

Mr Andrew Swanson
Project Leader
Australian Energy Markets Commission

Submitted online: aemc@aemc.gov.au

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Dear Mr Swanson,

Consumer Energy Resources (CER) technical standards.

The Australian Energy Council (AEC) welcomes the opportunity to respond to the Australian Energy Markets Commission (AEMC) consultation paper review into Consumer Energy Resources (CER) technical standards.

The Australian Energy Council (AEC) is the peak industry body for electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. Our members collectively generate the overwhelming majority of electricity in Australia, sell gas and electricity to millions of homes and businesses, and are major investors in renewable energy generation. The AEC supports reaching net-zero by 2050 as well as a 55 percent emissions reduction target by 2035 and is part of the Australian Climate Roundtable promoting climate ambition.

The setting of required technical standards at installation should not be the responsibility of the customer, who should reasonably expect that their purchase is manufactured and installed in line with all required standards. Responsibility for compliant installation should belong to the CER installer and the requirement to obtain and keep compliance records with the distribution network. Distribution networks need records that enable them to track and discover non-compliant installations.

The AEMC has limited jurisdiction over CER installers, but the AEMC can recommend that a compliance framework is developed jurisdictionally that establishes the process, and the corresponding compliance and enforcement actions. The AEMC may also make recommendations from its review to the technical regulators in each jurisdiction that may apply.

As a minimum these review recommendations should include:

- Accreditation requirements to install CER.
- Recording the setting the appropriate technical standards at the time of installation, such as via mandatory electrical contractor compliance requirements for electrical installation works in each jurisdiction (such as certificates of electrical safety).
- A requirement that distribution networks report any identified non-compliance with the setting of technical standards to the relevant regulator.
- Relevant regulators having powers to enforce accreditation and installation compliance.

Please contact the undersigned at David.Markham@energycouncil.com.au should you wish to discuss.

Yours sincerely,

David Markham
Australian Energy Council