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Inverter requirements

On page 13 we have the following

As of January 1, 2020, the Energy Commission will consider changes to discontinue accepting requests to list inverters that do not incorporate smart inverter functionality.

Currently the certifications for advanced functionalities include:

• Product certification to UL 1741, inclusive of Supplement SA (UL 1741 SA), with optional

sections, from a NRTL. The NRTL test report or summary of test results for Supplement SA testing must also be provided.

• 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.

• Product certification to IEEE 1547:2018 (or later version) and associated conformance test procedures from a NRTL.

Comment 1: Product certification of an inverter to SunSpec Alliance to Common Smart Inverter Profile (CSIP) should not be a requirement, it should be optional for inverters with this built in capability. Nothing in Rule 21 stated this as a requirement for an inverter. Secondly the certification will not come from SunSpec but from a SunSpec approved lab.

Comment 2: IEEE 1547:2018 certification via testing to IEEE 1547.1 will not be available in January 2020. The document will most likely be released towards the end of Q1 2020 or early Q2 2020. am no the IEEE P1547.1 working group.

Comment 3: The same concerns as Comment 2 and 2 above apply to Appendix B, part B Inverters on page B-8