

Subject: [External] Eric Conklin - Response to ABP System Design Criteria Feedback Request



Eric [REDACTED]

to IPA.Solar, [REDACTED]

Fri, May 21, 4:33 PM (5 days ago)

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A. System Efficiency as Compared to an Ideal System

1. Should an ABP system be compared to a system with an ideal azimuth and tilt for that system's location and be limited to a certain percentage of the production of an ideal system? No.
2. Rather than prohibiting participation, could a disclosure requirement scoring that system based on its percentage of optimal efficiency achieve the same goals? Yes. A scoring system in the disclosure form that alerts the customers where their efficiency would be in comparison is the better approach.

B. Capacity Factor

1. Should there be a minimum capacity factor for projects submitted? No
2. Should an absolute range be drawn for each tracking type (fixed tilt, 1-axis tracking, 2-axis tracking)? If so, what range?
3. Alternatively, should capacity factors that deviate from the imputed PVWatts capacity factor by more than a certain percentage be disallowed? If so, what percentage?

C. Azimuth 1. Should there be a required azimuth range for ABP systems? No.

D. Payback Period for Purchased Systems

1. Should there be a maximum payback period for ABP systems? Yes. If so, how many years/months would constitute an unacceptable payback period? Beyond 15 years should be unacceptable.
2. Should an internal rate of return ("IRR") be allowed as a substitute for simple payback, and if so, what minimum IRR should be set? If an IRR is used, 15% should be minimum.

E. Distributed Generation Disclosure Form

1. Which, if any, of the criteria should be disclosed to customers through the Distributed Generation Disclosure Form if this/these condition(s) are understood by the Program to be sub-optimal? **Any criteria which are sub-optimal or are below an acceptable norm should be disclosed (brought to the attention) to customers making a System Purchase.**

2. For a System Purchase, it should be stated and confirmed that the DG installer will provide an inventory list containing models and serial numbers of all equipment when delivered on the installation date(s). This is used for the customer to visually compare and verify the equipment being delivered and installed versus what was promised in the contract and project plan.

In addition for a System Purchase, adding a section to list equipment models and approximate replacement costs for use with Homeowners Insurance. As an example, What are the approximate replacement costs per solar panel after a hailstorm?

F. Financing Structure

1. Should any of the requirements contemplated herein vary based on financing structure (ownership vs. leases vs. PPAs)? No.

Why might leases or PPAs be handled differently in protecting consumer interests? N/A

Eric Conklin

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

"Keep your face always toward the sunshine--and shadows will fall behind you." --Walt Whitman