

## DOCKETED

<b>Docket Number:</b>	07-SB-01
<b>Project Title:</b>	Eligibility Criteria and Conditions for Solar Energy System Incentives (SB1)
<b>TN #:</b>	214201
<b>Document Title:</b>	Jon Previtali Comments: The Importance of Solar Module Durability Testing
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Jon Previtali
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	10/26/2016 4:16:38 PM
<b>Docketed Date:</b>	10/26/2016

*Comment Received From: Jon Previtali*

*Submitted On: 10/26/2016*

*Docket Number: 07-SB-01*

## **The Importance of Solar Module Durability Testing**

Speaking on behalf of myself and not the Wells Fargo organization that does not officially take a position on this issue, I contend it's important that the CEC require that PV solar modules pass IEC 61215, equivalent or better durability tests on a periodic basis to safeguard the long-term performance of solar modules in the state. I organize durability testing of solar modules on behalf of Wells Fargo's renewable energy project finance team and see anomalies a good portion of the time. We use test results to reject module shipments, make warranty claims, and customize maintenance procedures to watch out for manifestations of faults predicted by durability tests. I feel that if we didn't perform these tests, a material portion of our projects would receive modules that would not perform as expected. I believe consumers in CA would face a similar risk if durability testing were not required for modules on the CEC list. It's important to note that Wells Fargo does durability testing so we don't have to rely solely on warranties from module manufacturers. Fulfilling warranty claims after module installation have proven to be cumbersome and there are many cases of module lifetimes exceeding that of their manufacturer's. Although the durability tests are not infallible, they are useful to help validate modules' ability to meet performance expectations over project economic lifetimes which are often 20 or 25 years.