

DOCKETED

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Project Title:	Solar Equipment List Program Implementation
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Document Title:	RFI Request For Listing Exception - IEC 612152021 Module Submission without NOCT [GAL10R72]
Description:	N/A
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To: solarequipment@energy.ca.gov

Subject: RFI Request for Listing Exception – IEC 61215:2021 Module Submission without NOCT [GAL10R72]

Dear CEC Solar Equipment List Team,

I am writing to request guidance and a listing determination for our PV module series, **GAL10R72- followed by 580, 585, 590, 595, 600 or 605; followed by W.**, which has been certified to the latest **IEC 61215 series:2021** standard.

Our certification report does not contain a laboratory-tested Nominal Operating Cell Temperature (NOCT) value because the IEC 61215-2:2021 edition removed operating temperature test procedures entirely. Furthermore, our testing laboratories have informed us that they no longer perform standalone NOCT testing under the withdrawn IEC 61215:2005 standard.

We have reviewed the CEC's recent Request for Information (*Docket No. 26-SOLAR-01*) and strongly support staff's recognition of the challenges facing manufacturers regarding NOCT:

- **Withdrawn Standard & Testing Availability:** As noted in the RFI, IEC 61215:2005 has been formally withdrawn, and testing laboratories are increasingly unable or unwilling to conduct legacy NOCT measurements.
- **Alignment with Staff's Proposed Alternatives:** Staff's RFI identifies using fixed derate factors based on historical CEC PTC/STC data as a viable alternative for capacity estimation.

Proposed Interim Request

To avoid delaying the deployment of certified, high-efficiency solar equipment in California, we respectfully request that CEC staff grant an interim exception or administrative allowance for this submission. Specifically, we propose:

1. **Applying CEC Table 1 Derate Factors:** The CEC uses its empirical average PTC/STC ratio published in Table 1 of Docket 26-SOLAR-01 (e.g., **[Insert ratio: 0.92647 for Monocrystalline / 0.90265 for Polycrystalline / 0.92114 Overall]**) to derive the calculated PTC rating for this module.
2. **Alternative PTC Input:** Alternatively, please advise if the CEC has established an administrative field override or alternate procedure for modules tested under IEC 61215-2:2021.

Module Details:

- **Manufacturer:** SOLARIX LLC dba GOLDI AMERICA
- **Module Model Number(s):** GAL10R72-580W, GAL10R72-585W, GAL10R72-590W, GAL10R72-595W, GAL10R72-600W & GAL10R72-605W
- **Technology Type:** Monocrystalline (Bifacial)
- **Nominal STC Rating (P_{STC}):** 580 W, 585 W, 590 W, 595 W, 600 W & 605 W
- **Certification Report:** IEC 61215-2:2021 / IEC 61730:2023 & ETL Intertek ATM(Attached)

We appreciate your commitment to modernizing the Solar Equipment Lists and look forward to your guidance on how we can proceed with completing our listing application.

Sincerely,

Napoli Gomez-Laconich, CTO

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