

DOCKETED

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Request for information - CEC solar equipment list - Tesla

Additional submitted attachment is included below.

Request for Information – CEC’s Solar Equipment Lists

4/14/2023

1. What entity, if any, do you represent or are you affiliated with?
 - i. Tesla Inc.
2. What is your/your organization’s primary use of the Solar Equipment Lists?
 - i. Tesla: we use the list as both an equipment manufacturer who adds and maintains listings on the various equipment lists as well as an installer/coordinator who uses the list for automated permitting and power interconnection agreements processing
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
 - More than 3 times per month.
 - The list is in virtually constant use for one of the applications noted above
 - d) d. Other - please explain:
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?
 - Because of how many utilities and AHJs, both in California and nationally, rely on the CEC equipment list as the authority for determining if equipment is eligible for interconnection and the relevant specifications of that equipment, the CEC list has become indispensable. The CEC equipment lists are inextricably linked to both many Utilities online interconnection systems/forms as well as existing automated permitting systems such as SolarApp. Without these systems automatically pulling in information from the CEC these systems currently do not function and there is no functional workaround for not having CEC listed equipment, in the case Utilities online interconnection systems/forms, or it is much a more onerous process, in the case of automated permitting systems such as SolarApp.
 - While we recognize and appreciate the value of having a single authority that is used broadly, like the CEC equipment lists, the actual process of getting equipment listed or for updating an existing listing on the CEC list is, currently, a material impediment to Tesla’s operations. The listing process can significantly delay time to market for new products or features as you can only start the CEC listing process once all relevant documentation is available, and the product is essentially ready to deploy. From that point, the CEC listing process can take anywhere roughly 30-45 days from time of submittal. In most cases, the relevant information provided to the CEC is already available on the Nationally Recognized Testing Laboratories (NRTL) website but:
 - Must be re-submitted again to the CEC,

- Be re-reviewed by the CEC for re-listing the same information in a different format in a new location, and
 - During the listing process there is, currently, no transparency about how big the queue of requests under review is, where in the process the application is, and no single point of contact for any questions on the application.
 - If there were a single improvement that we could request from the CEC it would be to address the above item. Visibility into the process, even if the timeline for listing itself can't be reduced, would greatly improve Tesla's ability to plan, as a business, around the CEC listing process.
- ii. How would you describe the value of the lists to your efforts?
- Pros
 - Acts as a single source of truth for uniform utility and permit submission when AHJs use platforms like SolarApp+ and PowerClerk which makes application approval more efficient and more automatable in those areas.
 - The CEC list, by virtue of its widespread adoption as this authority, avoids the administrative challenges that would exist if each jurisdiction had to maintain its own list and establish their own bespoke processes and methodologies for listing equipment and characterizing the equipment's relevant technical attributes.
 - Cons
 - In its execution/implementation there is room for improvement, particularly to reduce some of the existing redundancies around listing verification
 - Should take listing at face value and pull the necessary information from the NRTL website¹
 - Delays time to market for new products
- 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?
- >8000 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?
- i. This is challenging to answer as it really depends on the counterfactual. As noted above, we recognize the value of having a single source of truth used by many utilities as this avoids the patchwork of bespoke requirements we might otherwise have to contend with.
6. Is there a format that would improve the effectiveness of the lists or ability to use them?

¹ We note that the inverter efficiency and PV module performance testing would have to be entered by an applicant separately as this information is not currently part of the NRTL listing.

- i. Once items appear on the CEC list the format and structure of the current list seems to work well enough. It is the process of achieving listing that could, in our view, benefit from some efficiency improvements and additional transparency.
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?
 - i. It would be possible to substitute information from the NRTL websites that already exists and is already required as a part of code compliance. Unfortunately, different NRTL's currently have different formats for displaying the same information both between NRTLs and vs. how the CEC displays most of this information. The CEC list does provide value by centralizing and standardizing how this information is formatted, but the information presented to and by the CEC lists is almost entirely accessible from other sources such as the NRTL websites. This leads us to the perspective that there are meaningful opportunities to improve the efficiency of the listing process by leveraging the information provided by the NRTLs.
 - ii. Q: How would your program(s) be impacted without this resource?
 - We would need a process to replace this system if it didn't exist. Many submittal applications use this list. It would be difficult to overstate how many utilities and AHJs in California and nationally rely on the CEC equipment list. If it did not exist these utilities would need to identify and codify an alternative which would lead to considerable delay and disruption.
8. As an equipment manufacturer (if applicable), what are the benefits of having your equipment listed on the Solar Equipment Lists?
 - i. As noted, we recognize and appreciate the benefits of a single source of truth that many utilities and AHJs rely on, as having such an authority avoids the patchwork of bespoke approaches that would likely vary from one jurisdiction to the next. Because of the scope of utilities and AHJs that rely on the CEC list for various purposes, if the CEC equipment lists were to disappear tomorrow or become nonfunctional that would cause significant problems for deploying and installing equipment.
9. Please share any other feedback you would like us to consider.
 - i. The CEC should work to improve the efficiency and user friendliness of the equipment lists. From the perspective of a manufacturer, we recommend the following:
 - The CEC should endeavor to reduce the time required for listing, specifically by working with NRTL's to automatically pull in information as it appears in their systems.
 - Provide additional transparency into the listing process so that entities seeking to have equipment listed have visibility into the size of the queue for revising applications and can see where in the process their application sits.