

DOCKETED

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Subject: CEC Docket 26-SOLAR-01

As a supplier of PV modules and BIPV modules, CertainTeed appreciates the opportunity to comment on the subject of the Solar Equipment Lists Guidelines Update.

In regards to question #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?*

It is CertainTeed's opinion that the PTC rating no longer be required due to difficulty and expense associated with obtaining the NOCT test data.

Our concern with using the PTC/STC ratio based on historical PTC ratings by product category, is that for the BIPV category, there are design factors including installed distance between the roof and the module that influence the temperature and operation of the BIPV module that are not taken into consideration.

Our recommendation would be to replace the PTC rating with the inverter maximum AC output capacity.

In regards to 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?*

CertainTeed's opinion is that the CEC should maintain their practice of contacting manufacturers to obtain current COC's prior to moving the equipment to archive status. Allowing manufacturers a chance to respond and provide an up to date COC can prevent any unnecessary permitting delays due to equipment moved to archive status preemptively.

Regards,

CertainTeed Solar