the building safety community and construction industry provide safe, sustainable, energy-efficient and affordable construction through the development of codes and standards used in the design, building and compliance process by state and local governments including the State of Hawaii and its Counties.

ICC applauds the courage, commitment and leadership demonstrated by the Hawaii State Legislature by setting clean energy initiatives and renewable energy portfolio standards with the goal for the State to be one hundred percent renewable by 2045.

The passage of SB 1094 will help continue to incentivize private investment in renewable energy systems.

Consistency between State requirements and federal requirements regarding income tax credits will benefit Hawaii's citizens and building owners. Setting the same standards **will reduce paperwork** and make the application for tax credits easier because **one set of documentation will meet the requirements for both the State and the federal government.**

The proposed legislation will align the State's standards for qualifying for the State renewable energy technologies income tax credit with the federal standards required in order to qualify for the federal renewable energy technologies income tax credit.

The bill requires one correction to section 3, page 4, on line 10. The correction should state three-hundred i.e. **"(SRCC) standard 300"**

ICC strongly supports and urges passage of SB 1094 because it will aid to help achieve the State's energy policy goals.

Thank you for your consideration of my comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Kraig Stevenson", with a long horizontal line extending to the right.

Kraig Stevenson, CBO  
ICC Government Relations  
[kstevenson@iccsafe.org](mailto:kstevenson@iccsafe.org)  
562-201-9209

# TAX FOUNDATION OF HAWAII

126 Queen Street, Suite 304

Honolulu, Hawaii 96813 Tel. 536-4587

**SUBJECT:** INCOME, Mandate Solar Water Heater Standards

**BILL NUMBER:** SB 1094

**INTRODUCED BY:** INOUYE, DELA CRUZ, GALUTERIA, HARIMOTO, KIDANI, Baker, S. Chang

**EXECUTIVE SUMMARY:** Apparently seeks to mandate that solar water heaters conform to Energy Star standards to be eligible for the renewable energy technologies credit. Technical changes are necessary to accomplish these goals, and the underlying policy should be considered carefully if there is a possibility that it would impede the policy goal of the original statute (to get consumers to buy and use renewable energy devices).

**BRIEF SUMMARY:** Amends HRS section 235-12.5, ostensibly to require that a solar system to heat water for household use meets standards established under HRS section 269-44.

Amends HRS section 269-44, ostensibly to require that solar water heater system standards state that the systems be Energy Star qualified or systems certified compliant with Solar Rating and Certification Corporation (SRCC) standard 3000.

**EFFECTIVE DATE:** Upon approval, applies to taxable years beginning after December 31, 2017.

**STAFF COMMENTS:** This measure is technically flawed because the amendments proposed do not accomplish the statute's apparent purpose.

First, the measure amends HRS section 235-12.5(b)(1), relating to the cap amounts, to add a qualification that the solar water heater system meet PUC standards. So, if the solar water heater system does not meet PUC standards it qualifies as an "other solar energy system" in 235-12.5(b)(2) with a higher credit cap. That result is counter to the apparent purpose of the bill. Instead, the requirement could be written in to the definition of "solar or wind energy system" in HRS section 235-12.5(c),

Second, the bill amends HRS section 269-44, a section that required the PUC to come up with solar water system standards by July 1, 2009, so such standards presumably exist now. The amendment provides that the standards include, but not be limited to, Energy Star systems and SRCC standard 3000 compliant systems. But the PUC is not mandated to revise or update its 2009 standards. So the statutory amendment could accomplish nothing. If the idea is to force solar systems to be Energy Star or SRCC compliant, lawmakers should consider a second paragraph in section 269-44 mandating revision of the standards to require such compliance by a date certain.

As a policy matter, lawmakers should carefully consider whether tightening of renewable energy standards is desirable if the goal is to get taxpayers to install the devices. In 2015, lawmakers

authorized \$10 million to cool the sweltering classrooms in our public schools, but added so many requirements that the request for proposals to the industry for school cooling looked more like a novel than a pamphlet. Schools couldn't use the money to go down to the local hardware; the work called for was a lot more complicated. As a result, the \$10 million initiative to cool the schools turned out to be a miserable failure. Nowhere near the 1000 classrooms promised were cooled by the end of 2015. The lesson to be learned is that lawmakers need to be wary of slapping on too many requirements that would drive up prices and dissuade consumers from using their hard-earned dollars on a solar heating system.

Digested 1/31/2017



# INTER-ISLAND SOLAR SUPPLY

761 Ahua St.	Honolulu, HI	96819	Oahu	Tel: (808) 523-0711	Fax: (808) 536-5586
73-5569 Kauhola St.	Kailua-Kona, HI	96740	West Hawai'i Island	Tel: (808) 329-7890	Fax: (808) 329-5753
16-206 Wiliama St.	Keaau, HI	96749	East Hawai'i Island	Tel: (808) 935-0948	Fax: (808) 498-4606
215 S. Wakea Ave. Un. C	Kahului, HI	96732	Maui	Tel: (808) 871-1030	Fax: (808) 873-7825
1764 Haleukana St.	Lihue, HI	96766	Kauai	Tel: (808) 378-4080	Fax: (808) 378-4078

**TESTIMONY OF INTER-ISLAND SOLAR SUPPLY  
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 Rick Reed and I am the president of Inter-Island Solar Supply. Our company has been engaged in the distribution of solar water heating, PV, wind energy and other renewable energy equipment and component parts since 1975. We also have been involved in various discussions since that time regarding the most appropriate standards, specifications and quality control provisions for all types of renewable energy devices.

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, 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 1:34 PM  
**To:** TRE Testimony  
**Cc:** opa@heliodyne.com  
**Subject:** Submitted testimony for SB1094 on Feb 3, 2017 13:20PM

**SB1094**

Submitted on: 2/2/2017

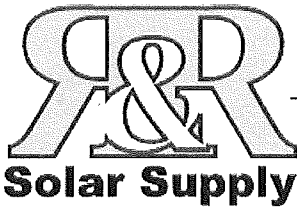
Testimony for TRE/CPH on Feb 3, 2017 13:20PM in Conference Room 225

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Ole Pilgaard	Heliodyne	Support	No

Comments: We support that state of Hawaii legislature adopt the national Solar Rating and Certification Corporation standard OG300 to qualify for state rebates, utility rebates and state tax credits. We do not see any need to have a unique and special rating and certification system in Hawaii

Please note that testimony submitted less than 24 hours prior to the hearing, improperly identified, or directed to the incorrect office, may not be posted online or distributed to the committee prior to the convening of the public hearing.

Do not reply to this email. This inbox is not monitored. For assistance please email [webmaster@capitol.hawaii.gov](mailto:webmaster@capitol.hawaii.gov)



Testimony before the Senate committee on Transportation and Energy  
Friday, February 3, 2017 1:20 pm, room 225

S.B. NO.1094 Relating to the Renewable Energy

Aloha Chairs Inouye and Baker, Vice Chairs Nishihara and Dela Cruz and committee members.

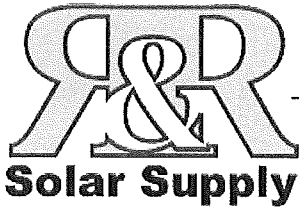
My name is Rolf Christ and I'm testifying on behalf of R & R Solar Supply in opposition to changing requirements for solar water heaters. R & R is the only hot water collector manufacturer in Hawaii. We have been a SRCC participant for about 20 years. I was the longest serving director on the national SRCC board when it merged with the International Code Council (ICC) a couple of years ago and still maintain a position on the ICC code council today. I was on the standards committee that developed OG-100 and OG-300 standards (Committee Credentials attached).

Having said all that, I would like to point out that for the last 20 years the Hawaii rebate program, now administered by the PUC and the new construction mandate in the PUC Decision and Order from 2008, both utilize SRCC OG-100 standards for various collector output ratings. Both, rebate program administrators and the Hawaii's Solar Hot Water industry have concluded during the first decade of the rebate program, that collector ratings are more appropriate to use in Hawaii, rather than system ratings, due to our many micro climates. This has been verified by an Impact Evaluation for the Solar Hot Water system performance under the then HECO rebate program in 1999.

Collector output tables are continuously updated by the PUC contractor, using the on-line SRCC/ICC OG-100 rating tables for all collectors used in the program.

OG-100 ratings cover all the types of solar systems qualifying for our tax credits: residential, commercial and pool heating and is consistent with the OG-100 requirement in the federal tax credit.

OG-300 ratings are currently not available for Pool Heating and most commercial or multi-family systems. OG-300 ratings use OG-100 performance testing and model the results into ratings for certain sizes of residential systems only. Each collector brand used in Hawaii for each system size in every single Hawaii climate zone from Ewa Beach to Maunawili would have to get it's own OG-300 system rating. We are talking about hundreds of certifications that would add cost to each installation, that would be passed on the the homeowner and eventually also INCREASE THE STATE'S COST IN FORM OF LARGER TAX CREDITS.



808.842.0011 808.847.4938 F

922 Austin Lane Building D Honolulu HI 96817

Current Hawaii standards used in the very successful PUC rebate program as well as in the Solar Mandate are more Hawaii specific and more stringent than OG-300 (ie by requiring upgraded materials for our island marine environment).

Complying with the current standards, OG-100 certifications and PUC/Hawaii Energy Rebate program system requirements comes with no additional cost to the customer and has been practiced by our industry for more than 2 decades now.

Let's not try to fix what is not broken.

I'm all for SRCC/ICC certifications, but let's keep using SRCC OG-100 for all solar hot water collectors.

Rolf Christ

A handwritten signature in black ink, appearing to read 'Rolf Christ', written over a light blue horizontal line.

President and CEO

**International Code Council Solar Thermal Standard Consensus Committee (IS-STSC)**

Consensus Committee SCOPE: The Solar Thermal Standard Consensus Committee (IS-STSC) shall have primary responsibility for minimum requirements to safeguard the public health, safety and general welfare along with minimum performance, and evaluation requirements for solar thermal systems. The requirements contained in the *International Codes* pertaining to these situations shall be coordinated with the standards developed by the IS-STSC Consensus Committee.

This standard was processed and approved for submittal to ANSI by the ICC Solar Thermal Standard Consensus Committee (IS-STSC). Committee approval of the standard does not necessarily imply that all committee members voted for its approval.

Representatives on the Consensus Committee are classified in one of three voting interest categories, General Interest (G), User Interest (U) and Producer Interest (P). The committee has been formed in order to achieve consensus as required by ANSI Essential Requirements. At the time it approved this standard, the IS-STSC Consensus Committee consisted of the following members:

**Rolf Christ** (P), R&R Solar Supply, Honolulu, Hawaii

**Thomas Cleveland** (U), North Carolina Clean Energy Technology Center at NC State University, Raleigh, North Carolina

**John Del Mar, PE, MS** (U), Florida Solar Energy Center (FSEC), Cocoa, Florida

**William Funk, Jr.** (G), Cecil County Permits and Inspections, Elkton, Maryland

**Rex Gillespie** (P), Caleffi North America, Inc., Milwaukee, Wisconsin

**McKenzie W. James** (G), City of Portland, Portland, Oregon

**Robert J. Klein, CBO** (G), Town of Hilton Head Island, Hilton Head Island, South Carolina

**Nathan Lohse** (P), FAFCO, Inc., Chico, California

**Bill Miao** (P), SunEnergyNet, San Diego, California

**Larry Sherwood** (U), Sherwood Associates, Boulder, Colorado

**John Smirnow** (P), Solar Energy Industries Association (SEIA), Washington, District of Columbia

**Shawn Strausbaugh** (G), Arlington County, Arlington, Virginia

Secretaries: **Shawn Martin**, Director of PMG Activities, Plumbing, Mechanical and Fuel Gas Group, International Code Council, Pittsburgh, Pennsylvania; **Jim Huggins**, Technical Director, Solar Rating and Certification Corporation, Cocoa, Florida.

**Voting Membership in Each Category**

Category	Number
General (G)	4
User (U)	3
Producer (P)	5
<b>TOTAL</b>	<b>12</b>

**Interest Categories**

**General Interest:** Individuals assigned to the General Interest category are those who represent the interests of an entity, including an association of such entities, representing the general public, or entities that promulgate or enforce the provisions within the committee scope. These entities include consumers and government regulatory agencies.

**User Interest:** Individuals assigned to the User Interest category are those who represent the interests of an entity, including an association of such entities, which is subject to the provisions or voluntarily utilizes provisions within the committee scope. These entities include academia, applied research laboratory, building owner, design professional, government nonregulatory agency, insurance company, private inspection agency and product certification/evaluation agency.

**Producer Interest:** Individuals assigned to the Producer Interest category are those who represent the interests of an entity, including an association of such entities, which produces, installs or maintains a product, assembly or system subject to the provisions within the committee scope. These entities include builder, contractor, distributor, laborer, manufacturer, material association, standards promulgator, testing laboratory and utility.

**NOTE—Multiple Interests:** Individuals representing entities in more than one of the above interest categories, one of which is a Producer Interest, are assigned to the Producer Interest. Individuals representing entities in the General Interest and User Interest categories are assigned to the User Interest.

## FOREWORD

ICC, SRCC, its members and those participating in the development of ICC 901/SRCC 100—2015 do not accept any liability resulting from compliance or noncompliance with the provisions of ICC 901/SRCC 100—2015. Neither ICC nor SRCC have the power or authority to police or enforce compliance with the contents of this standard. Only the governmental body that enacts this standard into law has such authority.

### International Code Council Solar Thermal Standard Consensus Committee (IS-STSC)

Consensus Committee SCOPE: The Solar Thermal Standard Consensus Committee (IS-STSC) shall have primary responsibility for minimum requirements to safeguard the public health, safety and general welfare along with minimum performance, and evaluation requirements for solar thermal systems. The requirements contained in the *International Codes* pertaining to these situations shall be coordinated with the standards developed by the IS-STSC Consensus Committee.

This standard was processed and approved for submittal to ANSI by the ICC Solar Thermal Standard Consensus Committee (IS-STSC). Committee approval of the standard does not necessarily imply that all committee members voted for its approval.

Representatives on the Consensus Committee are classified in one of three voting interest categories, General Interest (G), User Interest (U) and Producer Interest (P). The committee has been formed in order to achieve consensus as required by ANSI Essential Requirements. At the time it approved this standard, the IS-STSC Consensus Committee consisted of the following members:

**Rolf Christ** (P), R&R Solar Supply, Honolulu, Hawaii

**Thomas Cleveland** (U), North Carolina Clean Energy Technology Center at NC State University, Raleigh, North Carolina

**John Del Mar, PE, MS** (U), Florida Solar Energy Center (FSEC), Cocoa, Florida

**William Funk, Jr.** (G), Cecil County Permits and Inspections, Elkton, Maryland

**Rex Gillespie** (P), Caleffi North America, Inc., Milwaukee, Wisconsin

**McKenzie W. James** (G), City of Portland, Portland, Oregon

**Robert J. Klein, CBO** (G), Town of Hilton Head Island, Hilton Head Island, South Carolina

**Nathan Lohse** (P), FAFCO, Inc., Chico, California

**Bill Miao** (P), SunEnergyNet, San Diego, California

**Larry Sherwood** (U), Sherwood Associates, Boulder, Colorado

**John Smirnow** (P), Solar Energy Industries Association (SEIA), Washington, District of Columbia

**Shawn Strausbaugh** (G), Arlington County, Arlington, Virginia

Secretaries: **Shawn Martin**, Director of PMG Activities, Plumbing, Mechanical and Fuel Gas Group, International Code Council, Pittsburgh, Pennsylvania; **Jim Huggins**, Technical Director, Solar Rating and Certification Corporation, Cocoa, Florida.

### Voting Membership in Each Category

Category	Number
General (G)	4
User (U)	3
Producer (P)	5
<b>TOTAL</b>	<b>12</b>

### Interest Categories

**General Interest:** Individuals assigned to the General Interest category are those who represent the interests of an entity, including an association of such entities, representing the general public, or entities that promulgate or enforce the provisions within the committee scope. These entities include consumers and government regulatory agencies.

**User Interest:** Individuals assigned to the User Interest category are those who represent the interests of an entity, including an association of such entities, which is subject to the provisions or voluntarily utilizes provisions within the committee scope.

These entities include academia, applied research laboratory, building owner, design professional, government nonregulatory agency, insurance company, private inspection agency and product certification/evaluation agency.

**Producer Interest:** Individuals assigned to the Producer Interest category are those who represent the interests of an entity, including an association of such entities, which produces, installs or maintains a product, assembly or system subject to the pro-



Apricus Inc.  
6060 W Manchester Ave., Ste. 109  
Los Angeles, CA 90045  
1-909-374-9800

To whom it may concern,

On behalf of Apricus Inc, a manufacturer of solar thermal collectors, used across the United States and around the world, the following comments in favor of SB1094, which would require solar thermal systems installed on single-family homes to require OG-300 certification.

-The SRCC OG-300 program is an important safety and quality check for solar thermal systems that ensures the system installed for the homeowner will both 1) meet general plumbing and construction safety codes when installed, and 2) perform as advertised to the homeowner.

-SRCC , a division of ICC, is a very helpful organization that makes it possible for OG-300 certificates easy to acquire and update to meet the market demands, including having new products tested and certified.

-Most products on the market today that are used in solar thermal are already certified, and many meet the requirements and could easily pass the vetting process (fire/electrical/plumbing code compliance)

-the OG-300 program is implemented and required by many AHJs and utilities/rebate providers across the continental US. The program mandates quality of both products and workmanship which are necessary for solar technology to be implemented effectively to reduce both fuel costs and greenhouse gas emissions for the people.

Sincerely,

Jack Tyson  
Technical Engineer  
Apricus Inc  
203-988-9114 [jack.tyson@apricus.com](mailto:jack.tyson@apricus.com)