



**EnergyAustralia**

LIGHT THE WAY

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Submitted electronically: <https://www.aemc.gov.au/contact-us/lodge-submission>

Dear Commissioners

### Review into Consumer Energy Resources Technical Standards

EnergyAustralia is one of Australia's largest energy companies with around 2.4 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory, of which around 22k customers are supported under our hardship program (EnergyAssist). EnergyAustralia owns, contracts, and operates a diversified energy generation portfolio that includes coal, gas, battery storage, demand response, solar, and wind assets. Combined, these assets comprise 4,500MW of generation capacity.

EnergyAustralia appreciates the opportunity to participate in the AEMC's review into Consumer Energy Resources (CER) technical standards. We support the view of the AEMC that compliance with the setting of required technical standards at installation is a crucial issue to rectify, and change is required to ensure the risk to customer, market wide, and distribution specific, benefits is mitigated.

The onus on compliance for setting the appropriate technical standards should not be on the customer. They have contracted for the supply of a CER system, and the expectation should be that it is manufactured and installed in line with all required standards. Therefore, we believe that the responsibility for compliance should sit between the CER installer (ensuring they installation is compliant) and the distribution network (for confirming the installation is compliant). Distribution networks need a regulatory framework that enables recourse against non-compliance by CER installers.

We appreciate that the AEMC has limited capacity to impose a compliance framework through regulatory change upon CER installers; however, we believe to rectify the instances of non-compliance with technical standard requirements, that the AEMC must work with the relevant government and state-based regulator (e.g. state energy regulators or the Clean Energy Regulator) to ensure a framework is developed that establishes the process, and the corresponding compliance and enforcement actions.

EnergyAustralia believes non-compliance can be significantly reduced if the following process is established:

1. Require all CER installers to have an accreditation through the relevant regulator, without this they should be unable to install CER.
2. Require CER installers to provide proof to a distribution network that they have set the appropriate technical standards at the time of installation. This substantiation should be provided at the same time as other mandatory artefacts (Certificate of Electrical Safety).
3. NER amended to require distribution networks to report any non-compliance with the setting of technical standards to the relevant regulator.
4. Relevant regulator empowered to enforce compliance, with the capacity to revoke a CER installers accreditation; where the regulator has undertaken reasonable endeavours to provide the CER installer the capacity to rectify any significant or systemic instances of non-compliance.

If you would like to discuss this submission, please contact me on 03 9060 1361 or [Travis.Worsteling@energyaustralia.com.au](mailto:Travis.Worsteling@energyaustralia.com.au).

Regards

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