



Solar Energy Solutions Group

DOCKET	
06-NSHP-1	
DATE	<u>NOV 07 2006</u>
RECD.	<u>NOV 07 2006</u>

**STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION**

Guidebook of California) Docket No. 06-NSHP-1
New Solar Homes Partnership)

**COMMENTS OF SHARP SOLAR ON THE
DRAFT NEW SOLAR HOME PARTNERSHIP GUIDEBOOK**

On behalf of Sharp Electronics Corporation, Solar Energy Solutions Group ("Sharp Solar") I would like to offer some comments and concerns about the rules that will govern the New Solar Homes Partnership Program ("NSHP").

Sharp Solar is the world's leading manufacturer of solar PV components, and is the market leader in the California solar market; over one third of PV systems installed in the CEC's Emerging Renewables Program in 2006 used Sharp PV modules.

Let me outline our specific concerns below:

1. Module certification requirements. Sharp Solar is a signatory to a letter that will be filed separately, outlining recommendations by a group of major solar PV manufacturers on module certification protocol for the New Solar Home Partnership. Sharp Solar endorses those recommendations.
2. Warranty Conditions. Sharp Solar has several concerns related to the draft provisions outlined on page 10 of the Draft Handbook. These include:
 - a. Degradation of electrical output. The draft states that a condition of the warranty should include a provision that the electrical output of the components will not degrade by more than 15 percent from their originally rated output. We would recommend that this provision should be revised to refer to 15% degradation from the minimum rated output.
 - b. We are concerned about the lack of clarity on system and component performance verification protocols for determination of warranty compliance. We recommend that a workshop be convened to develop consistent protocols for field verification of system performance warranty requirements for installed systems. We are not aware of any system-level field verification protocols available today to validate changes in system performance.



Solar Energy Solutions Group

3. PV Calculator. The program will be relying heavily on an as-yet-unreleased PV Calculator for determining EPBI incentive levels, and verifying system performance during random audits of installed systems. We understand the need for moving quickly, but want to be sure that we and other solar companies have an opportunity as early as possible to become familiar and comfortable with accuracy of the PV Calculator prior to its being used as a field verification tool.
4. Multi-string arrays and inverters. There are many instances in new solar home construction where two or more sub-arrays are mounted on different roof faces on a single roof. In a case where such systems use a multi-string inverter such as Sharp's, the estimated EPBI Design Factor and PV Calculator performance verification can and should be calculated for each string separately.

Thank you for the opportunity to provide recommendations for the New Solar Homes Partnership.

Sincerely yours,

A handwritten signature in black ink that reads "Ch O'Brien".

Christopher O'Brien
VP, Strategy & Government Relations
Sharp Solar
202-486-3427
obrienc@sharpsec.com