

DOCKETED

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Response to Request for Information - CEC's Solar Equipment Lists

Additional submitted attachment is included below.

March 27, 2023

California Energy Commission
Docket Unit
Re: Docket No. 18-SOLAR-01
715 P Street
Sacramento, CA 95814

Re: Docket No. 18-SOLAR-01 – Comments of Center for Sustainable Energy® regarding the California Energy Commission’s Request for Information – CEC’s Solar Equipment Lists

Center for Sustainable Energy® (CSE) appreciates the opportunity to provide comments to the California Energy Commission (Energy Commission or CEC) regarding the Energy Commission’s request for information pertaining to the use of the CEC’s Solar Equipment Lists.

CSE is a national nonprofit that is transforming markets for clean transportation and distributed energy resources (DERs) through software-enabled, data driven incentive program administration, forecasting and planning software, and unique data offerings derived from project data sets. CSE administers cutting-edge incentive programs valued at over \$4 billion for governments, utilities, and the private sector across the United States.

Accordingly, CSE provides responses to the CEC’s Request for Information regarding how the CEC’s Solar Equipment Lists are used by CSE, as follows:

1. What entity, if any, do you represent or are you affiliated with?

Center for Sustainable Energy

2. What is your/your organization’s primary use of the Solar Equipment Lists?

The CEC Solar Equipment Lists are primarily used to identify eligible equipment in incentive programs CSE administers but was also used on a demonstration project for interconnection with Pacific Gas and Electric Company (PG&E), as detailed below.

- a. **San Diego Solar Equity Program** – CSE is the Program Administrator (PA) for the San Diego Solar Equity Program (SDSEP). The CEC Solar Equipment Lists are used to verify certified eligible equipment for the SDSEP. Per Program Handbook Section 2.3.2: “The major system components, PV modules, inverters and meters must be listed on the California Energy Commission’s Solar Equipment Lists.”

Additionally, the program incentive calculation relies on the Expected Performance Based Buydown (EPBB) Calculator developed for the California Solar Initiative program, and the EPBB calculator pulls system information from the CEC Solar Equipment Lists. The EPBB calculator is used to determine the CEC-AC rating used in the incentive calculation.

- b. **Self-Generation Incentive Program** – CSE is the PA for the Self-Generation Incentive Program (SGIP) in the San Diego Gas & Electric Company (SDG&E) service territory. The CEC Solar Equipment Lists are used in SGIP to verify meters on SGIP projects 30 kW or larger. Per SGIP Handbook Section 6.10 Metering & Monitoring Requirements for Generation Projects: “All AC electric meters must be listed on the CEC’s list of Eligible System Performance and Revenue Grade Meters.”
 - c. **Santa Rosa Junior College Microgrid (EPC-17-053)** – CSE provides project management and technical support for the EPIC-funded microgrid demonstration project on the Santa Rosa Junior College (SRJC) campus. As part of the interconnection process with the PG&E grid under Rule 21, the battery equipment and inverters used in the microgrid were required to be listed on the CEC’s Solar Equipment Lists. The manufacturer selected was not certified within California and had to apply to be added to the CEC Solar Equipment Lists before the project was able to begin the interconnection process with PG&E.
 - d. **Solar On Multifamily Affordable Housing (SOMAH)** – CSE is part of the SOMAH PA team for SOMAH and uses the CEC Solar Equipment Lists to verify certified eligible equipment for the SOMAH Program. The SOMAH Program Handbook also references the CEC Solar Equipment Lists. Per Handbook Section 2.3.1, Equipment Certifications, New Equipment, Not Pilot or Demonstration Systems: “System component ratings must also be certified by the California Energy Commission (CEC) and placed on the CEC’s Eligible Equipment List. Components must also meet all requirements for interconnection with the electric utility, including Rule 21 requirements.”
3. **How often do you download or reference the Solar Equipment Lists from the Solar Equipment Lists website at <https://solarequipment.energy.ca.gov/Home/Index?>** a. Less than 1 time per month b. 1 to 3 times per month c. More than 3 times per month d. Other - please explain:
- a. **SDSEP** – Other – the applicants are required to submit EPBB calculator printouts, and for equipment to be included on the EPBB site, it is already synced up with the CEC Solar Equipment Lists

- b. **SGIP** – C – More than 3 times per month
- c. **SRJC** – A – Less than 1 time per month
- d. **SOMAH** – Other – PowerClerk (application portal) is tied to the list for eligibility and equipment verification.

4. Please provide information on how the Solar Equipment Lists assist you/your organization with everyday business needs: i. How do they integrate with your operations? ii. How would you describe the value of the lists to your efforts? iii. If applicable, approximately how many interconnection applications/permits to operate do you process, on a monthly basis, using the data on the Solar Equipment Lists?

Without a regularly updated equipment list, the programs CSE administers would not have a relevant and appropriate resource to ensure that properly certified equipment is eligible for participating in the program.

5. Roughly how much time do you save on a weekly or monthly basis by using the data on the Solar Equipment Lists, as opposed to not having the lists as a reference?

CSE does not have an exact estimate of how much time our organization saves by using the data on the CEC Solar Equipment Lists, but as noted in Item 4 above, the availability of the CEC Solar Equipment Lists helps alleviate the burden on programs to do their own research and vetting of equipment.

6. Is there a format that would improve the effectiveness of the lists or ability to use them?

CSE has no suggestions at this time for any formatting changes that would impact effectiveness or usability.

7. Can you substitute the data from the Solar Equipment Lists with another data source? How would your program(s) be impacted without this resource?

CSE is not aware of any other applicable resource. If this resource was eliminated, the programs for which CSE uses this resource would have to create their own guidelines around what equipment is permitted.

8. As an equipment manufacturer (if applicable), what are the benefits of having your equipment listed on the Solar Equipment Lists?

Not Applicable.

Center for Sustainable Energy

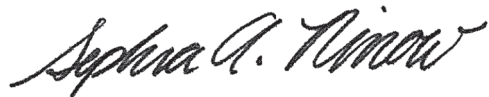
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9. Please share any other feedback you would like us to consider.

None at this time.

Sincerely,

A handwritten signature in black ink that reads "Sephra A. Ninow". The signature is written in a cursive, flowing style.

Sephra A. Ninow, J.D.

Director, Regulatory Affairs

Center for Sustainable Energy®

3980 Sherman Street, Suite 170

San Diego, CA 92110

Tel: (858) 244-1177

sephra.ninow@energycenter.org