

**DOCKETED**

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*Comment Received From: Dara Yung  
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**CALSSA Comments on Solar Equipment Lists Request For Information Guidelines Update**

*Additional submitted attachment is included below.*



June 17, 2026

California Energy Commission  
715 P Street  
Sacramento, CA 95814

Re: Docket No. 26-SOLAR-01—Comments on Solar Equipment Lists Request For Information Guidelines Update

California Energy Commissioners and Staff:

The California Solar & Storage Association (CALSSA) appreciates the opportunity to provide comments in response to the California Energy Commission's (CEC) Solar Equipment Lists Request for Information Guidelines Update. CALSSA welcomes the Commission's efforts to improve, clarify, and streamline the Solar Equipment Lists (SEL). The SEL plays an important role in supporting the solar industry, utilities, regulators, and consumers, and CALSSA appreciates the opportunity to provide feedback on the proposed updates.

**CALSSA's Response to Question (1):**

CALSSA requests that the CEC continue making the calculated value for the Photovoltaics for Utility Scale Applications (PVUSA) Test Conditions (PTC) rating of a PV module available.

CALSSA recognizes the increasing challenges and costs associated with obtaining the laboratory testing necessary to calculate PTC ratings, including measurement of module Nominal Operating Cell Temperature (NOCT). However, PTC ratings remain an important input to the calculation of CEC-AC system size, which continues to be used by California's large investor-owned utilities (IOUs) to determine eligibility for the Fast Track Interconnection Review Process under Rule 21.<sup>1</sup> As long as CEC-AC system size remains a utility requirement for interconnection applications, continued availability of CEC-maintained PTC ratings provides important consistency and transparency for developers, utilities, and customers.

The question of whether to discontinue publication of PTC ratings may be premature. If the California Public Utilities Commission (CPUC), California IOUs, and other stakeholders determine that CEC-AC system size is no longer needed for interconnection or other regulatory purposes, it may then be appropriate for the CEC to reconsider maintaining the PTC calculation.

However, the Solar Equipment Lists (SEL) are widely used beyond the California IOUs, and there may be other utilities in California and other states that continue to rely on CEC-AC system size or PTC ratings for planning, interconnection, incentive, or program administration purposes.

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<sup>1</sup> CEC-AC System size pursuant to California Public Utilities Commission D.19-03-013, footnote 43 on p. 22

In addition, maintaining continuity with historical system ratings is important. Existing systems may be modified or expanded by up to 1 kW or 10 percent of their original CEC-AC rating while preserving Net Energy Metering (NEM) grandfathering status. This flexibility is important for the maintenance and repair of existing systems. If the methodology used to calculate CEC-AC changes significantly, comparisons between existing and modified systems may no longer be equivalent, potentially creating uncertainty and administrative complications.

CALSSA suggests a slight modification to the CEC proposal under which manufacturers adding new modules to the SEL may either provide NOCT data or utilize a CEC-determined PV module derate factor. However, before adopting a fixed-factor approach, the CEC should expand its analysis beyond average ratios by module type and conduct a statistical analysis of the distribution of historical PTC/STC ratios, including whether there are identifiable trends over time. Such an analysis would help determine whether a fixed factor can accurately represent current and future module technologies and whether periodic updates to the factor may be necessary to maintain accuracy. The CEC may have already performed this analysis as part of its evaluation of the proposal. If so, publishing the analysis and supporting data would help stakeholders better understand the basis for the proposed methodology and build confidence in its adoption.

CALSSA recommends that the CEC continue publishing PTC ratings while further evaluating long-term alternatives and the continued need for CEC-AC system size in utility and regulatory applications.

### **CALSSA's Response to Question (2):**

The CEC should notify the manufacturer before any equipment is moved to an archived equipment list. Staff should provide the reasoning for the proposed change and allow the manufacturer sufficient time to respond, clarify, or correct the record.

Information regarding a product's certificate of compliance is not always publicly available or reflected in an NRTL's online database. In some cases, manufacturers intentionally delay publication of updated certifications until they are prepared to release them publicly.

In addition, each NRTL may establish different transition timelines for compliance with revised standards. For example, one NRTL may require updated certification within 12 months while another may allow an 18-month transition period. It is unclear how CEC staff would independently track and administer varying transition schedules across multiple NRTLs and standards.

The publication date of a standard also does not necessarily align with the legally enforceable effective date of that standard in California. Standards frequently undergo revisions that do not result in a new edition number. For example, UL 9540 Edition 3 was published on June 28, 2023, but subsequently incorporated revisions through March 7, 2025. In California, the

applicable effective date is ultimately tied to adoption by the California Building Standards Commission (CBSC). UL 9540 Edition 3 was adopted as part of the 2025 California Building Standards Codes and became effective for projects submitted for permitting beginning January 1, 2026.

Staff should therefore avoid automatically archiving equipment solely because a newer edition of a standard has been published. The more appropriate trigger to archive equipment would be California's triennial code adoption cycle, or when decisions affecting equipment standards for Rule 21 are issued by the California Public Utilities Commission.

It is also important to distinguish between products that are no longer compliant with current California requirements and products whose listing status changed for unrelated administrative reasons. For example, if a manufacturer goes out of business, ongoing factory inspections and maintenance fees may cease, resulting in withdrawal of the certification listing from the NRTL database. However, products manufactured prior to the withdrawal still retain valid certification.

Additionally, the various Solar Equipment Lists do not uniformly track all applicable safety standards. Some lists focus only on specific compliance criteria. For example, the inverter list primarily focuses on interconnection requirements associated with UL 1741 SB certification rather than every safety standard applicable to the product. If CEC staff intend to archive products based on the absence of specific newer requirements, such as UL 1741 SB, that approach may be reasonable provided the agency clearly identifies which compliance criterion is being evaluated and why older criteria are no longer acceptable for California installations.

Rather than removing or archiving equipment entries, the CEC should consider maintaining equipment on the SEL while providing additional information regarding the compliance criteria being evaluated. For example, the CEC could identify the applicable standard and edition, whether the equipment complies with the current California requirements, and whether the product has been superseded by a newer certification. This approach would improve transparency, preserve historical information, provide greater certainty for manufacturers and permitting authorities, and reduce the risk of inadvertently removing equipment that remains compliant and eligible for installation.

The CEC should also consider the method of notification to manufacturers whose equipment may be archived. CALSSA recommends that staff send a written notice by postal mail to the company address on record, in addition to notifying the original applicant by email. The original applicant may no longer be employed by the company, making email notification alone insufficient to ensure that the manufacturer receives timely notice. To further improve transparency, the CEC could identify equipment undergoing review for potential archiving directly on the SEL. Providing a visible status indicator would alert manufacturers, installers, and other stakeholders that a product's eligibility is under review and allow interested parties to monitor the process before any final action is taken.

Finally, many agencies and jurisdictions outside California reference the CEC Solar Equipment Lists for informational purposes, even though they may operate under different utility requirements, standards adoption schedules and effective dates. As a result, changes to equipment status on the SEL can have impacts beyond California. Any decision to archive equipment should therefore be implemented with appropriate manufacturer involvement, a clear explanation of the basis for the action, and sufficient transition time to minimize unintended market disruption and stakeholder confusion.

Respectfully,

/s/ Dara Yung

Dara Yung  
Director of Codes, Standards, and Permitting  
California Solar & Storage Association