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Solar Equipment Lists Program Implementation RFI_UL

see attachment

Additional submitted attachment is included below.

DOCKETED

Docket Number: 18-SOLAR-01

Project Title: Solar Equipment Lists Program Implementation

TN #: 249146

Document Title: Request for Information – CEC's Solar Equipment Lists

Description: Written comments due by April 14, 2023, at 5 p.m. PST.

Filer: Sandra Espinosa

Organization: California Energy Commission

Submitter Role: Commission Staff

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Request for Information

California Energy Commission's Solar Equipment Lists

Docket 18-SOLAR-01

Written Comments Due: April 14, 2023, at 5:00 p.m. PST

The California Energy Commission (CEC) seeks input and comments on how the CEC's Solar Equipment Lists are used by participants. The information will help the CEC determine whether to make any modifications. To facilitate information gathering and to better identify use cases, staff developed the questions below and seeks feedback from stakeholders by April 14, 2023.

Background

The CEC developed the Solar Equipment Lists under Senate Bill 1 (Murray, Chapter 132, Statutes of 2006) to establish criteria and standards for solar incentive programs under the California Solar Initiative, such as the New Solar Home Partnership Program (NSHP). The lists include photovoltaic modules, inverters, meters, and related solar energy equipment that meets national safety and performance standards. The lists are available online at https://solarequipment.energy.ca.gov/Home/Index.

These lists provide information and data that facilitates research, modeling, and utility grid connection services for consumers and state and local programs. Given the widespread use of the data, the CEC seeks input about how stakeholders utilize the Solar Equipment Lists and the type of value they provide.

Request for Information

Feedback is requested on the questions below. Stakeholders are not required to respond to every question in this request for information (RFI) but are encouraged to respond specifically to those questions closest in line with their knowledge and experience.

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

   Underwriters Laboratories (UL Solutions, UL)

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

   Secondary reference data on products to supplement data such as certifiers' websites and product manuals.

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?

   c. More than 3 times per month

3. 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?

Secondary reference data on products to supplement data such as certifiers' websites and product manuals.

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

It is valuable as secondary reference data in a readily searchable database of product model numbers, however it can be misused in the industry because it is not linked in real time to certifiers' and manufacturers' data, therefore may not be up to date.

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?

None

4. 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?

0-2 hours; – it is only used to supplement certifiers' website / manufacturer data.

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

Yes: links to certifiers' website showing product certifications status and certifier verified ratings; links to manufacturers' installation manuals.

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

The primary "source of truth" can only be the certifiers' websites for product certifications status and certain ratings as well as the manufacturer's installation manuals. Without the equipment list, a secondary reference set of data would not be available but this would not have a significant impact on operations.

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

n/a

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

As noted, certification status and ratings can change, which may not be reflected in a third party database. Additionally, a lot of key rating information is missing (fire type, load ratings, and others), so while the list is helpful as a secondary reference, it may introduce safety or regulatory problems if relied upon as a primary source of validation data.