

DOCKETED

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Topic 3: Recommendations to Improve the PV Module Listing Application Form

Pls see attached

Additional submitted attachment is included below.

Recommendations to improve the PV module CEC Listing

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RETC, LLC (Fremont, CA)

1. Acceptance of UL 61730 as an alternate for UL 1703
2. CEC requires that the range of the models to be entered is in descending order of power rating but this is not intuitive. It will be good to insert a note to prompt the user

Model Number (Descending Order)	Nameplate Rated Pmax (Watts)
Model X380	380
Model X375	375
Model X370	370
Model X365	365

3. The P/F for Pmax tested value vs nameplate rating is 5% but the form turns red if it is above 10% instead of 5%. This has to be fixed.

Table 2: Tested vs. Nameplate Values Comparison for Laboratory Tested Model

Group/Subgroup 1	Laboratory Tested Model (LTM) Number	Pmax
Tested Value		365
Nameplate Rating		400
Tested vs. Nameplate		-8.75%
Notes:		
Subgroup 2 of Group 1	Laboratory Tested Model (LTM) Number	Pmax
Tested Value		359
Nameplate Rating		400
Tested vs. Nameplate		-10.25%

4. CEC requires same sample to be tested for NOCT and Temperature Coefficients. To save on cost, manufacturers submit Black Backsheet samples for NOCT to cover both Black and White NOCT as this is worst case condition however since temperature coefficients has to be measured on both black and white, the condition "test on same sample" cannot be satisfied. We suggest to remove this requirement.

5. Clause 3.1 requires that the column "Description" is limited to 30 characters but this is not enough to cover : backsheet color, power rating, technology, # cells, special description.

Example: "385W Black Backsheet 60 PERC Monocrystalline Half-cells PV Module" (over 30 characters)

6. CEC rejects applications if the Power Rating is not in the Description column. The form does not prompt the user that this is required especially there are specific columns pertaining to power so if this is required, the user must be prompted that this is a minimum requirement. We suggest to either put a drop down menu or add a note under the column name.

Model Number	Description
Only list eligible PV modules determined in Table 2.	(Power, BS Color Cell Type)
Model X380	
Model X375	

7. Remove the term "in addition to lab accuracy" in clause 2.5 which seems to suggest that lab accuracy can be added to the ±5% range as the intent was that the lab uncertainty is factored into the value reported to the Energy Commission, and is not used to adjust the reported value

2.5 Tested vs. Nameplate Pmax = (Tested Pmax - Nameplate Rated Pmax)/Nameplate Rated Pmax x 100%. Generally, the acceptable value is between -5% and +5% in addition to lab accuracy. If not, the group/subgroup is not eligible and a module retest may be required.

8. Cut-off dates- if this is no longer applicable this has to be removed or clarified:

- The deadline for submitting listing requests to the Energy Commission is the last day of each month; all documentation must be submitted in on email request before this date to be reviewed during the following month.

9. CEC Requirement for submissions from Manufacturer:

All equipment listing requests and required documentation must be submitted by the Equipment Manufacturer. (The NRTL may provide assistance.)

There are too many rejections from the manufacturer submissions because they are not as focused on CEC's detailed guidelines so it is beneficial for them to work with external test labs who are focused on standards and regulations.

It will be good if Test Laboratories be allowed to submit on behalf of manufacturers, and just require adding the main contact person from the manufacturer in the cc list or any

confirmation possible to make the process more efficient instead of requiring only the manufacturers to submit.

10. Different Topic: **OSEGT** (including AC Modules)

The form states only the NRTL is authorized to do testing. We think the intent is Certificate is issued by the NRTL as opposed to tested. Most NRTLs have satellite labs and CBTLs that are not NRTL which they authorize to test for them. The certificate is issued by NRTLs therefore is still the NRTL's responsibility. Pls consider revising the words to allow CBTLs under NRTLs to test instead of limiting this to NRTLs.

Manufacturer Name: [REDACTED]	
New <input type="checkbox"/> Existing <input type="checkbox"/>	
Request Type: [REDACTED]	
Contact Name: [REDACTED]	
Address: [REDACTED]	
Phone Number: [REDACTED]	
Email Address: [REDACTED]	
Model Number(s): Submit one form for each group:	
[REDACTED]	
OSEGT Application form ¹	
<ul style="list-style-type: none"> Is the form complete and accurate? 	Yes <input type="checkbox"/> No <input type="checkbox"/>
Nationally Recognized Testing Laboratory (NRTL) ²	
<ul style="list-style-type: none"> Is the testing laboratory a Nationally Recognized Testing Laboratory (NRTL) whose Scope of Recognition under the Occupational Safety and Health Administration (OSHA) includes UL 1741? 	Yes <input type="checkbox"/> No <input type="checkbox"/>
<ul style="list-style-type: none"> Does the application include a UL 1703 or 1741 safety certification from a NRTL? 	Yes <input type="checkbox"/> No <input type="checkbox"/>
Notes	
[REDACTED]	