



11th April 2024

Anna Collyer
Chair
Australian Energy Market Commission
Level 15, 60 Castlereagh St
Sydney 2000
E: aemc@aemc.gov.au

**Consultation Feedback for the Draft Determination on the National Electricity Amendment
(Unlocking CER benefits through flexible trading) Rule**

Dear Ms Collyer,

Thank you for the opportunity to provide feedback to the Australian Energy Market Commission (AEMC) Draft Determination on the National Electricity Amendment (Unlocking CER benefits through flexible trading) Rule. As a leading global specialist in photovoltaic system technology, SMA is setting the standards today for the decentralized, digital and renewable energy supply of tomorrow. With headquarters in Germany and more than 3,800 SMA employees in 20 countries SMA has been devoted to this task for 45 years, also having invented the first string inverter.

Our product range spans the home rooftop sector, commercial and industrial applications and large utility-scale applications in the multi-megawatt range. We supply grid-connected inverters as well as inverters for independent, stand-alone systems. Our product range also includes storage solutions for battery systems of all sizes. Our PV solar inverter and battery storage products and complemented by components for energy management, system monitoring, and data analysis. SMA has a global inverter capacity of 140 GW in more than 190 countries and more than 9GW inverter capacity in the Australian market from smaller residential systems to large utility scale solar farms. We have over 110 employees across Australia with headquarters based in Sydney.

SMA supports the proposed changes which would create new arrangements for:

- Large customers to choose multiple energy service providers,
- 'Flexible' consumer energy resources (CER) to be identified and managed separately from 'passive' consumer loads in the energy market, and
- The in-built measurement capability in technology such as streetlights and electric vehicle (EV) chargers to be used instead of installing additional meters.

SMA Australia Pty. Ltd.

ABN: 44 127 198 761

Address: Level 1, 213 Miller Street, North Sydney NSW 2060

Tel.: 1800 SMA AUS

Web: www.SMA-Australia.com.au



We strongly support the AEMC's stated intention that this will be a voluntary framework. We believe the proposed arrangements would benefit some consumers, but they would not be advantageous to all consumers. By implementing the changes through a voluntary framework, the rule change will promote innovation and competition, and enable better integration while ensuring customers can choose the arrangement that best suits their needs.

We look forward to engaging with the Australian Energy Market Operator and the Australian Energy Regulator (AER) as they develop procedures and amend guidelines to enable the policy to be implemented in full.

I have enclosed a submission, which is in a format suitable for publication on your web site. SMA-Australia's head of Energy Policy and Regulation, Darren Gladman, will continue liaising with you on our behalf.

Best regards,

A handwritten signature in black ink, appearing to read 'Doris Spielthener', followed by a long, horizontal, wavy line that extends to the right.

Doris Spielthener
SMA Australia
Regional Manager APAC & Managing Director Australia & NZ

SMA Australia Pty. Ltd.

ABN: 44 127 198 761

Address: Level 1, 213 Miller Street, North Sydney NSW 2060

Tel.: 1800 SMA AUS

Web: www.SMA-Australia.com.au



SMA-Australia Submission to the Australian Energy Market Commission Draft Determination on the National Electricity Amendment (Unlocking CER benefits through flexible trading) Rule

SMA-Australia welcomes the opportunity to provide feedback to the Australian Energy Market Commission (AEMC) Draft Determination on the National Electricity Amendment (Unlocking CER benefits through flexible trading) Rule.

As a leading global specialist in photovoltaic system technology, SMA is setting the standards today for the decentralized, digital and renewable energy supply of tomorrow. With headquarters in Germany and more than 3,800 SMA employees in 20 countries SMA has been devoted to this task for 45 years, also having invented the first string inverter.

Our product range spans the home rooftop sector, commercial and industrial applications and large utility-scale applications in the multi-megawatt range. We supply grid-connected inverters as well as inverters for independent, stand-alone systems. Our product range also includes storage solutions for battery systems of all sizes. Our PV solar inverter and battery storage products are complemented by components for energy management, system monitoring, and data analysis. SMA has a global inverter capacity of 140 GW in more than 190 countries and more than 9GW inverter capacity in the Australian market from smaller residential systems to large utility scale solar farms. We have over 110 employees across Australia with headquarters based in Sydney.

SMA supports the proposed changes which would create new arrangements for:

- Large customers to choose multiple energy service providers,
- 'Flexible' consumer energy resources (CER) to be identified and managed separately from 'passive' consumer loads in the energy market, and
- The in-built measurement capability in technology such as streetlights and electric vehicle (EV) chargers to be used instead of installing additional meters.

We strongly support the AEMC's stated intention that this will be a voluntary framework. We believe the proposed arrangements would benefit some consumers, but they would not be advantageous to all consumers. By implementing the changes through a voluntary framework, the rule change will promote innovation and competition, and enable better integration while ensuring customers can choose the arrangement that best suits their needs.

We urge the AEMC to monitor the experience of large customers who choose multiple energy service providers and to consider the merits of extending this approach to smaller customers in future.

We look forward to engaging with the Australian Energy Market Operator and the Australian Energy Regulator (AER) as they develop procedures and amend guidelines to enable the policy to be implemented in full.

SMA Australia Pty. Ltd.

ABN: 44 127 198 761

Address: Level 1, 213 Miller Street, North Sydney NSW 2060

Tel.: 1800 SMA AUS

Web: www.SMA-Australia.com.au