

April 17, 2026

Representative Chris Swedzinski
2nd floor, Centennial Office Building
658 Cedar Street
St. Paul, MN, 55155

Representative Patty Acomb
5th Floor, Centennial Office Building
658 Cedar Street
St. Paul, MN, 55155

Senator Nick Frentz
3109 Minnesota Senate Building
95 University Avenue W
St. Paul, MN, 55155

RE: HF3555/SF3873 Installation and operation of a plug-in solar photovoltaic device regulated

Dear Chairs Swedzinski, Acomb, and Frentz,

The Department of Labor and Industry (DLI) has been engaged in providing technical assistance on HF3555/SF3873. DLI remains neutral on the legislation and offers the following clarification regarding electrical safety requirements.

All electrical equipment used or installed in the state is required to be listed and certified by a nationally recognized testing laboratory. This listing and certification process ensures that electrical devices meet established safety standards and serves as the primary mechanism for evaluating the safety of equipment prior to use.

The proposed legislation acknowledges that plug-in photovoltaic (PIPV) systems must meet the same listing and certification requirements as any other electrical device. Based on our review, we are satisfied that the Underwriters Laboratories 3700 Outline of Investigation provides an appropriate safety framework for evaluating this type of equipment. The standard clearly states that all applicable requirements of the National Electrical Code must be met. The department is not aware of any PIPV systems that have yet been listed or certified.

That said, the installation instructions for a PIPV system may require additional premise wiring that must be completed to ensure safe operation. In such cases, the department's existing licensing and inspection requirements would apply.

Additionally, the Department submitted public input proposals to the National Fire Protection Association to participate in the discussions regarding the interconnection of these systems to existing premise wiring systems.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dean Hunter".

Dean Hunter

Chief Electrical Inspector & Assistant Director, Construction Codes and Licensing Division

cc: Representative Larry Kraft
Senator Rob Kupec