

I, [REDACTED] representing RACV Solar, would like to submit the following information regarding the planned implementation of the Solar Backstop program, especially based on our experience in Victoria.

In Victoria, the experience of the backstop program implementation has been difficult. The greatest issue we have faced, as an installer, has been the impact the backstop protocols have had on legacy systems. The initial approach we were advised upon was that unless a like-for-like warranty replacement occurred, legacy systems would need to be brought up to the specification if any changes occurred. This was against the advice the government department had provided, which was if a legacy system was in place, if a new system was installed at the same parent NMI (such as a secondary system beside it or as part of an embedded network), the legacy system could be ignored for the purposes of backstop. This process has been a mess with different interpretations of this policy.

Secondly, in Victoria, the DNSPs have developed different approaches into how the installers confirm the systems installed are compliant with Backstop protocols. Each DNSP developed a slightly different approach, some of which can be done prior to the CES issued, others afterwards. This has created confusion and a complexity for installers to be able to successfully do the protocol testing. We as installers would like for the DNSPs in NSW to adopt the same approach across the board for the testing, however that testing occurs.

Lastly, each DNSP in Victoria has their own list of approved inverters for use, which is similar but not identical and relies on both the CEC list as well as Solar Victoria's approval. This has been chaotic at best, with several delays and issues, especially for new devices and battery inverters, such as Powerwall 3s and Sigenergy systems. We would appreciate that NSW ensure that one approach and list is used and that the DNSPs ensure that they can work with all approved systems, whether it be an NSW focused list or the CEC approved list.