Blue Link Solar Network

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California Energy Commission
Re: Docket No. 02-REN-1038
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5504

I would like to bring your attention to a change which would greatly increase the program's ability to reach its goal to "accelerate cost reduction and market acceptance through high volume production of emerging renewable technologies" (quote from Bill Blackburn's 3/10/2005 presentation) Thanks in part to the success of your program, the solar industry is evolving and a new type of photovoltaic system is on the market--the solar electric appliance.

The current reservation procedures assume that all PV systems are custom designed and fabricated on site from panels, inverters and racks. There are new systems that are ETL listed solar appliances with panels, inverters, disconnects, and wiring included. The CEC should change its reservation procedures to allow participants to select such systems (accredited by an independent testing firm such as ETL or UL) rather than use the old forms. This simple change will promote the goals of the Emerging Renewables Program:

1. Cost Reduction: These systems are a major step in cost reduction for solar energy. For example, the Blue Link 480 drops the cost of a PV system below $3500, after the CEC rebate. While people often discuss PV costs on a $/watt basis, it is impossible to buy one watt of PV. Solar electric appliances bring the system cost down to a level affordable to a much broader population, at competitive $/watt levels.
2. Market Acceptance: The CEC program stands to dramatically increase participation in your Emerging Renewables Program. The primary goal behind solar electric appliances is to increase the number of people using solar power by making it easy and affordable.
3. High Volume: Similarly, solar electric appliances are designed to enable high volume production/mobilization of solar power. Low cost, plug and play solar is the best way to achieve high volume--through standardization, quality control, ease of use,and affordability. CEC's help in streamlining the rebate application process will be directly in line with your goal of high volume production.
4. Your application review process will be much easier--because they are ETL or UL listed your reviewers can be confident that the system is properly designed. The inspection process will be similarly streamlined as the inspectors can be confident in that the wiring from PV panels through to the AC disconnect was done in a controlled factory environment with full quality control and quarterly inspections by ETL or UL.

5. These systems will be more reliable than custom built systems. In the high growth PV industry, the details of PV systems are often designed in the field by people with little experience in photovoltaics. Parts are substituted, connections overlooked, and "good enough" is the quality standard. These kinds of problems don't come up in a factory built system.

Currently the only example of a solar electric appliance is the Blue Link 480 from Blue Link Solar Network, LLC. Our company has two more models coming out shortly, and it is likely that solar electric appliances will be produced by others as well. This technology change is directly in line with the goals of your program, it should be embraced by your application process.

Sincerely,

Charlie Langston
Managing Director