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on Solar Equipment Lists Program Implementation

Additional submitted attachment is included below.

1. What entity, if any, do you represent or are you affiliated with?

Powertree Services Inc.

2. What is your/your organization's primary use of the Solar Equipment Lists?

Manufacturer Listing of our products and our suppliers' integrated products

3. How often do you download or reference the Solar Equipment Lists from the Solar Equipment Lists website at <https://solarequipment.energy.ca.gov/Home/Index?>

- a. Less than 1 time per month
- b. One to 3 times per month
- c. More than 3 times per month **XX**
- d. Other - please explain:

4. Please provide information on how the Solar Equipment Lists assist you/your organization with everyday business needs:

i. How do they integrate with your operations?

Helps make sure we can sell our products in California and other States and provides comfort to financiers and partners about equipment and company.

ii. How would you describe the value of the lists to your efforts?

Necessary to get building permits and financing in California and other States and to qualifying for other States that reference California for acceptable equipment.

iii. If applicable, approximately how many interconnection applications/permits to operate do you process, on a monthly basis, using the data on the Solar Equipment Lists?

Not directly applicable as usually done by Installers/customers.

5. Roughly how much time do you save on a weekly or monthly basis by using the data on the Solar Equipment Lists, as opposed to not having the lists as a reference?

Not applicable

6. Is there a format that would improve the effectiveness of the lists or ability to use them?

Yes. Several Improvements needed:

a) Currently, no allowance is made for DC-Coupled PV to Battery configurations in current listing forms. Seem to assume only AC coupled or integrated inverter-batteries. Critical to

support DC Coupled configurations by allowing Flag as DC Coupled and indicating supported modules.

b) No allowance is currently made for component systems comprising UL1741 listed Inverters and UL1973 Batteries. Not all battery systems can be listed as UL9540 especially larger systems and those requiring variability in battery size by project. Battery modules UL1973 listed should be able to be listed.

c) Need to enable reference for DC Charge Controller and Load Controllers as part of DC coupled systems.

7. Can you substitute the data from the Solar Equipment Lists with another data source? How would your program(s) be impacted without this resource?

Not applicable

As an equipment manufacturer (if applicable), what are the benefits of having your equipment listed on the Solar Equipment Lists?

Makes sure we can sell our products in California and other States which use California's equipment lists for qualifications for use and rebates.

8. Please share any other feedback you would like us to consider.

The baseline of the lists is for equipment used in Single Family residential type applications and is currently exclusionary to Multi-Family Residential and Multi-tenant Commercial applications. Consideration of these segments is critical so as to avoid creating unforeseen barriers in critical market segments.