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Oxford Intelligent Energy Comments Regarding Solar Equipment Lists Guidelines Update

Oxford Intelligent Energy appreciates the opportunity to provide comments regarding the proposed updates to the California Solar Equipment Lists (SEL) Program Guidelines.

Oxford Intelligent Energy is a California-based solar, energy storage, and EV infrastructure contractor actively engaged in residential and light commercial PV and ESS deployment projects throughout California. Our company regularly interfaces with utility interconnection processes, SGIP program implementation, permitting authorities, and equipment compliance requirements associated with CEC-listed equipment.

Based on practical field implementation experience, we respectfully provide the following comments and recommendations.

1. Support for Development of PCS (Power Control System) Guidelines

We strongly support the CECâ€™s proposal to add formal Guidelines content for Power Control Systems (PCS).

As utilities increasingly require export control verification, advanced inverter functionality verification, and grid-support functionality during PTO review processes, PCS functionality has become a critical component of modern distributed energy resource systems.

We recommend that the CEC establish a clear and flexible PCS framework that reflects modern inverter-based system architectures currently deployed in the California market.

2. PCS Functionality Should Be Allowed at the Inverter Level

We respectfully recommend that PCS functionality be permitted and recognized at the inverter level, rather than only at the complete ESS system level.

In many modern hybrid inverter architectures, PCS functionality is implemented primarily through inverter firmware, export-control logic, and software-based power management systems.

Restricting PCS recognition only to specific ESS combinations may unintentionally:
- Limit compatibility with different battery capacities
- Restrict future battery expansion
- Increase administrative complexity

- Create unnecessary PTO review complications
- Reduce installer flexibility

Allowing inverter-level PCS recognition would better reflect real-world system implementation and improve long-term compatibility across multiple ESS configurations.

3. Support for Software-Limited Output Architectures

We encourage the CEC to recognize software-limited inverter configurations within the Solar Equipment Lists framework.

Modern inverter manufacturers increasingly utilize common hardware platforms with configurable software-defined export limits or output limits (for example: 7.6kW, 10kW, or 11.4kW configurations using the same hardware platform).

Recognition of software-limited configurations would:
- Improve utility interconnection flexibility
- Reduce unnecessary hardware variations
- Improve supply chain efficiency
- Reduce project costs
- Better support varying service panel limitations and utility requirements

This model is increasingly common across the distributed energy industry and should be formally accommodated within the SEL structure.

4. Improved Visibility of Advanced Inverter and Export-Control Functions

Utilities increasingly request verification of:
- Volt-VAR functionality
- Volt-Watt functionality
- Export control capability
- PCS capability
- Grid-forming functionality
- IEEE 1547-related functions

However, current listing structures do not always clearly communicate these capabilities to utilities, AHJs, or contractors.

We recommend the CEC consider standardized indicators or fields for:
- PCS-enabled systems
- Export-capable systems
- Grid-forming capable systems
- Advanced inverter functionality
- Utility export-control compatibility

Improved visibility would reduce:

- PTO delays
- Utility reviewer inconsistencies
- Installer confusion
- Administrative burden on customers and contractors

5. Battery Scalability and ESS Flexibility

We encourage the CEC to support listing structures that allow reasonable battery scalability without requiring entirely separate listing pathways for every battery quantity variation.

Many modern ESS systems are modular by design and allow battery expansion while maintaining identical inverter hardware, PCS functionality, and safety architecture.

More flexible listing structures would:
- Better support real-world deployment
- Improve long-term customer usability
- Reduce administrative burden
- Better align with evolving ESS technology trends

6. Archive Equipment List and Certification Updates

We understand the CECâ€™s concerns regarding outdated certifications and inactive product listings.

However, we respectfully recommend that manufacturers continue receiving notification prior to equipment being moved to archive status.

In practice, many products remain operationally safe and actively deployed while manufacturers are transitioning between certification updates or awaiting NRTL processing timelines.

Immediate archival without notification may create:
- Utility interconnection confusion
- Existing project delays
- Customer uncertainty
- Administrative burden for contractors and AHJs

We recommend a reasonable transition and notification process before archival actions occur.

Conclusion

Oxford Intelligent Energy appreciates the CECâ€™s continued efforts to modernize Californiaâ€™s Solar Equipment Lists Program and support safe, flexible, and grid-supportive distributed energy deployment.

We respectfully submit these comments based on practical implementation experience across utility interconnection, ESS deployment, SGIP program participation, and field installation operations throughout California.

We believe these recommendations would improve long-term compatibility, reduce administrative burdens, and better align the SEL framework with the rapidly evolving distributed energy industry.

Thank you for your consideration.

Sincerely,