

10/31/2023
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

RE: Docket No: 23-R312-01 Investigation into Possible Amendment of Utah Admin. Code R746-312, Electrical Interconnection

To whom it may concern,

Smart Wave Solar is a residential solar installer in Utah. We have over 100 employees and have served thousands of Utahns by installing solar panels on their homes.

Smart Wave currently has an inventory of 312 SMA Sunny Boy Inverters (roughly \$450,000 in value) that will be made obsolete by this code change. So, while we don't oppose this code change, we would ask that we have the opportunity to sell these units (on residential solar agreements), and subsequently install all of those projects without having this code change leaving us with a large amount of unusable inventory.

The reason we have so many of these units is because of the turbulent nature of the supply chain for solar-related products over the last few years. SMA is switching to a new inverter that will meet the requirements of this code change, but they have experienced multiple delays with that product launch. Their new inverter still isn't available to the market. We really like SMA inverters, so we've purchased a large quantity of them to ensure we don't have a disruption in our ability to keep offering them to our customers.

We will likely be able to allocate all of these inverters on residential solar agreements by March 31, 2024. As long as we would be allowed to get these inverters approved on utility applications through that date (and then still be allowed to install them thereafter), this code change wouldn't be a problem for us.

If the code change takes effect before we can work through this inventory, it would cause some very significant problems for our company and the Utah residents we serve.

Sincerely,



Ryan Stucki
CEO/Partner
Smart Wave Solar
ryan@smartwavesolar.com