

DOCKETED

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*Comment Received From: CSI Solar
Submitted On: 4/5/2023
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CSI Solar Comments

Please find our comments attached.

Additional submitted attachment is included below.

Date: April 5th, 2023

Document type: Comments

Object: Docket 18-SOLAR-01

To whom this may concern,

Please find below CSI Solar's feedback regarding the Solar Equipment Lists

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

Answer: We are a PV module manufacturer and solar solutions provider.

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

Answer: Listing of our products for usage within the state of California

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?>

Answer: c. More than 3 times per month

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?

Answer: It is useful to our customers that need the product to be part of the list to be able to get approvals from the utilities.

II. How would you describe the value of the lists to your efforts?

Answer: It is a comprehensive source of information for stakeholders approving usage of our products. It allows us to sell our products within the state of California and beyond (certain states or utilities also use this list as source of information).

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?

Answer: We do not process any of those applications or permits ourselves, our clients do. If we base it on volume sold, it is conservatively >1000 applications per month.

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?

Answer: Hard to estimate not knowing the alternative. If we'd have to list or qualify our products with every utility instead, the amount of work would certainly be multiplied.

6. Is there a format that would improve the effectiveness of the lists or ability to use them?
Answer: Grid Support Solar/Battery Inverters that are listed under a system listing should also be listed as separate Grid Support Solar Inverters (customers can't find the inverter when applying for interconnection).
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?
Answer: At the current moment we can't. The utilities pull the eligible products from this list. Therefore, an amended process with the utilities would be needed prior to a substitution of the list.
8. As an equipment manufacturer (if applicable), what are the benefits of having your equipment listed on the Solar Equipment Lists?
Answer: Being able to be listed within the utilities list of approved products and therefore be able to sell within the state of California and beyond.
9. Please share any other feedback you would like us to consider.
Answer:
 - Addressing the applicability of JA12 certificates (currently no info).
 - Update the list on a weekly basis (more frequently).
 - Voicemail call back is not consistent.

Sincerely,

Product Management