

**Joint Comments of the California Solar Initiative Program Administrators on
Guidelines for California's Solar Electric Incentive Program's Committee Draft Guidelines
(Senate Bill 1) – Third Edition**

Eligibility Criteria and Conditions for Solar)
Energy System Incentives (Senate Bill 1))
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Docket No. 07-SB-1

Southern California Edison Company (SCE), on behalf of the California Solar Initiative (CSI) Program Administrators (PAs)¹ appreciates the efforts of the California Energy Commission's (CEC) Renewables Committee in developing the proposed minor changes to the Guidelines for California's Electric Incentive Programs (Senate Bill 1) – Second Edition. These proposed changes include:

- Change of the effective date to July 1, 2011, by when all eligible inverter-integrated meters shall be tested to plus-or-minus 5 percent accuracy by a Nationally Recognized Test Laboratory in accordance with the "Inverter Integral 5% Meter Performance Specification and Test Requirements" adopted by the California Public Utilities Commission;
- Revision of the effective date stated in the guidelines for the 2008 Building Energy Efficiency Standards to be consistent with the Commission's separate decision to revise that date to January 1, 2010;
- Clarification of photovoltaic module eligibility requirements including: requiring photovoltaic modules with different power ratings to have unique model numbers for incentive purposes, updating references to current versions of

¹ The CSI Program Administrators are SCE, Pacific Gas & Electric Company, and the California Center for Sustainable Energy.

- International Electro-technical Commission (IEC) Standards 61215 and 61646, and inclusion of optional submission of data for additional performance parameters;
- Clarification of the use of the Shade Impact Factor when accounting for shading using Monthly Solar Availability. The proposed clarifications modify the guidelines to indicate that the calculations using the Shade Impact Factor belong in the incentive calculation, not in the output data from a solar assessment tool; and
 - Modification of the Installer System Inspection alternate field verification protocol for multi-string arrays so that photovoltaic system tests and measurements may be performed simpler and potentially safer.

The CSI PAs fully support these proposed changes to the eligibility criteria, condition for incentives, and equipment rating standards for all ratepayer funded solar electric programs in California, which will improve the foundation of the CSI Program by adding more consistency, timing, clarity, and safety to the CSI Program and its participants. In addition, the CSI PAs recommend that the CEC provide an opportunity to take public comment before the workshop to be held later this year on additional issues that should be clarified and future improvements to the SB1 Guidelines. One possible improvement is modification of the inspection verification protocol to make it less costly to verify projects in the wintertime. This change is critical for the CEC to consider since it is a requirement that significantly impacts the CSI Program's administrative budget. The CSI PAs recognize that the solar industry has progressed substantially in the past few years and believe that such a change could create better efficiencies in the industry, which likely will continue to reduce costs and create a sustainable future.

The CSI PAs appreciate the opportunity to provide these comments and look forward to working with the CEC and the California Public Utilities Commission to improve the CSI Program further.

Respectfully submitted,

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