DOCKETED	
Docket Number:	26-SOLAR-01
Project Title:	Solar Equipment List Program Implementation
TN #:	270534
Document Title:	REC Group Comments - Docket No 26-SOLAR-01 California Energy Commission's Solar Equipment Lists Request for Information – Comments from REC
Description:	N/A
Filer:	System
Organization:	REC Group
Submitter Role:	Public
Submission Date:	6/10/2026 7:34:50 PM
Docketed Date:	6/11/2026

Comment Received From: REC Group
Submitted On: 6/10/2026
Docket Number: 26-SOLAR-01

Docket No 26-SOLAR-01 California Energy Commissionâ€™s Solar Equipment Lists Request for Information â€“ Comments from REC

Additional submitted attachment is included below.

June 11, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

California Energy Commission

Re: Docket No. 26-SOLAR-01 California Energy Commission's Solar Equipment Lists Request for Information – Comments from REC

Query #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?

REC Response:
CEC should continue to make PTC module ratings available:

1. As CEC itself has noted, the PTC rating is heavily integrated into the industry (e.g., utilities). For example, major California Investor-Owned Utilities (PG&E, SCE, and SDG&E) alongside dominant residential/commercial design platforms (Aurora, HelioScope) have the term "PTC" hardcoded into their software. Removing the PTC rating will have negative implications on the industry; PTC rating ought to be retained. However, we agree that the current formula for PTC needs to change to keep abreast with the latest industry test methods.
2. At the same time, we do not recommend the use of generalized standard values, as doing so penalizes advanced cell technologies by grouping them with older cell technologies.
3. Instead, we propose an updated formula like this example: Array AC Capacity (PTCe) = P_{STC} x Technology De-rate Factor x [1+{y_{Pmax} x (T_{CEC} - 25ºC)}]
    1. P_{STC} is the module power at STC, i.e., the nameplate Pmax.
    2. Temperature Coefficient (y_{Pmax}): Thermal coefficients heavily dictate real-world energy yields. Retaining this parameter is critical to accurately valuing modules that perform better at real world temperatures above the STC temperature.
    3. Technology De-rate Factor: To allow asset owners to distinguish higher-performing cell structures, the CEC could poll manufacturers and leverage historical performance data by cell type (while filtering out legacy, obsolete models) to establish appropriate, technology-specific de-rate factors.
    4. Standardized Operating Temperature (T_{CEC}): Represents a typical average operating temperature reflective of California conditions. This can be aligned with recognized standards such as the T_{98} temperatures defined in IEC 63126 Ed. 1 and UL 61730-1 Ed. 2.
    5. The use of the term "PTCe" is a possible way to address point 1), because it retains "PTC" as a term.

Query #2: When staff find equipment on the SEL that does not have a current certificate of compliance for the CEC required national safety standard, should the equipment be moved to an archive equipment list without notifying the manufacturer?

REC Response:
We are of the opinion that CEC should not archive equipment without prior manufacturer notification. Instead, we propose a two-step mass communication protocol
1) Upon the publication or adoption of a new safety standard edition, mass communication can be issued to all listed applicants requesting applicants to re-list their products under the latest standard edition by a clearly defined deadline.

2) After the older standard edition is officially withdrawn – and following a targeted, final notification to the affected applicants – should models under the old standard be archived.

Yours sincerely

REC GROUP (REC SOLAR PTE. LTD.)