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## Definition of Qualified Installer - Admin Code 83 Part 461 & Part 468

1 message

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Hello

In reading through the recently released InClimate ABP guidebook, more particularly the proposed definition for qualified installer only matches Section 16-128A Public Utilities Act Title 83 Part 461 and leaves out the definition provided in Part 468. The final LTRPPP section 2.3.2.4 references Section 16-128A of the Public Utilities Act to define the qualifications. The reference to Section 16-128A is provided below in quotes.

“Certain facilities seeking to participate in the RPS are also subject to an installer qualification requirement. Specifically, after June 1, 2017, “new photovoltaic projects or new distributed renewable energy generation devices [ . . . ] must be procured from devices installed by a qualified person in compliance with the requirements of Section 16-128A of the Public Utilities Act and any rules or regulations adopted thereunder.”

The final LTRPPP further references the parties seeking to develop DG projects to be aware of Part 461 and Part 468, referenced in following quotes. Part 461 specifically outlines utility scale solar projects, which are defined as having a nameplate capacity greater than 2000 kilowatts. Part 468 specifically outlines distributed generation projects which are defined as having a nameplate capacity less than 2000 kilowatts.

“Any parties seeking to develop new photovoltaic projects or DG projects in Illinois should also be aware of the Commission’s Part 461 and Part 468 rules (governing distributed generation installers) and certification process more generally as well. The definition of “Qualified person” may preclude the inclusion of self-installed new photovoltaic projects in the Adjustable Block Program (unless the self-installer meets the “qualified person” definition).”

The definition of a qualified person per part 461 is provided below in quotes.

““Qualified person” means a person who performs installations on behalf of the certificate holder and who has completed at least one of the following programs requiring lab or field work and received a certification of satisfactory completion: an apprenticeship as a journeyman electrician from a USDOL-registered or an applicable state-agency-registered electrical apprenticeship and training program; a North American Board of Certified Energy Practitioners (NABCEP) distributed generation technology certification program; an electrical training program for in-house employees established and administered by an electric utility regulated by the Commission; or an Associate in Applied Science degree from an Illinois Community College Board-approved community college program in solar generation technology.”

The definition of a qualified person per part 468 is provided below in quotes.

““Qualified person” means a person who performs installations on behalf of the certificate holder and who has either satisfactorily completed at least five installations of a specific distributed generation technology or has completed at least one of the following programs requiring lab or field work and received a certification of satisfactory completion: an apprenticeship as a journeyman electrician from a DOL registered electrical apprenticeship and training program; a North

American Board of Certified Energy Practitioners (NABCEP) distributed generation technology certification program; an Underwriters Laboratories (UL) distributed generation technology certification program; an Electronics Technicians Association (ETA) distributed generation technology certification program; or an Associate in Applied Science degree from an Illinois Community College Board approved community college program in the appropriate distributed generation technology. To be considered a "qualified person", the experience and/or training relied upon must be with the same type of distributed generation technology for which the qualification status is sought."

Although the definitions are very similar, Part 468 provides additional certification program options including an Electronics Technicians Association (ETA) distributed generation technology certification program.

In addition to the above, the EPA Adjustable Block Program website faq page, address provided, references 83 admin code 468.20 for the definition of a qualified person. The section provided below in quotes.

<https://illinoisabp.com/faq/>

"A system applying for the Adjustable Block Program can only be self-installed if the individual installing the system is a Qualified Person which is defined under 83 Ill. Adm. Code § 468.20 as:

"Qualified person" means a person who performs installations on behalf of the certificate holder and who has either satisfactorily completed at least five installations of a specific distributed generation technology or has completed at least one of the following programs requiring lab or field work and received a certification of satisfactory completion: an apprenticeship as a journeyman electrician from a DOL registered electrical apprenticeship and training program; a North American Board of Certified Energy Practitioners (NABCEP) distributed generation technology certification program; an Underwriters Laboratories (UL) distributed generation technology certification program; an Electronics Technicians Association (ETA) distributed generation technology certification program; or an Associate in Applied Science degree from an Illinois Community College Board approved community college program in solar generation technology."

We went through great pains to obtain an ETA certification after referencing the LTRPPP and subsequent Part 468 certification requirements. We have been successfully installing systems for Illinois customers with obtaining SRECs in mind, it would be detrimental to our business and damaging to our customers if the final definition of a qualified installer only included Part 461 and not Part 468 as referenced in the LTRPPP.

Please ensure the final version of the guidelines include both definitions so our customers can apply for SRECs in January 2019 and we can continue providing Illinois residents high quality solar systems.

Thanks

**Dustin Landwehr**

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