



North Central Texas  
Council of Governments  
**Regional Codes Coordinating Committee**

**Opinion Statement**

**2021 International Energy Conservation Code Appendix RB and 2021 International Residential Code Appendix AT, Solar-Ready Provisions – Detached One- and Two-Family Dwellings and Townhouses**

The Regional Codes Coordinating Committee (RCCC) of the North Central Texas Council of Governments (NCTCOG) recommends jurisdictions consider adopting the 2021 International Energy Conservation Code (IECC) Appendix RB and 2021 International Residential Code (IRC) Appendix AT, Solar-Ready Provisions – Detached One- and Two-Family Dwellings and Townhouses, herein referred to as “Solar-Ready Provisions.”

A Solar-Ready Zone is a section or sections of the roof or building overhang designated and reserved for future installation of a solar photovoltaic or solar thermal system. The Solar-Ready Provisions *do not* require installation of a PV system at the time of construction. Adoption of the Solar-Ready Provisions can make future PV system installations more cost-effective by reducing the need for future infrastructure upgrades, ensuring technical feasibility, and planning for system optimization.

Cities may choose whether to adopt the Solar-Ready Provisions of the 2021 IECC and IRC and they are not required to adopt these appendices if they adopt the 2021 IECC or IRC. At the request of NCTCOG staff, the Energy and Green Advisory Board (EGAB) reviewed Appendix RB of the 2021 IECC and concurred with one amendment that would be relevant to both Appendices. The Fire Advisory Board and the Building and Residential Board both concurred with EGAB’s review and recommended amendment:

**Recommended Amendment:** Strike subsection “RB103.7 Roof Load Documentation: The structural design loads for roof dead load and roof live load shall be clearly indicated on the construction documents.”

**Amendment Rationale:** Roof load requirements of new construction are sufficient to accommodate the nominal additional weight of solar panels, so that structures built to new structural standards are inherently capable of supporting any additional load.

Jurisdictions interested in reducing the barriers to solar adoption can consider adoption of the Solar-Ready Provisions to streamline their jurisdictional processes and provide consistency amongst local governments in the region. Adoption of the Solar-Ready Provisions supports NCTCOG regional priorities associated with adoption of renewable energy systems, improve air quality, improve grid resiliency, reduce costs to go solar, and to support regional standardization.

Should you have questions regarding the contents of this Opinion Paper, please contact the NCTCOG Environment and Development Department at [EandD@nctcog.org](mailto:EandD@nctcog.org).

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**Commented [TC1]:** Per RCCC Bylaws:  
**A Position Paper** is a collection of opinions representing different perspectives on a codes issue.  
**An Opinion Statement** is a written RCCC or Advisory Board opinion to an individual, organization, or locality, which at staff’s discretion might be submitted to the Executive Board for approval.

Position Papers and Opinion Statements may consist of: 1. An Advisory Board’s interpretation of an unclear section of a code. 2. An Advisory Board’s opinion of a local amendment that was sent to the Advisory Board by a locality for review and comment. This would include the reasons for the opinion and possible alternative wordings. 3. An Advisory Board’s opinion of a proposed code change for a code publisher’s subcommittee or private organization. This opinion is to be construed only as advice and not as the official position of the Advisory Board, RCCC, or Executive Board.

**Commented [DG2]:** Comment from July RCCC Meeting: Speak to modern roof assembly and roof load safety in this paragraph.

Requesting feedback/expertise from EGAB members

**Commented [DG3]:** Per the May EGAB meeting, 20 EGAB subcommittee members voted to include this amendment.

However, a comment was made during the July RCCC Meeting that subsection “RB 103.8 Roof Load Documentation” should not be removed due to concern over associated safety issues and potential issues related to roof sagging.

**Commented [DG4]:** Comment from July RCCC Meeting: Amendment proposed to strike the following subsections:  
-RB 103.2 Construction document requirements for solar-ready zone  
-RB 103.3 Solar-ready zone area  
-RB 103.4 Obstructions  
-RB 103.10 Construction documentation certificate

Requesting feedback/discussion from EGAB members for rationale on the proposed amendment

**Commented [DG5]:** Comment from July RCCC Meeting: Remove the last sentence of paragraph 4