

25 May 2023

Andrew Swanson
Australian Energy Market Commission

Submitted online

Dear Mr Swanson

RE Review into consumer energy resources technical standards

TasNetworks appreciates the opportunity to respond to the Australian Energy Market Commission's request for submissions to its draft report on the Review into Consumer Energy Resources (**CER**) technical standards.

TasNetworks is the Transmission Network Service Provider, Distribution Network Service Provider (**DNSP**) and Jurisdictional Planner in Tasmania and is committed to ensuring Tasmanian customers can maximise the benefit of their investment in CER.

TasNetworks has contributed to and supports Energy Networks Australia's (**ENA's**) submission and provides the following comments from a Tasmanian perspective.

Non-compliance with standards is not causing immediate issues in Tasmania. However, it is recognised that it is a latent issue, that if not solved will cause issues in the future, by which time finding remedies may well be expensive or impractical. Therefore, TasNetworks supports moves to assist manufacturers, installers and customers in meeting the technical standards.

The final recommendations should ensure costs to customers are kept to a minimum by avoiding duplication and only implementing those actions required to increase compliance to an acceptable level. While each of the recommendations individually will help with compliance, there is a degree of overlap between them. For example, if the 'obligation' to make manufacturers ensure devices are compliant with AS/NZS 4777.2:2020 (draft recommendation 1: Remove historical device settings) is taken up, then the need for commissioning sheets and installer training will be unnecessary.

TasNetworks is aware of discussions around the implementation of Common Smart Inverter Profile (**CSIP-AUS**) which would see the option of allowing DNSPs to remotely configure device settings. If this change to CSIP-AUS was made then other actions to improve compliance would be made redundant. Given this change may occur before the impact of non-compliance in

Tasmania reaches a level with material impacts on the network, TasNetworks would recommend an opt-in approach be part of the implementation of any changes. This would allow a delay in incurring costs of implementing reforms that become unnecessary, or if the changes did not eventuate in a timely manner, implementing the reforms when the forecast benefits outweigh the implementation costs.

There are also concerns about the introduction of funded training for installers (draft recommendation 6: Funded training on CER technical standards for installers). While TasNetworks operates an Enterprise Registered Training Organisation (**ERTO**), the scope of the current training is limited to supplying training to our team members and contractors to enable work on and in the vicinity of our network and infrastructure. Our trainers would require upskilling to obtain the technical skills required to deliver training in the installation and commissioning of CER devices. There would need to be a mechanism to allow recovery of the cost of this upskilling along with the delivery of the training. As stated above, with the impact of non-compliance not causing immediate issues in Tasmania, it is questionable whether customers will be willing to pay extra for this in the near term.

TasNetworks is committed to ensuring customers can maximise the value of their CER. However, this must not occur by imposing undue costs for the broader customer base, which may occur if an approach that is suitable for regions facing challenges from CER penetration, but unnecessary for the Tasmanian network, is taken.

For more information or to discuss this submission, please contact TasNetworks' Technical Regulation Specialist, Tim Astley, at tim.astley@tasnetworks.com.au.

Yours sincerely

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Chantal Hopwood
Head of Regulation