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07 March 2025

[REDACTED]
[REDACTED]
NSW Department of Climate Change, Energy, the
Environment and Water
Submitted by email to:
energy.consumerpolicy@dpie.nsw.gov.au

Dear [REDACTED]

Submission – NSW Emergency Backstop Mechanism and Consumer Energy Resources Installer Portal Consultation paper

Essential Energy welcomes the opportunity to respond to the NSW Department of Climate Change, Energy the Environment and Water (NSW DCCEEW or the Department) on its Consultation Paper (the Paper) regarding the introduction of an NSW Emergency Backstop Mechanism (the Mechanism) and Consumer Energy Resources (CER) Installer Portal (the Portal). Essential Energy has actively engaged with the Department on the development of the Mechanism and the Portal and has appreciated the collaborative effort undertaken with the Department and NSW Distribution Network Service Providers (DNSPs) on the project to date.

Essential Energy supports the need to implement backstop capability to support the Australian Energy Market Operator's (AEMO) management of power system security, including management of Minimum System Load (MSL) emergencies with rapidly growing levels of distributed photovoltaic (DPV) installations in distribution networks. However, once in place, the backstop mechanism needs to be used only as a last resort and should be utilised alongside a range of other measures and incentives to increase demand or manage the risk of MSL, during critical periods. The Mechanism therefore becomes part of a suite of measures to support system stability during MSL events.

Integral to the Mechanism is the implementation of the Common Smart Inverter Profile – Australia (CSIP-Aus) protocol, which will enable communication with inverters through DNSP utility servers. CSIP-Aus can also enable flexible exports, which will allow more unconsumed CER generation to be exported to the grid, when the network is able to accommodate it. Used in this way, a mandate for solar systems in NSW to be CSIP-Aus compliant becomes part of a broader backstop obligation, which is complemented by alternative measures to avoid solar curtailment as a last resort.

To assist with compliance, we also support implementation of the Portal to harmonise the installation and commissioning process for CER on the three NSW distribution networks. Once operational, the Portal will improve compliance with CER technical standards in NSW through a mandatory commissioning, registration and testing process which will provide greater visibility of installations on networks and support the introduction of the emergency backstop mechanism.

Capability vs Capacity

Essential Energy notes that the reforms outlined in the Paper are designed to deliver the Mechanism capability – through implementation of the CSIP-Aus protocol – by Spring of this year. The Paper acknowledges that implementation of the capability to respond to AEMO directions to control system during MSL events will develop into a ‘controllable capacity’ over time.¹ The timeline for delivery of this capability is in response to AEMO’s forecast for an unmet capacity of around 200MW in NSW, to respond to MSL events expected to occur by Spring 2025.²

The timing to deliver the capability and the need for capacity means that if an MSL event were to occur from Spring 2025, there will be no initial capacity in the Mechanism for AEMO to call upon. Therefore, DNSPs will be required to respond to such an event using other measures, which are likely to include reverse-flow feeder shedding, resulting in customers’ loss of electricity supply. While the discrepancy between capacity available and capacity required is expected to diminish over time, during the initial years of the Mechanism, DNSPs will rely heavily on complementary measures to meet AEMO’s capacity needs without needing to resort to shed customers from supply. It is important to consider implementation of the Mechanism holistically and in the context of the risks the Mechanism is designed to address.

Complementary measures

Essential Energy defines complementary measures as additional strategies, tools or policies implemented alongside the Mechanism to support its purpose, which is to maintain grid stability during MSL events. These complementary measures are not the primary curtailment action itself. Complementary measures can be integrated into broader system management strategies to mitigate the risk of MSL events occurring and the requirement to activate the Mechanism. There is also no single measure that can be undertaken, independent of others, to fully mitigate the risk. Such complementary measures do seek to optimise renewable energy integration and mitigate power system security impacts that flow to individually connected customers. Complementary measures can be broadly defined into two categories:

- ▶ **Category 1 measures:** including purpose-built solutions where DNSPs take proactive steps specifically to manage MSL risks and reduce reliance on the Mechanism, and
- ▶ **Category 2 measures:** including measures with a broader primary purpose, but that can also serve a secondary role in mitigating MSL events before customer curtailment needs to be activated via the Mechanism.

Category 1 measures demand direct DNSP investment and are implemented specifically to support the goals of the Mechanism through managing MSL risk to avoid the need to curtail customers. There is a role for the NSW Government to consider these types of measures under changes to licence conditions to be delivered as part of the obligations on DNSPs to implement the Mechanism. Without obligations, DNSPs do not have a mandate to bring forward the necessary investment to implement complementary

¹ NSW DCCEEW, NSW Emergency Backstop Mechanism and Consumer Energy Resources Installer Portal – consultation paper, February 2025, p. 24.

² AEMO, Supporting secure operation with high levels of distributed resources Q4 2024, p.9.

measures as part of the backstop mechanism. The trade-offs, and the need to balance objectives of different stakeholders is discussed in greater detail under the licence conditions section.

Category 2 measures, though designed for broader purposes, add value by boosting system demand or minimising power outage or curtailment risk during MSL events. This additional benefit should be evaluated for prudence and efficiency within the cost-benefit analysis supporting such investments. The obligation should also reflect the value that these complementary measures contribute, while providing flexibility regarding delivery. Complementary measures are discussed within their respective categories.

Examples of complementary measures are provided below, but do not represent an exhaustive list.

CATEGORY 1 COMPLEMENTARY MEASURES: INITIATIVES PRIMARILY FOR MSL EVENTS

Flexible Export Limits

Essential Energy considers flexible exports, otherwise known as ‘Dynamic Connections’ in Essential Energy’s connection agreements, an important element of the framework to mitigate the risks caused by MSL and increase customers’ value from their solar investments.

Currently, a customer’s export limit is informed by peak export (and low consumption) times which occur for short duration of time, on a few days in the year. However, if the export limit is not flexible, it continues to be applied at all other times when the network can accommodate considerably greater exports. It is worth noting that these export limits apply at the connection point, so they also limit the ability of customers with batteries to participate in Virtual Power Plants.

While Dynamic Connections may not be necessary for the operation of the Mechanism, once implemented, such arrangements will allow DPV (and eventually vehicle to grid) customers to export more of their unused generation into the network, when the network has additional capacity to accommodate it. Increased exports allow customers to optimise returns on their CER investments faster.

Without Dynamic Connections, new CER customers will face a low non-zero static export limit, which will only result in a perception of negative outcomes as a result of activation of the Mechanism, including:

- ▶ Lower export limits than those customers with legacy DPV systems
- ▶ Obligations to maintain compliance of their systems, and
- ▶ Potential for curtailment of exports during an MSL event.

Essential Energy is concerned that, without Dynamic Connections, the Mechanism is all stick and no carrot for consumers, which risks social licence for the Mechanism in a period where consumers are highly sceptical of two-way pricing for exports. Further, there is an increased risk of customer non-compliance in having their system connected to the internet.

For a modest incremental investment in system optimisation, DNSPs can implement Dynamic Connections to adjust solar export limits based on real-time grid conditions, which will allow higher exports when the network can accommodate it and decreased exports during low-demand periods prone to MSL events. Implementing Dynamic Connections as a key part of the Mechanism would necessarily link Actions 34 to 43, 37 and 44 of the NSW Government’s Consumer Energy Strategy (CE Strategy).

Hot water load control

Hot water load control allows DNSPs to turn electric hot water systems on or off remotely (often via ripple control or smart meters) to shift their demand. Flexibly shifting hot water load has in the past been used as a legacy demand management tool, where controlled load tariffs (e.g. Tariff 33) incentivise off-peak usage – smoothing daily peak loads. Further, it has been used on high demand days where AEMO has requested voluntary load curtailment to reduce the risk of potential load shedding. However, with the rollout of smart meters by retailers, DNSP direct control of hot water systems is organically reducing over time. Some DNSPs have access to legacy systems (with varying capacities), but in order to use bulk hot water control to address MSL events, DNSPs would be required to invest in new systems and integration to override or coordinate with retailer control of hot water system.

To this end, Essential Energy has signed a Dynamic Load Control agreement with a major retailer in its area to enable it to shift load according to optimised outcomes within time schedules set by Essential Energy. In the longer term, this will allow Essential Energy to move to Dynamic Connections for controlled load and increase load during peak solar generation, hence minimising the risk of minimum and maximum demand events.

Emergency Voltage Management (EVM)

Due to the regional and rural nature of the Essential Energy network, customers face safety and appliance damage risks if voltage is not carefully and actively managed. To implement EVM, Essential Energy would need to invest in systems that ensure that the most vulnerable customers are protected when voltages are raised to implement the Mechanism.

CATEGORY 2 COMPLEMENTARY MEASURES: BROADER PURPOSE WITH MSL BENEFITS

Energy Storage Integration (e.g. Batteries)

The primary purpose of battery deployment, whether by DNSPs, households, or third parties, is to store renewable energy for general use (e.g. peak shaving, outage backup) and for participation in energy markets. Additionally, by absorbing excess solar generation during low-demand periods, batteries can incidentally reduce export pressure, helping mitigate MSL events as a byproduct. Deployment of storage has been cited by AEMO as a key mitigant to the power system security risks posed by MSL. Use of network batteries to mitigate against the risk of MSL events also feeds into the NSW Government's CE Strategy under Actions 17 and 18, which seek to enable NSW distribution networks to support the uptake of local network batteries – and support household and small businesses to access community batteries.

DEMAND RESPONSE PROGRAMS

Unlike MSL-specific incentives, general demand response initiatives aim to balance supply and demand across various scenarios (e.g. peak load management). They can also increase load during MSL events if activated, offering a helpful but not primary MSL mitigation function.

Obligation on DNSPs – licence conditions and funding

The Paper acknowledges that the costs of implementation of the Mechanism and complementary measures to meet AEMO's capacity needs have not been factored into the NSW DNSPs' current 2024-29 regulatory period. The AER approves expenditure forecasts of DNSPs once every five years. Any new

spending that arises during the period must either be applied for as part of a cost pass-through application, or the needed funds re-prioritised from within the existing funding allowance.

For cost pass-through applications, materiality thresholds apply. If the costs of new expenditure do not meet the minimum threshold, or are not approved by the AER, then funding will need to be re-prioritised from the DNSP's existing funding envelope. This means that funding which was allocated for other projects – identified and agreed with Essential Energy customers through extensive consultation as necessary to improve customer outcomes – must then be re-directed toward the new priority.

In the case of the Mechanism, without Dynamic Connections, the Mechanism itself does not have a direct benefit for customers outside of grid-system stability. While Essential Energy agrees that in the event of a MSL event, customer outcomes would be worse without a Mechanism in place, customers do not experience the benefit of the Mechanism in the same way as they might other investments to improve network performance or resilience.

Public understanding of the need for the Mechanism and two-way export pricing is not well-understood or accepted. Before the Mechanism is implemented, there is a need for the government to undertake meaningful engagement with customers and establish social licence for the change. If implementation of the Mechanism requires DNSPs to defer promised investments in their networks, this social licence becomes much harder to achieve.

For Essential Energy, funding the Mechanism from within the existing envelope will most likely reduce our capacity to invest in approved resilience-related priorities during the 2024-29 regulatory period. This will necessitate deferral of spending to mitigate some risks of climate change for communities across our footprint until 2030 and beyond. For these reasons, any new obligations placed on DNSPs, which require significant funding, need to – as far as is practicable – ensure that DNSPs can recover the costs of the new obligation without requiring re-prioritisation away from other customer-focussed projects.

The Paper considers that a change to NSW DNSPs' licence conditions is the preferred means to require the implementation of the Mechanism and the Portal, though it also considered a ministerial order under the *Electricity Supply Act 1995* (NSW). The paper then provides a high-level overview of the proposed requirements to be set out in licence conditions. The purpose and impact of change to licence conditions is as follows:

- ▶ To set out new performative requirements/obligations for DNSPs which can be evaluated against in annual compliance reporting
- ▶ The set of performative requirements/obligations then provides a “trigger” for DNSPs to undertake necessary investments and other actions needed to meet the new obligations.

Accordingly, any new licence conditions for the Mechanism's implementation need to ensure that the objectives of such changes are met through appropriate reporting, and that DNSPs can invest in the technologies required without reprioritisation of expenditure from other projects. Licence condition changes need to be finely balanced between providing sufficient detail to ensure objectives are met, while providing enough flexibility to account for different approaches between the three NSW DNSPs to implement the Mechanism and mitigate MSL risks. These licence condition changes also need to take into account the impact to customers and whether the required investments are in the long-term interests of consumers.

Essential Energy also understands that in the current environment, customers are price sensitive. It is therefore important that any obligations placed on DNSPs strike the right balance between the objectives of delivering system stability, allowing appropriate cost-recovery and providing customers with value from those investments. Therefore, Essential Energy strongly recommends that the Department work with NSW DNSPs on the design of the obligations to meet the objectives of the Mechanism, taking into account technical capability, AEMO's capacity requirements to meet MSL events and customer value.

Backstop and Portal implementation timing

Essential Energy has been working in close collaboration with the Department and other NSW electricity distributors on the design and delivery of the CER Portal project. We agree that the CER Portal will increase compliance with standards and provide more accurate reporting of CER installations on networks, allowing for better system management to the benefit of all network customers. We also support a common installer experience for all CER installations in NSW as well as consistent training and communications on the experience led by NSW Government in collaboration with the DNSPs.

To maximise the potential benefits and minimise teething issues, which can affect stakeholder experience and satisfaction with the reform, it is critical that implementation be carefully planned, phased and tested before full launch and introduction of mandatory requirements on installers and OEMs. To this end, Essential Energy is concerned that a Spring 2025 launch of the Portal and Backstop Mechanism may increase the risk of unintended consequences, particularly if a pre-launch pilot and testing phase is not carried out before the Portal goes live to all installers.

Essential Energy also acknowledges that delaying implementation of the CSIP-Aus protocol and launch of the portal past Spring 2025 would come with risks for consumers. Any delay beyond this time may expose some consumers to adverse impacts such as outages and exacerbate the legacy issue caused by connecting more customers without a Mechanism in place.

As a result, Essential Energy supports the mandated requirement for category one complementary measures to accelerate its ability to meet AEMO's capacity requirements. The obligation should also reflect a timeline for implementation that enables rigorous testing of the platforms and technologies involved, as well as user experience, to iron out any bugs ahead of the full system launch. Category two complementary measures can be supported by the NSW Government through other means, including actions by the NSW Government through the full implementation of its CE Strategy.

To this end the NSW Government could:

- ▶ Issue a mandate for complementary measures to cover any shortfall in backstop capacity through to the Portal delivery date, and beyond.
- ▶ Propose a timeline for the mandatory adoption of CSIP-Aus for new installations that allows for a staged approach to allow time for industry to prepare, which could include:
 - › A transition period to allow solar retailers to run-down existing stocks of non-compliant inverters, by setting a cut-off date whereby all non-compliant inverters commissioned after that date are subject to a low static export limit.
 - › The launch of a training and education campaign, led by the NSW Government, regarding forthcoming changes and directing retailers and installers to the Clean Energy Council (CEC) - approved CSIP-Aus compliant inverter list.

- › Delay Portal reliance until supply chains for compliant inverters are secured.
- › This will also allow time to harmonise implementation between NSW DNSPs.
- ▶ Run a pilot with a limited number of installers to fully test the Portal, system registration and compatibility testing with the DNSP utility server and the commissioning process, which would allow time for testing of on-site testing procedures and timings, and for the trial, testing, evaluation and iterative development of training procedures on the new processes including training and onboarding.
- ▶ Opt-in export trials to test customer experience with installation and flexible exports.

Communication and training

The transition to mandated technical standards and a new harmonised Portal to drive increased CER installation compliance, and facilitate the Mechanism, is a significant industry change, which will require a harmonised communication and training strategy. While DNSPs have the technical experience, expertise and staff to deliver DNSP-specific communications and training, there is a considerable role for the NSW Government to provide leadership to coordinate clear, consistent and easy to understand materials for all stakeholders. DNSPs are able to assist with delivery, but the holistic design, incorporating other priority actions under the NSW Government's CE Strategy should be led, and the launch publicly supported, by the NSW Government.

For example, Action 39 of the CE Strategy outlines the commencement of a review of the NSW Electrical and Gas Safety regulatory framework will look at the governance arrangements with regard to the oversight of technical regulations. The review will likely result in changes related to interconnected portal functions, such as the submission of Certificate of Compliance for Electrical Work (CCEW), which will need to be communicated to stakeholders in a phased manner. This will need to be consistent with the coordination and rollout of other related action items, including Action 34 regarding the implementation of flexible exports. As a result, it is important that the NSW Government have a communications strategy that addresses concerns of stakeholders and allows for consistent messaging across the NSW DNSPs.

The NSW DNSPs have appreciated the collaborative relationship with NSW DCCEEW to date. To deliver on the Mechanism, the Portal and other related priority action items in the NSW Government's CE Strategy. Continued progress will require ongoing collaboration as we work together to meet the needs of the NSW electricity system and its customers.

Essential Energy responses to selected consultation paper questions are provided in Attachment A.

If you have any questions in relation to this submission, please contact me on [REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]

Attachment A: Essential Energy responses to selected consultation questions

CONSULTATION QUESTION

ESSENTIAL ENERGY RESPONSE

1 - Do you support the requirement for NSW DNSPs to harmonise their implementation of the backstop mechanism? If not, please explain why.

Harmonisation of customer and installer processes - user experience - across the NSW DNSPs is important for the successful delivery and ongoing management of CER connections and compliance in NSW. This should not be read to assume this requires the DNSPs to procure, implement or operate same technologies, i.e. connections portal or utility server technology.

Harmonisation in this context, is more for the installer, manufacturer, technology provider and customer experience. In particular the communications, training/on-boarding materials and resources, customer information and high-level process steps and actions which should be aligned and consistent where practicable (allowing for network footprint variants) to support a consistent user experience state-wide.

National testing, accreditation, and listing for CSIP-Aus compliant systems, and a national Public Key Infrastructure for CER will be key to harmonising implementations. Projects focused on achieving immediate and long-term solutions for these are being initiated. NSW Government support can help deliver these in time to achieve harmonisation in NSW backstop implementations.

2 - Are the scope and timelines for the Emergency Backstop Mechanism feasible? If not, please explain why.

Essential Energy is working to an early Spring 2025 delivery date to help support the mitigation of the minimum demand issues for NSW and avoid consequential outages for customers. While adjusting the timelines to ensure a smoother delivery may at first seem like a sensible idea, this could lead to a greater risk of negative outcomes for NSW customers during a minimum system load event occurring in the intervening period. It could also perpetuate a legacy issue by connecting more customers without a backstop mechanism.

For example, Essential Energy forecasts that a six-month delay to the implementation of a mandate for the installation of CSIP-Aus compliant inverters would result in around 12,000 customer installations installed under the legacy framework and consequently weaken the capacity of the backstop mechanism. In the event of a delayed start to the implementation date, one alternative to mitigate against these risks, is to include in the licence obligation alternative solutions which require



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3 – Do you agree with the order of the hierarchy of measures to increase load in the grid during MSL events? If not, please explain why

less in-depth customer engagement and training such as network management, hot water load control and batteries. These are discussed in the accompanying letter under complementary measures.

In the event the implementation timeline is pushed back, Essential Energy supports a timeline which allows for a thorough launch process which includes a pilot study, testing and refining to eliminate any teething issues which might arise during the launch.

While the AEMO hierarchy framework is helpful, there is more that DNSPs can do, and should be reflected in the hierarchy. For example, high voltage connected non-scheduled generation is currently missing and should be at the top of the list. The second should be LV connected systems larger than 200kW, which is also missing.

Notes on 1,3,4 in the hierarchy in the consultation paper:

1. Hot water load shifting in and of itself does not guarantee that hot water will be turned on during the middle of the day. Sophisticated systems are needed so that when MSL is forecasted, hot water is kept off during the preceding night.

3. Solar disconnection should be reduction to 0kW generation to minimise impact on customers. Disconnection has had issues in other jurisdictions. Systems don't always reconnect and require installer visits to remediate. Avoid customer impact by requiring reduction of generation to 0kW instead of disconnection.

4. Don't assume that DNSPs can do EVM today. Essential Energy will need to develop a system that ensures customer safety and mitigates the risk of customer appliance damage

4 – Are the design elements of the Emergency Backstop Mechanism appropriate and feasible? If not, please identify why and provide any alternative suggestions.

Essential Energy supports the design elements of the Mechanism overall but notes the following:

- ▶ The first check for device functionality is checking for appropriate inverter and client testing and accreditation. Only so much can be done on site.
- ▶ Ongoing conformance monitoring should be a separate design element as it goes beyond device functionality at the time of install. Appropriate ongoing testing, monitoring and analytics should be

CONSULTATION QUESTION

ESSENTIAL ENERGY RESPONSE

	<p>implemented by DNSPs to report issues that may arise later (e.g. through a faulty firmware update from an OEM)</p> <p>► Management system is important.</p>
5 – Are the roles and responsibilities of each organisation appropriate and feasible? If not, please identify why and provide any alternative suggestions.	Yes, noting the above. In addition, device functionality responsibility also includes the OEM and technology providers, and will also include the party (or parties) responsible for testing, accreditation, and listing of CSIP-Aus systems.
6 - Do you support the threshold for the Emergency Backstop Mechanism using CSIP-AUS being 200kW and smaller? If not, please provide detail on what threshold you think is appropriate. I. Do you agree with the approach for systems above 200kW? If not, please explain why and provide any alternative suggestions.	Essential Energy agrees that CSIP-AUS should be the mandatory technology for compatible devices below 200kW, and that above 200kW it should be at the DNSPs discretion. Essential Energy is planning to implement SCADA control for systems above 200kW – which as discussed in the letter should form part of the obligation to ensure larger systems are curtailed first before curtailment of residential systems.
7 - Do you have any concerns or insights into using CSIP-AUS compatible inverters and an internet connection to control the backstop mechanism?	Yes. Once the mandate for the for implementation of CSIP-Aus has passed, systems that are not CSIP-Aus compliant should not be allowed to be installed.
8 – Is it appropriate for the Emergency Backstop Mechanism to be implemented using technologies and systems consistent with enabling the future use of flexible export limits? If not, please explain why. Yes, this should be encouraged to benefit NSW customers	Yes, leveraging the framework of dynamic connections lays the foundation for future benefits in managing the deployment of DER assets. This has already been demonstrated in other states (e.g. SA) and is already on our roadmap. Flexible Export Limits are designed to provide benefits to customers through increased solar generation exported to the network when the network can accommodate it, as well as increasing network utilisation.
9 – Which, if any, existing test protocols should be considered for implementation as the consistent test protocol for NSW?	The current approach is to rely on the testing performed by SAPN and included in the CEC list. We, in alignment with the other NSW DNSPs, are fully supportive of national testing and accreditation of CSIP-AUS compliant systems, including an interim arrangement being progressed by the Australian



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National University. This should provide a means to test new systems before they are enabled for backstop.

10 – Do you think the conditions under which the Emergency Backstop Mechanism could be used are appropriate? If not, why? Please suggest any alternative conditions that should be considered

Essential Energy considers that while the steps outlined for the MSL conditions are appropriate, there is more that DNSPs can do – if empowered through licence conditions to do so – to reduce the likelihood for the need to employ MSL 3 emergency backstop capabilities.

Complementary measures that are part of the backstop mechanism, those that are complementary to the backstop mechanism and those that incentivise and facilitate customer take-up and acceptance of the backstop mechanism will all play a role. See the accompanying letter for a more fulsome response.

11 – Do you have any views on the proposed implementation pathway (variation of DNSP licencing conditions) or alternatives?

We support the proposed approach of varying the DNSP licensing conditions. This has two critical aspects:

- ▶ It will provide DNSPs the relevant framework to ensure that all parties can be guided to follow the requirements. We will be able to set specific requirements on account of the license variation.
- ▶ It will allow us to request a cost pass-through from the AER and by so minimise the financial impact of deploying backstop within a short timeframe and outside the approved regulatory budget cycle.

12 – What information will manufacturers, installers, customers and distribution networks require to implement the Emergency Backstop Mechanism?
I. Who is best placed to communicate this information to the different audiences?
II. How should this information be best communicated to the different audiences?

The communication owner, depends on the type of communication for example;

- ▶ Operational information in regards to how often backstop is likely to be required needs to be provided by AEMO
- ▶ To ensure aligned communications NSW Government should cover the backstop requirement
- ▶ DCCEEW as the owner of the Portal should provide communication for anything specifically pertaining to the Portal and proposed associated processes;

DNSPs for the application, offer and enquiry processes and anything related to the dynamic connections offers.



CONSULTATION QUESTION

ESSENTIAL ENERGY RESPONSE

13 – What CER should the Portal capture? Please explain the reasoning behind your answers.

I. What types of technology?

II. What size (capacity) of technology?

III. What technology should be excluded? Why?

IV. Should the Portal align with the Emergency Backstop Mechanism in capturing only systems under 200kW?

V. Should the Portal capture technology consistent with that recorded in AEMO's DER register? Is there additional technology that should be captured?

IV. Yes, the Portal should be designed to capture all installations <200kW The Portal is a mechanism designed to improve compliance of smaller CER installations, with the CSIP-Aus protocol effecting communications with these systems.

14 – Do you support the functions outlined for inclusion in the CER Installer Portal? If not, please explain why.

Essential Energy will continue to work with NSW DCCEEW and the other NSW DNSPs on the design and functions of the Portal, taking into account other stakeholder feedback through this consultation process. Essential Energy considers the functionality of the Portal vital to meeting its objectives to increase compliance with standards, provide a streamlined and harmonised installation process and deliver the needed visibility and information to responsible parties, institutions and other stakeholders.

NSW DNSPs have been working collaboratively with DCCEEW on detailed process mapping to ensure the Portal achieves its desired purpose. Importantly the process design needs to be flexible to account for different internal installation processes between the three NSW DNSPs, future-proofed and adaptable to any changes to roles and responsibilities arising from Actions 38 and 39 of the CE Strategy.

15 – Are there any additional functions you would like to see included within a CER Installer Portal?

Ability to update and inform 'existing device' data – this will enable remediation of historical CER data incrementally.

16 – Are there additional ways that the Portal should be designed to support installers?

Mobile app for on-site submission of as installed data; ability to commence registration, testing and commissioning process on-site and complete 'as installed' process off-site
Solution should allow for data capture online or offline; if the process is commenced online and then connectivity drops the installer should be able to proceed with their data capture and the data should



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	be retained and synched to the Portal when the app is connected. (Online/offline form synch capability)
17 – Do you agree that the party that applies for a CER connection should be responsible for ensuring the installers they have engaged rectify non-compliance? If not, please explain why.	Yes, we agree that it should be the responsibility of the person *(solar retailer or other agent) to ensure compliant installation. The current process of issuing non-compliance notices to the resident/customer is flawed in that the resident/customer rarely understands the compliance requirements and has no ability to hold the installer to account, whereas the Applicant does.
Question 18 – Do you have any other views on compliance and enforcement within the Portal?	Would like to understand how the DCCEE Portal will be designed and implemented to achieve the compliance monitoring and management outcomes required by all three DNSPs to mitigate power quality and other network risks.
20 – Do you agree with the phased approach proposed for the delivery of the Portal? If not, please explain why.	Yes, Essential Energy agrees that harmonisation of the connections applications process is not a high priority at this point in time. The Portal needs to focus on the installation and commissioning process. The Portal plays an important role in enabling the backstop mechanism, which is one of the primary objectives of the reform program.
21 – Do you think that there are any functions that should be included or excluded from the first phase of the Portal development?	Compliance monitoring and management capability should be included in the first phase of Portal development following a comprehensive statewide compliance uplift strategy. The Portal on its own will not manage compliance.

