

DOCKETED	
Docket Number:	26-SOLAR-01
Project Title:	Solar Equipment List Program Implementation
TN #:	270802
Document Title:	Enphase Energy, Inc. Comments - Enphase Energy Comments on CEC SEL RFI
Description:	N/A
Filer:	System
Organization:	Enphase Energy, Inc.
Submitter Role:	Public
Submission Date:	6/18/2026 10:16:26 AM
Docketed Date:	6/18/2026

*Comment Received From: Enphase Energy, Inc.
Submitted On: 6/18/2026
Docket Number: 26-SOLAR-01*

Enphase Energy Comments on CEC SEL RFI

Additional submitted attachment is included below.



June 17, 2026

**To: California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814**

From: Enphase Energy

Re: Docket No. 26-SOLAR-01 – Enphase Energy Response to CEC Request for Information on Solar Equipment Lists Guidelines Update

Dear Commissioners and Staff:

Enphase Energy, Inc. (Enphase) respectfully submits the below response to Question No. 2 in the California Energy Commission's (CEC or Commission) Request for Information (RFI) regarding the Solar Equipment Lists (SEL) Guidelines Update.

Question No. 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?

Enphase Response:

Enphase does not support moving equipment from the SEL to an archive list without first notifying the manufacturer. Manufacturers and Nationally Recognized Test Laboratories (NRTLs) are best positioned to determine whether an existing certification remains valid following the adoption of a new edition of a safety standard. A product that is not certified to the latest edition of a standard may nevertheless retain a valid certification status under the NRTL's transition process, particularly where products were manufactured and certified prior to the new edition's effective date. Accordingly, CEC staff should continue to provide manufacturers an opportunity to confirm certification status before taking action that could affect market access, customer retrofits, permitting, or utility interconnection activities. This approach is also consistent with maintaining the SEL as a reliable and transparent database of certified equipment rather than positioning the CEC as the entity making independent certification determinations.

The SEL serves an important function for tracking both current and legacy equipment deployed in California. Many products remain in service for years or decades after they are no longer actively marketed, and stakeholders such as installers, utilities, and authorities having jurisdiction (AHJs) may need access to historical information when upgrading, repairing, or expanding existing systems. Rather than automatically archiving products solely because they are not certified to the latest version of a standard, the CEC should retain products on the SEL when a valid certification remains in effect. The CEC should also clearly identify the edition of the applicable standard for which a given product was certified.



If the CEC determines that an archive list is necessary, it should be used to memorialize products whose certifications have been withdrawn, expired, or otherwise become invalid, while preserving visibility into legacy equipment and providing manufacturers with notice and an opportunity to respond before any change in listing status.

Respectfully submitted,

/s/ Marc Monbouquette

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