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**BP Solar Comments
October 13, 2006**

**New Homes Solar Partnership
Docket No. 06-NSHP-1**

BP Solar supports the objectives of the New Homes Solar Partnership. Effective implementation of the program will lead to substantial energy, environmental and economic benefits to the State of California and its citizens. We appreciate the leadership of the California Energy Commission (CEC) in developing an effective program that will deliver these benefits and welcome the opportunity to participate in this process.

General Comments

The solar electric power market is still in its early development and program implementation should reflect important themes of simplicity for homeowners, builders and developers; consistency with other elements of the California Solar Initiative as it relates to the residential retrofit, commercial and public buildings market segments; and ease of and efficiency in administration.

We continue to be concerned that the current direction for development of program details will result in an overly complex program for all stakeholders, which could threaten the success of the program and impede new homes market development.

Detailed Comments (all refer to New Solar Homes Partnership draft guidebook dated September 2006)

Pg. 4 Section II, Item B. in order to comment on this section, we need more clarity around the administrative difference between Tier I and Tier II. For example, is there a different level of subsidy involved?

Pg. 6 Section II, Item G. In order to evaluate the proposal fully we need to have visibility to the PV Calculator, especially how shading and orientation are evaluated outside of the "California flexible installation" criteria, and how the TDV (time dependent valuation) is done.

Pg. 8, Section II, Item J. We would like to clarify that components outside of the scope of the program requirements, such as in-home energy system monitors or energy storage systems, are excluded from the requirements of this warranty section. These should be considered system accessories with applicable industry standard warranties. Further, we support the language involving 10 year

warranty and 15% degradation; however a 5% minimum tolerance on this must be given as it is generally acknowledged that measurement accuracy in controlled conditions (global test labs) is not better than 6%.

Pg 9, Section III, Item A. We believe that a \$2.50/watt initial rebate is too low given that the baseline system is at an optimum orientation with no shading. Therefore the actual amount of rebate will almost always be below the \$2.50/watt rebate. Therefore the initial rebate should be adjusted upward to allow a smooth transition from the present program. For this reason, we recommend an initial rebate level of \$2.80/watt in the California NSHP.

Pg 28 Appendix 3, A. Performance: We strongly support the use of performance evaluation standards but feel the IEC61215 mechanical evaluations (section 10.16) are redundant with UL1703 and add unnecessary time and cost to the certification process. This relatively small market segment would also be the only one in the US that would require a unique certification level above and beyond US industry practice. Further, the IEC61215 mechanical standards were developed for rack mounted modules and are not appropriate for BIPV roof mounted modules. UL acknowledges this and has used alternative mechanical standards for roofing components instead of the mechanical testing requirements of UL1703. The application of IEC61215 mechanical requirements will result in significant limitation in innovation and development of BIPV products in the California NSHP and therefore limit the success of this program. Testing of PV products to the non-mechanical IEC61215 standards will likely require 12 months to complete. Therefore we request a 1 year period before decertifying existing products.

Pg 29. We strongly urge that the CEC not attempt to adjust module rating schemes used by various manufacturers in this program. Modules are sold around the world at a nominal power rating +/- an appropriate tolerance. Because these are indoor tests, they do not include LID. A change to industry module rating systems in the California NSHP would require the production of special products for the unique rating system and would result in a reduction in available product for the program and harm the program. For example, BP Solar modules carry a +/-5% tolerance and the average power is close to nominal rating. If BP Solar was forced to derate a 175watt module 5% to 166 watts, we would be underrating our modules very significantly. Furthermore, the actual performance of the PV system will be both clearly stated and verified by third party auditors therefore eliminating any risk of misrepresentation or customer dissatisfaction -all without rewriting global module rating schemes.

If however the CEC wants to change existing industry module rating practice, we further recommend that the nameplate module rating should be based on actual module average power as tested. Through the in-place data collection processes that support existing auditing requirements manufacturers can demonstrate that they are averaging within a suitable range of nominal value.

Appendix 4 C .While we agree that installers must be expected to stand behind their work and support the 3rd party field verification and diagnostic testing requirements, we see no added value in requiring that these procedures be performed twice for each system. This would create an unnecessary added cost burden for the builder who wants to deploy PV. In section 3 it is unclear as to whether the HERS rater must complete field verification on all or merely a random sample of systems.

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