



INTERNATIONAL CODE COUNCIL
San Diego Area Chapter
Reinstallation of Roof Mounted Photovoltaic System
After Roof Covering Replacement

Chapter Policy
Electrical
E-02

March 2020

The 2019 California Electrical Code does not have a provision to allow the reinstallation of existing permitted electrical equipment where code requirements may have changed. Existing roof mounted photovoltaic systems that were permitted, inspected and finalized need to be removed for roof maintenance. Typically, this occurs on a re-roof project. In some cases, code changes have occurred creating a code conflict for permitting the reinstallation of an older PV system.

Article 90.4 California Electrical Code does allow the AHJ to permit an alternative method where specific rules are not established. Within the California Electrical Code, the Informative Annex H 80.9(B) provides informative guidance on this matter. Existing Installations that do not comply with the provision of the current code shall be permitted to remain in use unless the AHJ determines the lack of conformity with current code presents an imminent danger to occupants. The permitting process to re-roof or repair a roof that necessitates the removal of existing PV equipment warrants a local policy. This policy is consistent with the recommended guidelines of the Sustainable Energy Action Committee ([SEAC](#)), a coalition of California Building/Fire Officials, and Industry Professionals.

Policy/Interpretation/Requirements:

It is the opinion of the San Diego Area ICC Electrical subcommittee that a roof mounted photovoltaic system which had been permitted and finalized can be removed and reinstalled by a permit issued by the AHJ.

The permit application shall include the following:

1. A copy of the original finalized permit/ inspection approval
2. A copy (digital or paper) of the original

approved plans or if the plans are missing and you have verified with the AHJ that a copy is not available, pre-removal photographs of the existing system may be accepted.

3. Pre-Removal inspection of the existing system may be required by the AHJ.
4. Applicable Code Cycle shall be referenced on the application.

Discussion:

This policy provides guidance to Building Officials when considering the issuance of a permit for the reinstallation of an existing roof mounted PV system provided it is safe to be reinstalled. It is not intended to allow any alterations, additions or other modification to an existing system. The policy is solely for the installation of a removed system where a roof is being repaired, replaced or reroofed per California Building Code chapter 15. The reinstallation of the PV system must be performed by qualified personnel such as C46 Solar contractor or C-10 Electrical contractor. This policy does not recognize a C39 roofing contractor as qualified to perform this work. Once a permit has been issued, the jurisdiction will perform the necessary inspections for the reinstallation of the system.

Applicable Codes:

Re-roofing requirements are covered in CBC Section 1511, existing installations of electrical equipment are permitted to remain in use per 80.1(B) (Annex H) and 90.4 enforcement of the California Electrical Code.

Goals:

- Remove unnecessary barriers for property owners and contractors to allow the necessary roof repair/ replacement and re-installation of the

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existing photovoltaic system(s).

- Utilize existing jurisdiction fee schedules to minimize or eliminate the need to create a new category for a re-establishment permit.
- Minimize or eliminate the need for additional plan reviews, multiple inspections, and/or excessive paperwork for a system which was previously permitted, inspected and approved.
- Create a process for inspectors to easily verify that the reinstalled system still meets the applicable code requirements for which it was originally installed.

Safety Concerns:

The following questions/concerns need to be addressed when removing and re-installing a solar photovoltaic system:

- Is the reinstalled system in compliance with all applicable code requirements in effect when originally permitted?
- Are qualified personnel performing the removal and reinstallation of the system?
- Is the photovoltaic system installed in accordance with the manufacturer's installation instructions?
- Is the photovoltaic system properly labeled for first responders and technicians?
- Can the structure support the additional weight and uplift of the existing system?
- Are all penetrations of the roof properly flashed/ sealed and are all roof attachments properly fastened?

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