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Clean Power Research RFI Response - Solar Equipment Lists Guidelines Update

Additional submitted attachment is included below.

RFI Response – Solar Equipment Lists Guidelines Update

Respondent Information

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Question 1

Should the CEC continue making the calculated value for the PTC rating of a PV module available?

CPR Response: As the guiding documentation alludes to, Clean Power Research primarily uses the PV module PTC value within PowerClerk® to estimate total energy production for a given system over a typical year of weather data. We also provide utilities with aggregate STC and PTC ratings for the system, and total AC capacity for the PV inverters. Total AC capacity for the inverters is the preferred method amongst our utility customers; however, some do also utilize the module PTC rating within their processes. This is a valuable feature for our utility customers that we will need to continue to provide in some way. With that said, applying a more generalized PTC/STC derate ratio as outlined in Table 1 of the RFI document is an acceptable alternative. In the event a derate value is used we would prefer that that derate value and/or the estimated PTC value be included as a new column in the CEC PV Module list to improve transparency for the manufacturers and for our end customers.

If no, why not?

CPR Response: The alternative approach to arrive at a PTC rating via historical equipment derate ratios will likely be acceptable by our utility customers. Clean Power Research would need to make its customers aware of the new definition and would be willing to share feedback with the CEC.

Are the suggested alternatives satisfactory for estimating AC capacity?

CPR Response: Yes, specifically the PTC/STC derate ratio, with the estimated PTC value as an available column would be the preferred alternative for Clean Power Research and PowerClerk.

Are there other suggested alternatives or use cases to consider?

CPR Response: In a few instances, utilities have continued leveraging the estimated production calculation we provide to calculate the total incentive or rebate available for a given system. Utilities are very careful to ensure all applications are treated equally and provided fair incentive amounts. They would want to understand how this change would impact the total incentive calculation. The PTC value is also used as a parameter for our solar industry products, with use cases ranging from individual residential installations to simulations for utility-scale portfolio analysis. If the alternative of applying a PTC/STC derate ratio is utilized, this impact will be low. If PTC is no longer offered and we utilize STC instead, the impact could be much larger.

Question 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?

CPR Response: CPR doesn't object to the removal of equipment for lack of a current certification without notifying the manufacturer but would like any equipment moved off the primary equipment list for that reason to be clearly marked. As a broad policy at Clean Power Research, we prefer to have the option to list old equipment as we have a broad reach to many utilities with different requirements for equipment in their programs. The most important piece of the proposed archival process from our perspective is that a model's removal for certification reasons is clearly denoted in some way. This could be satisfied by having its own archive file with parallel format to the typical files. We are less concerned with the specifics of what is removed and more concerned with it being easy to identify when models are removed from the standard list for certification expiration versus when models are removed for unrelated reasons.

Additional Items (Attachment A)

For all questions regarding increasing the specificity of certifications required for listing in a certain CEC listed category or removing existing data fields.

CPR Response: Clean Power Research prefers these equipment lists be as expansive and detailed as possible. This allows us to maintain lists that are broadly applicable to several utilities both within California and in the rest of the country. Each utility can implement more strict controls, but if we stop providing as many models or as detailed information, we are unable to give utilities flexibility.

Remove references to closed incentive programs and equipment types no longer relevant, including removal of the Other Solar Electric Generating Technology (OSEGT) list.

CPR Response: Clean Power Research would be interested in seeing the equipment being removed, if it is more than the OSEGT list, to understand if we need to proactively prepare.

Photovoltaic (PV) Modules

f UL 1703 is withdrawn from active standard status, all modules without a UL 61730-1 and UL 61730-2 certificate of compliance will be archived 12 months after the date of withdrawal.

CPR Response: Again, as with other archival procedures we would prefer the data format remain parallel to the main files, the removed models be placed on their own list, and for there to be some mechanism for us to decipher if a model is removed for this compliance related reason or other reasons.

Inverters

Inverter submittals to the SEL require UL 1741 Supplement B. Submittal of UL 1741 Supplement A documentation no longer allowed.

CPR Response: We want the lists to be as broadly applicable as possible, because it is the best source for solar and storage equipment within the US. Many utilities still accept UL 1741 SA inverters and value the accuracy the CEC provides on SA only models.

Update inverter list format:

Merge solar inverter and battery inverter lists into a single inverter list.

CPR Response: We support the merger of the lists. This will help reduce confusion for our users or manufacturers trying to identify models on the CEC list and track them to our software to ensure the sources match.

Replace hybrid yes/no field with source type yes/no fields (PV, battery, other)

CPR Response: Clean Power Research supports this change and will be able to handle most data changes to the list, including in this case. We do request as much advance notice as possible to prepare our automated processing for such changes.

Energy Storage Systems (ESS)

Clarify that DC ESS and AC ESS can be submitted to the SEL.

CPR Response: This would be very helpful for utilities moving forward. We would be able to improve the specificity of our equipment listings to customers and restrict users from attempting to combine pieces of equipment that aren't compatible.

Treat battery expansion packs as batteries.

CPR Response: CPR strongly supports this change. Functionally, these ESS expansion packs are batteries and treating them as such would eliminate some confusion for manufacturers and customers.

Additional Comments

CPR Response: Clean Power Research continues to leverage the CEC solar equipment lists within our flagship utility workflow automation software PowerClerk®, our energy forecasting software SolarAnywhere®, and across a number of other products and services. The continual maintenance and availability of these lists benefits many utilities and energy agencies across the entire nation through their ability to offer energy programs to customers that only allow for safe and reliable equipment installation. We greatly appreciate the CEC's dedication and diligence in continuing to offer this resource publicly. We look forward to the future enhancements proposed both in the main RFI and attachment A.