

IBC — Structural



2015 GROUP A PUBLIC COMMENT AGENDA

SEPTEMBER 30 – OCTOBER 5, 2015
LONG BEACH CONVENTION CENTER
LONG BEACH, CA

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S2-15

[BF] 1505.9, Chapter 35

Proposed Change as Submitted

Proponent : Jonathan Roberts, UL LLC, representing UL LLC
(jonathan.roberts@ul.com)

THIS PROPOSAL WAS HEARD BY THE FIRE SAFETY COMMITTEE.

2015 International Building Code

Revise as follows:

[BF] 1505.9 Photovoltaic panels and modules. Rooftop mounted photovoltaic panel systems Rooftop-mounted *photovoltaic panel systems* shall be tested, *listed* and identified with a fire classification in accordance with UL 1703 or UL 2703. The fire classification shall comply with Table 1505.1 based on the type of construction of the building.

Add new standard(s) as follows:

UL 2703-14, Mounting Systems, Mounting Devices, Clamping/Retention Devices, and Ground Lugs for Use with Flat-Plate Photovoltaic Modules and Panels

Reason: The position of the photovoltaic panels, as well as the slope of the roof, are critical factors in determining the fire classification of a photovoltaic panel system. The position of the photovoltaic panels is established by the racking system. Thus, the testing for photovoltaic panel systems are covered in both UL 1703 and UL 2703. The new UL 2703 standard, which is an ANSI consensus standard, provides the test method for testing multiple panels for each racking system. Either standard can be used to establish a fire classification of the photovoltaic panel system.

Cost Impact: Will not increase the cost of construction
This will provide another method to test photovoltaic systems for fire classification.

Analysis: A review of the standard proposed for inclusion in the code, UL 2703, with regard to the ICC criteria for referenced standards (Section 3.6 of CP#28) will be posted on the ICC website on or before April 2, 2015.

S2-15 : [BF] 1505.9-
ROBERTS4109

Public Hearing Results

Committee Action:

Approved as Submitted

Committee Reason: The committee agreed that the new UL 2703 standard was appropriate and provides the test method for testing multiple panels for each racking system and that either standard can be used to establish a fire classification of the photovoltaic panel system.

Assembly Action :

None

Individual Consideration Agenda

Public Comment 1:

Proponent : Marcelo Hirschler, representing GBH International (gbhint@aol.com) requests Approve as Modified by this Public Comment.

Modify as Follows:

2015 International Building Code

[BF] 1505.9 Rooftop mounted photovoltaic panel systems Rooftop-mounted *photovoltaic panel systems* shall be tested, *listed* and identified with a fire classification in accordance with UL 1703 or with UL 2703 or both, as appropriate. The fire classification shall comply with Table 1505.1 based on the type of construction of the building.

Commenter's Reason: The requirements of UL 1703 and of UL 2703 can be supplementary and therefore the revised language would clarify the listing requirements.

Public Comment 2:

Proponent : Jason Wilen AIA CDT RRO, National Roofing Contractors Association (NRCA), representing National Roofing Contractors Association (NRCA) (jwilen@nrca.net) requests Approve as Modified by this Public Comment.

Modify as Follows:

2015 International Building Code

[BF] 1505.9 Rooftop mounted photovoltaic panel systems ~~Rooftop-mounted~~ Rooftop rack-mounted *photovoltaic panel systems* shall be tested, *listed* and identified with a fire classification in accordance with UL 1703 ~~or~~ and UL 2703. The fire classification shall comply with Table 1505.1 based on the type of construction of the building.

Commenter's Reason: The purpose of this public comment is to clarify S2-15. The proponent's code change allows UL 2703 to be used for rooftop-mounted photovoltaic panel systems to be tested, listed and identified with a fire classification. This would allow rooftop rack-mounted photovoltaic panel systems with photovoltaic modules that do not meet UL 1703 (the code's current requirement) to comply with IBC 2018.

The scope of UL 2703 states in Section 1.1 "...Systems, components and/or devices evaluated under this standard **may** be used to ground and/or mount a PV module **complying with UL 1703** when the specific module or frame has been evaluated for bonding/grounding or the module has been evaluated for mounting with the evaluated system, component or device." [Note: bold text in this quote is for emphasis. The bold text does not appear in the standard]

UL 2703 references UL 1703 but does not in fact require compliance with UL 1703 for PV modules used in rooftop-mounted photovoltaic panel systems. This public comment ensures that all PV modules used on rooftops will be tested, listed and identified with a fire classification in accordance with the level of performance listed in the current code.

