

 Print comments

Rep. of	Reviewer	Shadow group member	Nr.	Relevance	Page(s)	Chapter/Section	Scope
Industry	Concas, Giorgia	AIE - EU Electrical Contractors Association	1	Major	94	Policy option 2: Ecodesign requirements on modules and inverters	Entire Chapter
	Comment:	<p>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.</p> <p>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.</p>					
	Rationale:						
	Suggested Actions:						
Industry	Concas, Giorgia	AIE - EU Electrical Contractors Association	2	Major	106	Policy option 3: Energy labelling requirements for residential PV systems	Selected Text
	Selected Text:	Energy label policy option 3.1: Efficiency-based EEI					
	Comment:	<ul style="list-style-type: none"> • 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. 					
	Rationale:						
	Suggested Actions:						
Industry	Concas, Giorgia		3	Major	107	Policy option 3: Energy labelling requirements for residential PV systems	Selected Text
	Selected Text:	Residential system energy label option 3.2: Yield and performance ratio based approach					
	Comment:	<ul style="list-style-type: none"> • 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 					