

DOCKETED

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Updates to Approved Equipment List

Additional submitted attachment is included below.



November 2, 2018

TO: California Energy Commission
Renewable Energy Technology Unit
Renewable Energy Division

RE: Docket 07-SB-01; Eligibility Criteria and Conditions for Solar Energy System
Incentives (SB1)

The California Solar & Storage Association (CALSSA) submits the following comments in response to “Draft Guidelines for California's Solar Electric Incentive Programs (Senate Bill 1), 7th Edition,” published October 18, 2018. CALSSA greatly appreciates the work of the California Energy Commission (CEC) in ensuring safety standards are maintained for distributed energy resources and help to create documentation pathways that enable the market to operate smoothly. CALSSA offers two recommendations for fixing problems with the draft guidelines.

First, the draft guidelines list three smart inverter standards: UL 1741 SA, IEEE 2030.5, and IEEE 1547:2018. The way these standards are listed could create confusion and should be clarified. The draft guidelines state, “Currently the certifications for advanced functionalities include:” and list all three standards equally. CALSSA recommends not including the three standards in one bulleted list because the requirements for each are different. UL 1741 SA should be required of all inverters. IEEE 2030.5 is not required at the inverter level, but site-level compliance is one of three compliance pathways. Therefore, certification to IEEE 2030.5 may be submitted but is not required. IEEE 1547:2018 certification can be submitted at any time but will not be required unless the CPUC sets a deadline for inclusion of that standard. The treatment of each of these three standards should be described in separate paragraphs.

More generally, the draft guidelines use the term “smart inverter” without defining it clearly. The document states, “As of January 1, 2020, the Energy Commission will discontinue accepting requests to list inverters that do not incorporate smart inverter functionality.” (p. 13) This will likely create unnecessary anxiety among inverter manufacturers if they do not know exactly what functionality will be required. CALSSA recommends clarifying that inverters must “incorporate smart inverter functionality as required by California Rule 21 according the implementation schedule therein.”

Second, the document correctly states that certification to UL 1973 is necessary for all “batteries” but certification to UL 9540 is at the level of “battery systems.” UL 1973 applies to battery cells, and listing of models that are certified to UL 1973 will be straightforward. Listing battery systems will be less straightforward because the UL 9540 certification may exist in different components or in the system as a whole. This item needs more attention from a stakeholder group before it is implemented.

Thank you for the opportunity to provide these comments. We look forward to working with you to update the Approved Equipment Lists.

Sincerely,

Brad Heavner
Policy Director