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Subject: Submission Received
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The below submission has been lodged and confirmed on the AEMC Web site.

Submission Type: Rule Change

Reference: Technical standards for distributed energy resources

Organisation: Enphase Energy

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Comments: We support the implementation of AS4777.2:2020 as soon as practically possible, with the latest date as suggested being September 2021. We believe a 6 month implementation date is acceptable and should be to all manufactures, this is the case with UL in the USA. 12 months as suggested by others such as the CEC, is unambitious and does not address the rapidly expanding DER market in Australia. We also propose that all manufactures should provide official test reports for short duration under-voltage ride through as soon as practically possible, this is critical to grid stability across the country.

We would also suggest that the product listing are not carried out by the CEC due to the time it takes for them to approve products, as well as the extortionate unnecessary price tag they insist upon. Another organization or each DNSP should provide this list. This has been the cases with the OTR in South Australia.

We also support other key features of your proposal such as the DER Technical Standards applying to new connection and replacement inverters and connection alterations. This will help ensure that the future of DER is stable and controllable.

If you have any further follow up, please do not hesitate to contact me.

Kind regards,

Ryan Turner (MEng. Hons)
Enphase - Lead Filed Applications Engineer

URL: <https://www.aemc.gov.au/admin/structure/contact/messages/7101>