

Subject: [External] Seth Davis with Accutek Systems Inc- Response to ABP System Design Criteria Feedback Request.



Seth Davis [REDACTED]

to IPA.Solar

Fri, May 21, 1:29 PM (5 days ago)

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Hi

Regarding item A.

I don't think a set efficiency limit would be easy to determine. From a standpoint of consumer protection I feel like a cost per watt, or payback time would be more effective. We have seen cases where partly shaded, and/or less than ideal azimuth, or tilt could be made up for with a few extra panels while still providing a good value to the customer.

Regarding item B

The capacity factor limitation would also have the same problems mentioned above. One thing that I have run into before when submitting applications is that the PV watts capacity factor is based on the system DC nominal size. Since the ABP uses a capacity factor based on system AC size the PV watts capacity factor numbers can be misleading.

Regarding item C

I do think there should be a limit on azimuth. I would allow some leeway beyond 90 or 270 though. Some east and west roofs might be a suitable location for an array, but the building might be skewed little making the array azimuths 280 and 100, instead of 270 and 90 for example. I suggest no less than 75, or more than 285 degrees.

Regarding item D

I do think there should be a maximum payback period. I suggest no more than 20 years.

Regarding item E

I think that there could be a range for the values mentioned in all the above items that could be considered sub optimal, but allowable. If a project falls into this range there could be a warning on the disclosure form to bring it to the attention of the customer. I think this applies equally to all versions of the disclosure form.

Regarding item F

I think all of these factors apply equally well to all financing methods.

Seth Davis

Accutek systems Inc