



Julie Robertson  
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Dear Julie,

Washington Solar Energy Industries Association, (WASEIA) respectfully offers some brief comments on the Department of Ecology's draft legislative proposal to delay the implementation of Washington State's Photovoltaic (PV) Module Stewardship and Takeback Program law, Chapter 70A.510 Revised Code of Washington.

In Section 1(5)(a)(i) of the draft legislation (page 4), we suggest an additional change to the original bill language:

Current: (i) A stewardship plan must, at a minimum: (i) Describe how manufacturers will finance the takeback and recycling system, and include an adequate funding mechanism to finance the costs of collection, management, and recycling of photovoltaic modules and residuals sold in or into the state by the manufacturer with a mechanism that ensures that photovoltaic modules can be delivered to takeback locations without cost to the last owner or holder;

Suggested change: (i) A stewardship plan must, at a minimum: (i) Describe how manufacturers will finance the takeback and recycling system, and include an adequate funding mechanism to finance the costs of collection, management, and recycling of photovoltaic modules and residuals sold in or into the state by the manufacturer. ~~with a mechanism that ensures that photovoltaic modules can be delivered to takeback locations without cost to the last owner or holder;~~

The draft language assumes that the manufacturer funded product stewardship model continues as we move forward, but we have seen through conversations with stakeholders, other sources of revenue may be needed.

In Section 2(1)(j)-(k) of the draft legislation (page 8), we suggest two changes to the criteria for membership in the photovoltaic module advisory committee that would be established by the legislation.

Current: (j) A photovoltaic module installer;

Suggested change: (j) A residential and commercial photovoltaic module installer involved in the installation of photovoltaic modules on the customer's side of the meter;

Current: (k) A photovoltaic module project developer;

Suggested change: (k) A utility scale photovoltaic module project developer;

These clarifications would ensure that members of both groups would be part of the advisory committee. Utility scale developers should be engaged in this process, as well as those installers working in the built environment on the customer's side of the meter.

Thank you,

Bill Will  
Senior Policy Analyst  
Washington Solar Energy Industries Association

Cc: James Paribello, WASEIA  
WASEIA Board