



## Department of Labor and Training

Workforce Regulation and Safety Division  
Joseph Degnan, Assistant Director

### **Statement Regarding Workforce Regulation and Safety Policy 15-01**

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As the licensing authority for the electrical trade, DLT's Workforce Regulation and Safety Division received a number of inquiries in early 2015 from contractors, renewable energy professionals and electricians seeking guidance regarding licensure requirements pertaining to the scope of work performed on renewable energy projects.

On March 16, 2015, DLT convened a stakeholder group to seek input from professionals representing installers, contractors, electricians and renewable energy policy groups. Several parties attended this meeting and offered their position as to how DLT should enforce RIGL §5-6-8 (g), *Renewable Energy Professional* limited electrical license. Parties were asked to provide written testimony in support of their position to Assistant Director Joseph Degnan subsequent to the meeting.

Based on the department's review of the comments received, guidance previously issued by the independent State Board of Examiners of Electricians and requirements of related licensing laws in neighboring states, the department has issued Workforce Regulation and Safety (WRS) policy 15-01.

This policy requires any and all components of solar installation projects considered to be electrical apparatus to be installed by electricians licensed by the department. Taking all aspects of photovoltaic (PV) systems into consideration, the department's position is that the racking/rail systems for PV installations are indeed part of the effective grounding and bonding systems for these installations. As such, only persons that have received the requisite classroom and on-the-job training necessary to obtain journeyman licensure by DLT are permitted to install these systems. Electrical apprentices, working under the guidance and direct supervision of licensed journeymen may also perform these installations.

4/28/2015



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### **WRS POLICY ADVISORY: 15-01**

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**SUBJECT: Installation of Renewable Energy Technologies**

**PURPOSE: To clarify licensure requirements for the installation of renewable energy technologies.**

**DATE ISSUED: April 28, 2015**

Rhode Island General Laws § 5-6-8 establishes a Renewable Energy Professional Certificate which allows certificate holders without an electrical license to perform ancillary non-electrical renewable energy work. Licensed electricians are required to perform all renewable energy electrical work.

It is the policy of the Department of Labor and Training that:

The term apparatus under RIGL § 5-6-8 (g) includes, but is not limited to: frames, racks, rails, modules and photovoltaic panels.

Ancillary non-electrical renewable energy work under R.I. Gen. Laws §5-6-8 (g) includes advertising, bidding, contracting, and distributing materials to the final location of installation. Additionally, this work includes the installation of ground and rooftop support brackets and ballasts for rack systems.

Solar sheathing systems under RIGL§ 5-6-8 (g) are limited to photovoltaic modules that are attached directly to the roof structure without a racking or rail system and replace material as the primary weatherproofing system for the roof structure.

Conflicting interpretations of the law led the Department to provide this guidance. Trade license laws will be enforced by the Department in accordance with this policy. This policy applies to all projects bid for and awarded on or after the policy effective date.