

DOCKETED

Docket Number:	26-SOLAR-01
Project Title:	Solar Equipment List Program Implementation
TN #:	270664
Document Title:	First Solar Comments - CEC questions - FSLR response
Description:	N/A
Filer:	System
Organization:	First Solar
Submitter Role:	Public
Submission Date:	6/17/2026 10:22:33 AM
Docketed Date:	6/17/2026

Comment Received From: First Solar

Submitted On: 6/17/2026

Docket Number: 26-SOLAR-01

CEC questions - FSLR response

First Solar Inc. Comments on CEC Questions

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?

☞ First Solar supports the continued use of the PTC rating as a valuable metric for estimating PV module performance under real-world operating conditions.

☞ Opportunity for Performance Updates

Manufacturers should be allowed to voluntarily retest and resubmit updated performance data where improvements have been achieved. This ensures that updated module designs or process enhancements can be accurately reflected in SEL listings, rather than being constrained by legacy (‘‘grandfathered’’) values.

☞ Transparency in PTC Calculation Methodology

If the CEC allows flexibility in calculating PTC—such as permitting either:

- o a default PTC-to-STC ratio, or
- o a calculation based on measured NOCT values

then it is important that the Solar Equipment List (SEL) clearly identify whether the PTC rating is:

- o NOCT-based (measured), or
- o Default-based (assumed ratio)

Question 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?

1. Notification and Response Process

First Solar recommends that manufacturer notification be required prior to any action on SEL status.

When certification is identified as expired or out of date, the CEC should:

- o Notify the manufacturer electronically, and
- o Provide a defined response period (e.g., 30 calendar days)

In cases where discrepancies arise (e.g., misalignment between models listed in the SEL and those covered under certification documentation), manufacturers should be allowed to:

- o Provide explanations and corrective actions, and
- o Be granted a reasonable remediation period of up to 6 months to submit updated certification documentation.

To support effective communication, the CEC should implement a manufacturer contact management platform, allowing manufacturers to:

- o Maintain up-to-date contact information
- o Designate responsible points of contact for certification and compliance matters

This ensures that notifications are reliably received and addressed in a timely manner.

2. Timing for Certification Updates Following New Standard Editions

First Solar recommends a clear and structured transition timeline when new standards are issued.

• Upon publication of a new standard edition:

- o Review may begin at the effective date, but
- o Enforcement should include a defined transition period

• A transition period of approximately 24 months from the effective date is recommended to:

- o Allow sufficient time for testing, certification updates, and documentation
- o Account for laboratory capacity constraints and scheduling
- o Support orderly product transition without disrupting ongoing projects