



Anna Collyer
Chair, Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000

Submitted via email

9 June 2023

Dear Ms Collyer

Additional Submission of CEC: Review into CER Technical Standards (EMO0045)

In addition to the Clean Energy Council's (CEC) previous submission, the CEC would like to provide a supplementary submission proposing an outline for what a National Consumer Energy Resources Technical Standards body would look like and be responsible for.

Thank you for the opportunity to respond, we would be very happy to discuss these issues in further detail with AEMC and to facilitate engagement with CEC members as part of the Review.

If you would like to discuss any of the issues raised in this submission, please contact Con Hristodoulidis on christodoulidis@cleanenergycouncil.org.au or Emily Perrin on eperrin@cleanenergycouncil.org.au.

We look forward to contributing further to this important area.

Yours Sincerely

A handwritten signature in black ink that reads 'CHristodoulidis'.

Con Hristodoulidis
Direct Distributed Energy
Clean Energy Council

A handwritten signature in black ink that reads 'EPerrin'.

Emily Perrin
Policy Officer Distributed Energy
Clean Energy Council

National Consumer Energy Resource Technical Standards Body

Why a national body for CER technical standards is needed

Given the importance of compliance and a nationally consistent approach to Consumer Energy Resources (CER) technical standards, plus the likely increasing need for cybersecurity compliance, a new body to oversee CER technical standards will be best and least cost approach to assign roles and responsibilities and co-ordinate compliance across the industry.

Current organisations, such as DNSP, Clean Energy Regulator, State Electrical Safety Regulators, the AER or the Clean Energy Council accreditation processes, capture various aspects of technical standards or compliance but there is no central co-ordinating body to provide governance and co-ordination oversight across these various market bodies. While DNSP do have recourse through the connection agreement to manage non-compliant connections, they are focused on arrangements within their own service areas only and may not be seen as being sufficiently independent or the most appropriate to coordinate a national response.

Proposed responsibilities of a National CER Technical Standards body

The National CER Technical Standards Body would have a coordinating and facilitation role, rather than a compliance role:

- Strategic oversight
 - Oversee the development of technical standards for CER through support and guidance. This would include working closely with already existing bodies, such as Standard Australia's Smart Energy Advisory Board, to support the development and maintenance of a CER technical standards roadmap.
 - Maintain watching brief on relevant standards internationally, liaising with Standards Australia.
 - Review and track the implementation and performance of CER technical standards.
- Test, certification and standardisation
 - Develop an appropriate model for testing and certification capabilities to service the Australian market and oversee the development and maintenance of it.
 - Ensure such a model administers appropriate testing and certification for relevant standards, including: AS4755, AS4777, the Australian implementation of IEEE 2030.5 (CSIP-AUS), and relevant future standards like Electric Vehicles.
 - Although having an Australian test lab would be beneficial to ensure industry standards are adhered to, the burden of costs and intermittently requiring extensive workforce to operate a testing facility on Australian shores would be too great.
 - Instead, the current requirement that the CEC applies should continue, namely, test labs that perform the testing and certification are required to have ISO Accreditation.¹ However, it should be accompanied by further oversight by the National CER Technical Standards body. Specifically, this body can be given

¹ For Certificates, the Certifier should be accredited to ISO/IEC 17065 with the required Standard in Scope. For test labs, the test lab should be accredited to ISO/IEC 17025 with the required Standards in Scope.

legislative powers to hold test labs to account, whereby they are removed from the Australian market or suspended until audited, if it is found that the test lab has been testing or interpreting standards incorrectly.

- Ensure nationally consistent application and interpretation of standards and key technical approaches (e.g., flexible exports/imports, minimum demand management) through the development of a model and overseeing the implementation and management of it.
- Adjudicate and clarify standards disputes.
- Standard revisions would progress through routine Standards Australia process, with handbooks as more responsive guides to technical requirements.
- Ensure nationally consistent application and interpretation of standards and key technical approaches (e.g., flexible exports/imports, minimum demand management)
- Facilitate national testing days to support interoperability.

Interactions

Working with industry, State Electrical Safety Regulator and Standards Australia to develop and interpret standards relevant to DER/CER.

Establishment

Establishment of a new National CER Technical Standards Body would be complex and take time (years) given that it would require federal endorsement and endorsement by each jurisdiction (perhaps via the National Energy Transition Partnership) to ensure that state electrical safety regulators and national bodies could be coordinated and funded appropriately.

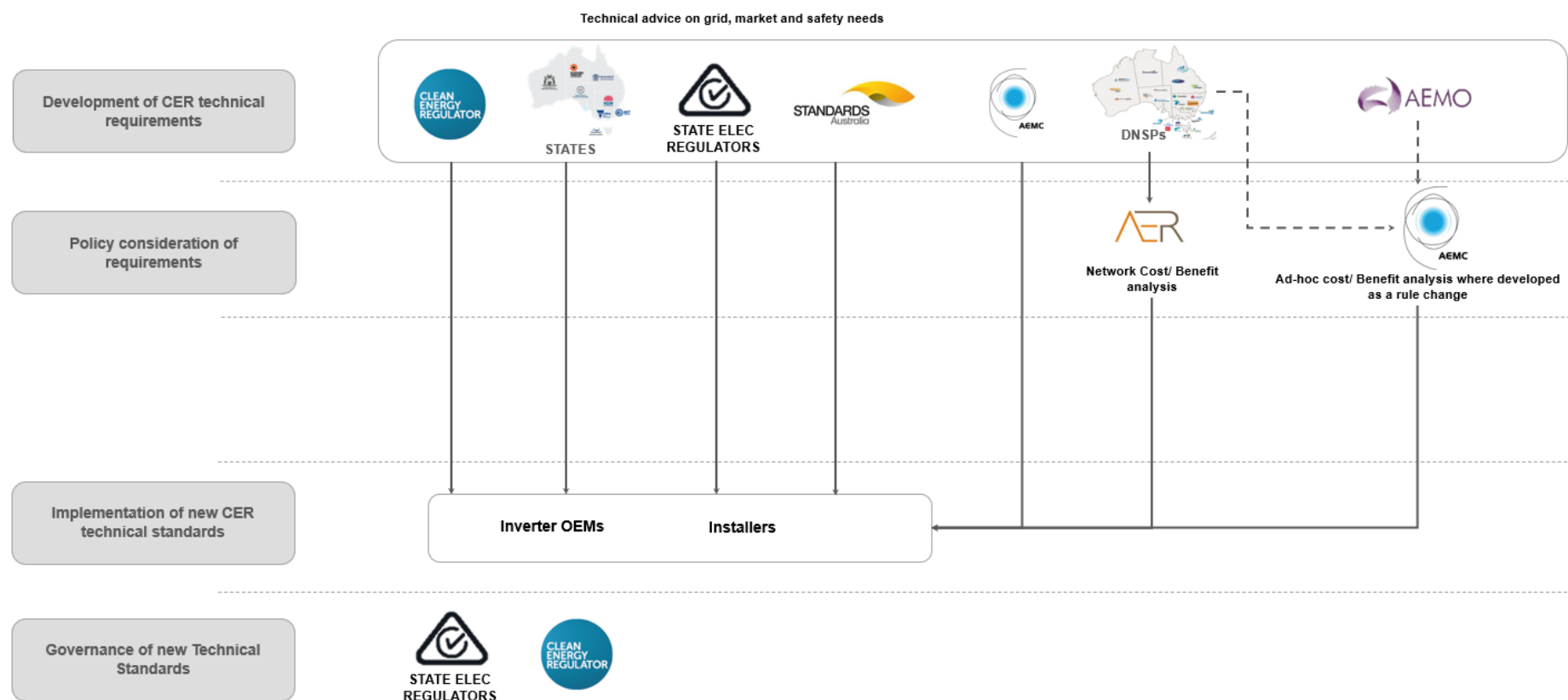
Discussions with the Australian Energy Market Commission (AEMC) indicate that enabling legislation would likely be needed (commonwealth and state).

Interim approach (while STCs remain)

A proposed interim approach would see the CER hold compliance data, which would be provided by the DNSP. The DNSP would require the installer to provide evidence that the installation has met the compliance obligations of the DNSP prior to connection being completed and this evidence would be provided to the CER to support issue of STCs.

While the CEC set up an Australian Standards interpretation enquiry channel, allowing for a formal process to discuss standards interpretation.

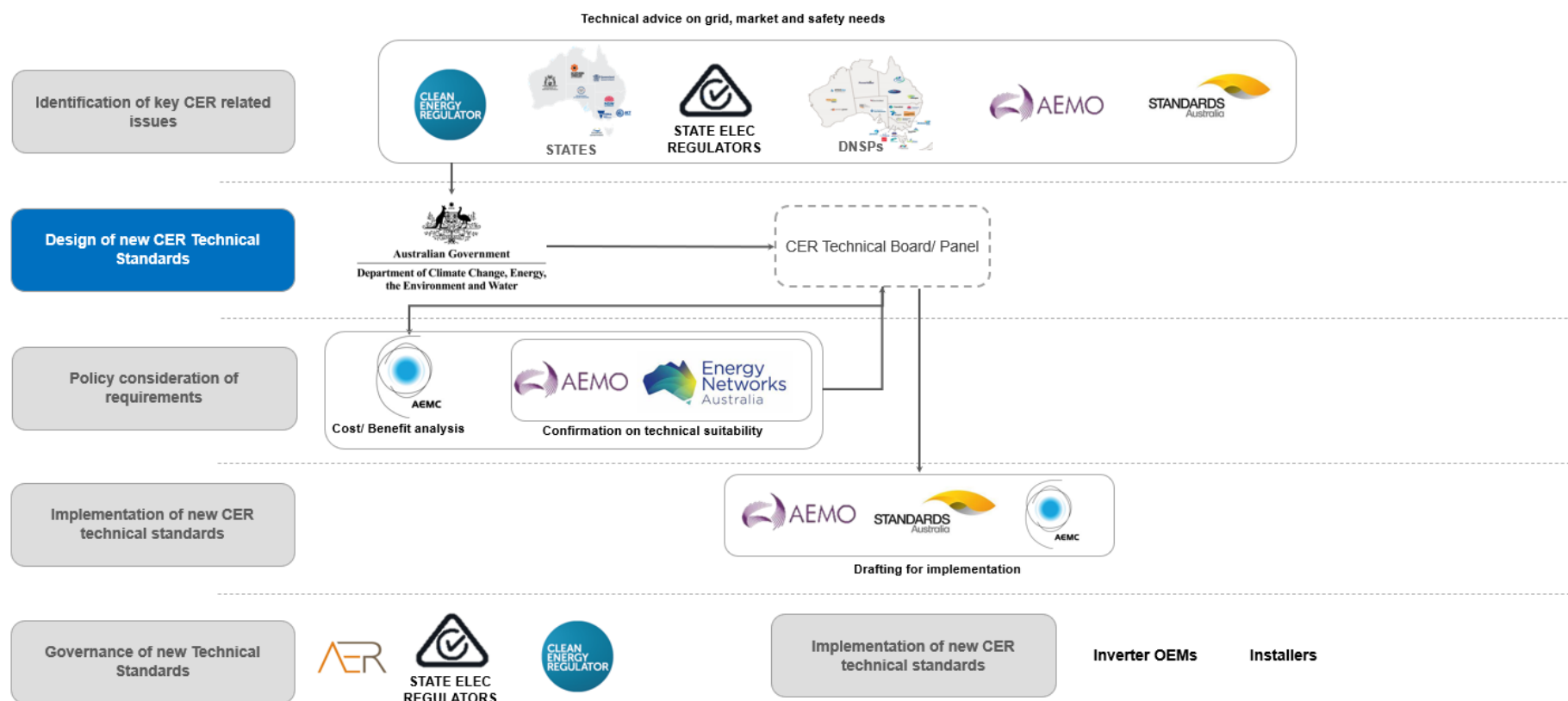
Current approach to introduction of CER standards:



² See [joint submission](#) to AEMC Review into Consumer Energy Resources Technical Standards Draft Report by SolarEdge Technologies (Australia) PTY LTD (SolarEdge), Enphase Energy Australia (Enphase), Tesla Motors Australia Pty Ltd (Tesla), sonnen Australia Pty Ltd (sonnen), Redback Technologies (Redback), SMA Australia Pty Ltd (SMA), and Fronius Australia Pty Ltd (Fronius).

New CER Governance: Option 1 – DCCEEW ownership of CER under Electrification umbrella:

 New body



³ See [joint submission](#) to AEMC Review into Consumer Energy Resources Technical Standards Draft Report by SolarEdge Technologies (Australia) PTY LTD (SolarEdge), Enphase Energy Australia (Enphase), Tesla Motors Australia Pty Ltd (Tesla), sonnen Australia Pty Ltd (sonnen), Redback Technologies (Redback), SMA Australia Pty Ltd (SMA), and Fronius Australia Pty Ltd (Fronius).