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Ingeteam

CEC RFI: SOLAR EQUIPMENT LISTS GUIDELINES
UPDATE (DOCKET 26-SOLAR-01)

Table of contents

1	Should the CEC continue making the calculated value for the Photovoltaics for Utility Scale Applications (PVUSA) Test Conditions (PTC) rating of a PV module available?	3
2	When staff find equipment on the SEL that does not have a current certificate of compliance, should it be moved to an archive list without notifying the manufacturer?	4
3	Closing.....	5

1 Should the CEC continue making the calculated value for the Photovoltaics for Utility Scale Applications (PVUSA) Test Conditions (PTC) rating of a PV module available?

Recommendation: Yes, the CEC should continue making the calculated **PTC rating** available, while modernizing the data pathway to reduce manufacturer burden and reliance on withdrawn test procedures.

Why keep PTC available

- PTC remains a practical, transparent value used by stakeholders as a proxy for **real-world operating conditions** and for estimating **AC capacity** using established methods (e.g., module count × PTC × weighted inverter efficiency).
- Eliminating PTC without a clear and consistent replacement may lead to inconsistent derating practices across utilities/jurisdictions and reduce comparability across equipment.

How to address NOCT cost / test availability concerns Because NOCT measurement is tied to withdrawn IEC procedures and lab availability is declining, we recommend the CEC adopt a **dual-path approach**:

1. **Grandfathering / no re-test for legacy listings**
Keep publishing PTC for modules already listed with valid underlying data, and do not require re-testing solely to maintain PTC unless there is a major design change.
2. **CEC default derate pathway when NOCT is not reasonably available**
Allow manufacturers to opt into a CEC-defined **default PTC/STC factor** (or technology-class factors) when NOCT testing is not available at reasonable cost/time.
 - The factors could be based on the CEC's existing dataset averages (by technology and/or BIPV vs non-BIPV, and potentially by power class).
 - The SEL should clearly label whether a module's PTC is **NOCT-based** vs **default-based** for transparency.
3. **Avoid using inverter max AC output as the sole substitute**
Using inverter maximum AC output as a proxy for PV array AC capacity can be misleading depending on DC/AC ratio and clipping assumptions, and should not replace PTC as a standardized module performance reference.

Conclusion for Question (1): Maintain PTC, but provide a **practical alternative compliance pathway** to avoid dependence on withdrawn NOCT testing

2 When staff find equipment on the SEL that does not have a current certificate of compliance, should it be moved to an archive list without notifying the manufacturer?

Recommendation: No—equipment should **not** be moved to an archive list without notifying the manufacturer. A simple notice-and-cure process improves accuracy and prevents unintended disruptions.

Why manufacturer notification is important

- Certification databases and product listings can contain administrative delays or discrepancies (model naming conventions, certificate updates in progress, NRTL listing latency). Immediate archiving without notice increases risk of erroneous removals.
- Sudden archiving can create avoidable challenges for permitting/interconnection for customers and EPCs using SEL data.

Suggested improved approach (efficient and scalable)

1. Automated notification + cure window

Notify the manufacturer electronically when certification is found non-current and provide a defined response window (e.g., **15–30 calendar days**) to submit updated documentation.

2. Clear timing after new edition effective date

After a new standard edition becomes effective, initiate review at the effective date, but apply enforcement with a reasonable transition (for example **12 months after the effective date**) unless:

- the NRTL explicitly indicates the certification is withdrawn/invalid, or
- there is a safety-related reason requiring immediate action.

3. Archive list usability

If equipment is archived, ensure the archive list retains sufficient fields (ideally parity with SEL fields) so users can still identify model numbers and certification status/history.

Conclusion for Question (2): Keep the SEL accurate but use **notice + short cure period** rather than archiving without manufacturer notification.

3 Closing

We appreciate the CEC's consideration of these comments and would welcome continued engagement as staff develops proposed modifications to the SEL Guidelines later in 2026.

Sincerely,

Ingeteam Power Technology.