

Board of Electricity
c/o Department of Labor and Industry
443 Lafayette Road North Saint Paul,
MN 55155-4344

dli.cclboards@state.mn.us

FINAL INTERPRETATION

Subject: Installation of Building Integrated Photovoltaic Systems

References: Article 100 definition of "Equipment" and Section 690.4(B) - 2023 NEC

Submitted by: Mr. Shane Mekeland, State Representative

Approved by: Minnesota Board of Electricity, by Chair Duane Hendricks

Date Received: October 19, 2023


Issue Date: October 26, 2023

Question: In July of 2009, the Minnesota Board of Electricity issued a Final Interpretation regarding photovoltaic panels and associated parts and components. That initial request determined that all solar panels and associated components were considered “electrical equipment” and subject to licensing and inspections. With the introduction of building integrated photovoltaic (BIPV) systems (i.e., solar shingles), does the Board consider securing, flashing, sealing, and weatherproofing of the solar shingle(s) to the roof surface, electrical work?

Answer: As outlined in the July 8, 2009, Final Interpretation, Solar Photovoltaic Systems, including photovoltaic panels and their associated components, are considered electrical equipment in accordance with the definition in Article 100 and Section 690.4(B) of the National Electrical Code, and therefore determined to be “electrical work” as defined in Minnesota Statutes §326B.31, subdivision. 17. While securing, flashing, sealing, and weatherproofing of BIPV solar shingles directly to the roof surface is not considered “electrical work”, the installation of any wiring components, assemblies, connectors, or lead wires that are part of the BIPV system installation is considered “electrical work” as defined by statute.

Commentary: The Board considered this Request for Interpretation and made a determination regarding the Final Interpretation at the October 19th, 2023, regular Board meeting. All persons present who wished to speak on the topic were given a full and fair opportunity to do so. As required by Minnesota Statutes §326B.127, subdivision 5, the Board may consider this Final Interpretation for adoption as part of the Minnesota Electrical Code.

Date: October 26, 2023


Duane Hendricks, Chair
Minnesota Board of Electricity