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*Comment Received From: Roger Salas*  
*Submitted On: 11/2/2018*  
*Docket Number: 07-SB-01*

**SCE Comments On Docket# 07-SB-01**

Comments in attached document

*Additional submitted attachment is included below.*

SCE appreciates the opportunity to comment on CEC's Draft Guidelines for California's Solar Electric Incentive Programs. SCE understands that these are complex issues that industry is facing and SCE looks forward to continue to work with CEC and stakeholders in addressing these and future issues.

1. SCE applauds the CEC for expanding its list to include equipment not limited to PV. The DER market has evolved and SCE has seen a large increase in energy storage device interconnection which will be supported by the inclusion of other equipment as outlined draft guideline.
2. It is unclear from Chapter III, Section C and Appendix B, Section B what level or type of certifications are the minimum requirements for listing of equipment. For example, Appendix B, Section B indicates that a Smart Inverter "shall additionally provide applicable documentation as follows" that includes CSIP certification. SCE comments that industry does not hold this to be a requirement at the inverter level but an option that can be used if inverter manufacturer meet this certification at the inverter level. SCE recommends making language clear as to what are the minimum requirements for listing vs what are additional certification that will accepted and listed as additional inverter capability.

## **B. Inverters**

All inverters shall have certification conducted by an NRTL<sup>78</sup> to UL 1741. Smart inverters, as defined in Chapter III, Section C, shall additionally provide applicable documentation as follows:

- Certification for UL 1741 SA from a NRTL, and associated test report or test summary.
- Certification for CSIP from SunSpec Alliance.
- Certification for IEEE 1547:2018 (or later) and associated conformance test procedures from a NRTL.

3. SCE encourages the CEC to expand its draft guidelines and its equipment list to include any device or system that are needed to support efficiency of integrating DER resources into the grid. SCE recognizes that what CEC has done so far has allowed SCE to interconnect large number of DERs in an efficient manner. However, as the DER system become more complex and new devices or systems are required, centralized equipment listings should also be update to incorporate what would be require for new complex systems. Not incorporating devices and systems to the CEC list will required that multiple listings be created which will lead to inefficiencies, confusion and reduction of efficiency in the interconnection process. . These devices and systems include inverter control units, energy management systems, and Rule 21 aggregator systems.
4. SCE comments that the proposed language on page 13 and page B-1 (below) is adequate for temporary implementation of SunSpec Common Smart Inverter Profile (CSIP) Conformance Test Procedures. However, SCE cautions that having one entity (SunSpec) as providing certification to the inverter industry for interconnection requirements can lead problems and delays in what is currently very efficient interconnection process (specially for small DERs). Thus SCE suggest that the language as proposed be used temporarily while other means certification are developed with industry in order to allow multiple entities or NRTLs to provide CSIP certification equivalent to SunSpec. SCE proposes that work be continue in this space as to allow certification of CSIP to be equivalent as to how certification is currently done with NRTLs when the NRTL has been listed OSHA as being recognized to perform certain certification (such as UL 1741).

**i. Chapter III- Section C - Inverters**

- Product certification from SunSpec Alliance to *Common Smart Inverter Profile (CSIP)* requirements, defined in IEEE 2030.5:2018, in accordance with the *SunSpec Common Smart Inverter Profile (CSIP) Conformance Test Procedures*.

**Appendix B – Section B**

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