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Jemena Electricity
Networks (Vic) Ltd
ABN 82 064 651 083

Andrew Swanson
Senior Adviser
Australian Energy Market Commission
GPO Box 2603
Sydney, NSW, 2001

Level 16, 567 Collins Street
Melbourne, VIC 3000
PO Box 16182
Melbourne, VIC 3000
T +61 3 9173 7000
F +61 3 9173 7516
www.jemena.com.au

Lodged via the AEMC's [website](#)

Dear Andrew,

AEMC's review of consumer energy resources (CER) technical standards

Jemena Electricity Networks (**JEN**) welcomes the opportunity to respond to the Australian Energy Market Commission's (**AEMC**) review of consumer energy resources (**CER**) technical standards. JEN supports the AEMC's continued engagement on matters relating to CER, including the role that distribution network service providers (**DNSPs**) play in securely managing customers' export services.

The AEMC's consultation paper seeks stakeholder feedback on issues associated with implementing CER technical standards, including existing inverter standards (AS 4777.2). Key consultation issues include the extent of non-compliance with the National Electricity Rules (**NER**) and which market participants should be responsible for rectifying any non-compliance with NER.¹

Overall, we consider it is more efficient to address compliance requirements with inverter standards early in the supply process, rather than leaving the end of the supply chain (i.e. installers and DNSPs) to address these inverter setting issues. We consider original equipment manufacturers should be required to release devices with pre-configured settings that comply with the latest relevant Australian Standards. This would avoid confusion from installers about how to configure devices in accordance with updated standards² and ensure DNSPs do not connect non-compliant CER devices to their networks.

If you have any questions regarding this letter, please contact me on 03 9173 7000 or matthew.serpell@jemena.com.au.

Kind regards,

A handwritten signature in black ink that reads "Matthew Serpell".

Matthew Serpell
Manager Electricity Regulation
Jemena Electricity Networks

¹ AEMC, *Review of CER technical standards*, 29 September 2022, p. 3.

² AEMC, *Review of CER technical standards*, 29 September 2022, p. 16.