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Pacific Gas and Electric Company Comments - PG&E Comments on Solar Equipment Lists RFI “ Guidelines Update (TN270503)

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?

A) PG&E recognizes there are tradeoffs in deciding whether to continue to use long-standing existing approaches. PG&E respectfully requests that the CEC seek alignment with the CPUC on this topic, as CPUC has recently decided in Resolution E-5436 on an approach for reporting purposes in the state-wide DG Stats platform, which is supplied with data that the utilities collect in their interconnection processes. As E-5436 changes the data being collected, the IOUs will need to change interconnection tools and processes, and DG-related datasets will reflect multiple types of data. Such a transition will need to be managed carefully to minimize impacts to data quality and interconnection processes and the PTC may still be information that should be retained. PG&E has no further comments on these topics at this time.