

7 March 2025

Anthony Lean  
Secretary  
NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW)

Lodged online: <https://www.haveyoursay.nsw.gov.au/solar-emergency-backstop>

Dear Mr Lean,

**NSW Emergency Backstop Mechanism and Consumer Energy Resources Installer Portal – Consultation Paper**

Origin Energy Limited (Origin) welcomes the opportunity to provide feedback on the NSW Government's proposal to introduce an Emergency Backstop Mechanism and Consumer Energy Resources (CER) Installer Portal. Drawing on experience with similar mechanisms in other NEM jurisdictions, we outline key recommendations aimed at effective implementation and mitigating potential unintended consequences.

Policy Communication & Lead Time

To facilitate industry adaptation and compliance, clear guidance on new policies, procedures, and installation requirements should be provided well in advance of their effective date. Early communication allows installers to adjust processes accordingly and ensure systems are compliant from the date of mechanism implementation – reducing project delays and the risk of asset stranding. Sufficient lead time will also help installers manage inventory, reducing the risk and financial burden of holding non-compliant equipment.

Implementation Consistency

To minimise complexity and streamline implementation, the mechanism and portal requirements should be applied consistently across all Distribution Network Service Providers (DNSPs) in NSW. Uniform standards will reduce administrative burdens and support state-wide compliance with the new procedures.

Simple & Streamlined Compliance Processes

Origin supports the CER Installer Portal's objective of enhancing compliance and data accessibility. To maximise its effectiveness and encourage widespread adoption, the portal's requirements and processes should be practical, tested in real-world conditions, and refined before full-scale implementation. To further support adoption and unlock the full benefits of the CER framework through enhanced data accessibility, integrating the portal's use into installer licensing conditions could be considered. Where possible, data should be sourced from the AEMO Distributed Energy Resource (DER) Register and DNSPs to reduce process duplication and minimise the administrative burden on installers – particularly smaller businesses. A simple and efficient system will facilitate compliance while minimising industry disruption.

If you wish to discuss any aspect of this submission further, please contact me at

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Yours sincerely,

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