

TWG comments

Comments from	Shadow group member	Comment #	Extent of the comment	Chapter No. / Section No.							Chapter title	Page #	Selected information subject to the comment	Major/Minor comment	Comment description	Proposal for modification	Rationale / supporting data
giorgia.concas	AIE - EU Electrical Contractors Association	1	Entire Chapter								Policy option 2: Ecodesign requirements on modules and inverters	94		Major	Ecodesign for PV modules and inverters could help installers avoid using the worst products. However, the emphasis should not be on efficiency and electricity yield, but on the environmental impact for production. Otherwise ecodesign might favour e.g. products that achieve high output but use more hazardous material and hamper the development of new solutions that are more environmentally friendly. It is suggested that all inverters should support data monitoring. This is good. The data should have a standard format to allow - if the customer gives permission - easy third parties access. In option 2.4 it is suggested that inverter manufacturers provide preventive maintenance and replacement cycle and declare the technical lifetime. This is good.		
giorgia.concas	AIE - EU Electrical Contractors Association	2	Selected Text								Policy option 3: Energy labelling requirements for residential PV systems	106	Energy label policy option 3.1: Efficiency-based EEI	Major	It makes no sense to create a "package" of PV modules and inverters because there is no relation between both (any inverter works with any PV module). (This was corroborated by a representative from Fronius in one of the last meetings.) As with Ecodesign, the main focus should be on the environmental impact for production, not efficiency. The existing energy label lay-out is meant for energy consuming products and not very suitable for renewable energy products: even the lowest category has an environmental benefit and therefore should have the colour green rather than red.		
giorgia.concas		3	Selected Text								Policy option 3: Energy labelling requirements for residential PV systems	107	Residential system energy label option 3.2: Yield and performance ratio based approach	Major	As most residential systems are designed using a software tool made available by the inverter manufacturer, a policy measure targeting the quality of this software tools would be preferable. Introducing a generic transitional method to calculate the yield and performance ratio that might contradict the manufacturers' software could lead to situations where a suboptimal system receives a better label. Yield and performance ratio are not necessarily the main design parameters. Instead, the installation can e.g. be designed to maximise self-consumption by using east-west orientation. It requires a considerable effort in market surveillance to verify that the labels – which would have to be awarded by the installer of the system – are correct.		

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giorgia.concas	AIE - EU Electrical Contractors Association	4	Selected Text								Policy option 4: EU Ecolabel criteria set	112	Residential package with services	Major	<p>We do not understand why only residential systems are covered.</p> <p>1. Package approach:</p> <p>As mentioned above, the package approach does not make sense. Separate labels for PV modules and inverters, taking into account the environmental impact, are welcome.</p> <p>2. Service approach:</p> <p>As mentioned above, the system design factors should be covered by the software tools of the inverter manufacturers. It will require a considerable effort in market surveillance to verify that the labels are correct.</p>		
giorgia.concas	AIE - EU Electrical Contractors Association	5	Selected Text								Policy option 5: Green Public Procurement (GPP) criteria	115	5.1: Improved PV system life cycle performance	Major	Focus on environmental impact is good.		
giorgia.concas	AIE - EU Electrical Contractors Association	6	Selected Text								Policy option 5: Green Public Procurement (GPP) criteria	118	5.2: Facilitating increased residential system installations	Major	<p>The main focus should be on the environmental impact.</p> <p>Possible drawbacks of reverse auctions:</p> <p>Reverse auctions typically favour larger companies over smaller, local companies. We recommend that the location of the company is part of the selection criteria.</p> <p>The public authority that organises the tender will have to put a lot of effort in quality control of the installed systems to check conformity with the tender. It may not be equipped to do so, unless a quality scheme is set up (e.g. the UK Microgeneration Certification Scheme (MCS)) and only companies adhering to this scheme are entitled to participate in reverse auctions.</p> <p>When experience is a selection criterion, existing companies are favoured over start-ups.</p>		