CONSULTATION RESPONSE FORM

Consultation on MIS 3002 and MGD 005

Thank you for taking the time to comment on this consultation. MCS values the input from all interested parties in the development of its Standards as, without you, we would not be able to define and raise the quality of installations. We would be grateful if you could use this form for your response which helps with collation and consideration of responses. The form is in two parts: the first part includes a table where you can make comments on each line/paragraph of the draft document; the second part includes specific questions that will help arrive at a final published version.

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| Introduction:  We are consulting on changes to our installation standard for solar PV systems (MIS3002). Since 2012 this document has relied upon the Guide to the installation of PV system published by MCS and ECA. However, the IET have since published their Code of Practice for the installation of Solar Photovoltaic Systems which is more up to date. This new draft of MIS3002 adopts the IET Code but fills in gaps and re-enforces certain requirements. It also incorporates the energy performance method from the old guide but separates the shade assessment into a new guidance document MGD005. This shade assessment method has been known to have practical issues and so is now optional such that MCS Certified contractors can use other shade assessment methods provided they are no less valid.  We are also interested in suggestions for other simplified shade assessment methods which could be adopted instead of that within MGD005. Any such methods should not be reliant on proprietary software packages as it would not be appropriate for MCS to adopt or endorse software from any one particular vendor. |

| Respondent Name: | Company Name: |  |  | Date | Document |
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|  |  |  |  |  | MIS 3002 & MGD 005 |

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| Line Number | Paragraph/Table | Comments | Proposed new text |
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Note: You may add as many additional rows as required to table above.

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| Additional Comments: |

**Consultation Questions**

In addition to comment on the content of draft document(s) detailed above, we have these specific but more general questions:

QUESTION 1: Do you agree with the suggestion of making the shade assessment procedure A method of assessing shade as opposed to THE only acceptable method?

* 1. Yes
  2. No (please explain your reasons in the box below)

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QUESTION 2: In several parts of the draft document we detail requirements that are also documented elsewhere as legal requirements (e.g. maintaining ingress protection rating is a requirement of BS7671). We have done this in places because these issues have been identified as common failures. The failure to maintain the IP rating of DC isolators was identified as one cause of solar PV fires in a report published by the BRE. However, some would contend that duplication of requirements across standards is not good practice. Do you agree or disagree with highlighting such issues in an MCS standard to reinforce them even when it is duplication?

1. Agree
2. Disagree (please explain your reasons in the box below)

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QUESTION 3: The scope states that the Standard only applies for solar PV systems supplying permanent buildings and connected to the distribution network. The original intention of this many years ago was to make it clear that this Standard should not apply to small solar PV system supplying isolated equipment such as telecommunication equipment etc. However, is the inclusion of these qualifying words necessary in the scope? If MIS 3002 could/should cover off-grid buildings, should the scope be worded differently?

1. Keep as it is
2. Suggest changing the scope as detailed in the box below

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QUESTION 4: The BRE report on Solar PV fires made the recommendation that MIS 3002 should contain requirements around module layout for access for maintenance and/or emergency services, but no suggestions were given. Should MIS 3002 contain prescriptive requirements in this respect?

1. No, the text as far as it goes in 5.5.2 is fine
2. Yes, we would recommend more prescriptive requirements as suggested below.

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QUESTION 5: The Introduction of MGD005 states that it may be appropriate to avoid sites with severe shading. Would it be appropriate to define what Shade Factor would be considered severe such that an installation would be inappropriate? For example, anything with a shade factor ≤0.5?

1. No we do not agree
2. Yes we think “severe” should be defined as suggested below.

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QUESTION 6: Currently near shade items are defined as those ≤10m from the bottom of the array but this is argued as too far. Would a smaller distance (say 5m or 3m) be more appropriate? Or perhaps define the distance as a function of the height of the object? We’re interested in ideas for how the near shade calculation could be improved/defined.

1. We think it is fine as it is
2. We’d suggest changing as below.

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