



Attn: Oregon Solar Energy Code Committee  
c/o: Dana Fischer and Aeron Teverbaugh

*RE: Requests for added definition, clarification of intention, and further revision of elements of the Code as drafted 4/5/2010.*

-----

## **Chapter 2: Definitions**

- *Consider inclusion of the definition of “sloped roof.” Term referenced in the following code sections: 304.9.1, 304.9.1.A, 304.9.2.*
- *Similarly, consider inclusion of the definition of “flat roof.” Term referenced in the following code section: 304.9.2.*

**303.4 Certification Requirements.** PV racking, support structures and attachments shall comply with one of the following:

1. Certified to UL 1703 by a Nationally Recognized Testing Laboratory and installed in accordance with the manufacturers installation instructions.
2. Designed by an Oregon Licensed Engineer or Architect.
3. Field evaluation by an Approved Field Evaluation Firm.
4. Approval by the Authority Having Jurisdiction.

- *Clarify whether the PV system or racking materials need to be designed by an OR Engineer.*
- *Are we heading to a point where we will need to use listed racking systems?*



**304.8 Roof Drainage.** PV systems shall not be installed in a manner that would obstruct roof drainage. No vertical supports or roof penetrations shall be allowed within 12 inches (305 mm) of each side of the low point of the valley. The PV modules or racking may extend into the valley no more than 6 inches from the valley low point provided that a minimum 2 inch clearance above the surface of the roof is maintained.

- *Consider adding an exception or other wording for flat roofs.*

### **304.9.1 General Pathway Requirements.**

- *Looks great! Thank you for the energy your sub-committee put toward this crucial element of the code.*

-----  
*Your consideration of this letter is very much appreciated Please do not hesitate to contact me with questions or concerns.*

*Derek Cropp  
Project Manager, Signing Supervisor Electrician  
SolarCity  
503.956.5695  
DCropp@SolarCity.com*