

NSW Department of Climate Change, Energy, the Environment and Water

Submission on the NSW Emergency Backstop Mechanism and Consumer Energy Resources Installer Portal.

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Submitted via www.energy.nsw.gov.au

SolarEdge is a leading global PV inverter manufacturer with over 4.2 million monitored installations. The company was established in 2006 and invented an intelligent inverter solution that revolutionizes the way power is harvested and managed in a solar PV system. The SolarEdge DC-optimised inverter solution maximizes power generation at an individual panel level while lowering the cost of energy produced by the solar PV system.

SolarEdge entered the Australian Market in 2015, the higher level of safety and performance compared to traditional string inverters has made the company extremely successful with Australian home and business owners. SolarEdge now offers a range of optimised solutions for the residential, commercial and utility market, such as home batteries, EV chargers, hot water controllers and a range of controllers and automation products to maximize the utilization of renewable energy for our customers.

Based on the average rates for 2024 SolarEdge anticipates annual installation numbers for New South Wales of SolarEdge systems would be upwards of 8,000 p/year, assuming a market of similar regulatory structure.

SolarEdge has had a leading role within the Australian industry with the development the emergency backstop mechanism since the initial rollout of the Remote Disconnect Reconnect (RDR) procure for SAPN on 28 September 2020 as part of the South Australian Government's "Smarter Homes" Regulations.

With the developing requirement for Dynamic Connection requirements and the implementation of CSIP-AUS, SolarEdge became the first company to have inverters become natively compliant to the procedure and become listed with the Clean Energy Council ahead of the flexible export rollout in South Australia that came into effect on 1 July 2023.

SolarEdge also took a leading role in Victoria, working with all of the networks to support the development of the utility servers and have had native compliance for the Emergency Backstop Mechanism since its launch.

SolarEdge is an active member of the DER API Integration Working Group and is a key participant in the Smart Connect project aiming to achieve National coordination of CER integration.

To support Victoria in addressing the issues faced by the industry, due to the nature and speed of the rollout of the Emergency Backstop Mechanism in the state, SolarEdge is also sits on DEECA's Emergency Backstop Reference Group.

SolarEdge welcomes the opportunity to submit to New South Wales our position and recommendations regarding the proposed implementation of the NSW Emergency Backstop Mechanism and Consumer Energy Resources Installer Portal.

Answers to specific questions:

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

Yes, in principle, harmonisation of the backstop mechanism implementation is logical and greatly needed. However, what is not clear from the consultation paper is what does harmonisation actually refer to. It sounds like it is purely the development of the utility server which is only one component of the implementation process.

SolarEdge supports the intention that there will be a mechanism to ensure that there will be no additional accreditation and test obligations beyond those currently required in other Australian jurisdictions.

Currently, in Victoria there are two utility server providers, GE and Itron. OEMs have now been through the development and implementation work via these companies. A good solution for NSW would be to ensure that the DNSPs adopt servers from providers currently operating in Australia for CSIP-AUS / Backstop Mechanisms as this would be the best way to adopt a consistent approach to implementation.

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

Absolutely not.

The rollout for the Emergency Backstop Mechanism in NSW isn't happening in isolation of other states.

The industry has ongoing support requirements for South Australia and an ongoing crisis to address in Victoria. Synergy in Western Australia is also looking to introduce CSIP-AUS in Q4 2025. Energy Queensland is also said to be considering moving across to CSIP-AUS from the SEP2.0, which is currently implemented. Adding the development work and focus required for NSW is extremely unlikely to achieve the results expected within the timeframes specified, which will adversely affect the industry and consumers. It is very unlikely that both the networks and OEMs cannot be up and ready in time or solely focus on the requirements for NSW.

The rollout of CSIP-AUS as a process to manage Emergency Backstops makes it sound simple. In reality, what is being rolled out is the implementation to deliver Dynamic Export and Import control, as such,

unlike in South Australia where the initial RDR command was only sent when a curtailment scheduled event was necessary. The rollout in Victoria of CSIP-AUS requires constant commands from as little as every 5 minutes that also require a response from the inverter (or management device) to verify receipt. This is a much more complex and data-heavy requirement than it would appear.

In South Australia, when Flexible Exports was rolled out, which in principle is exactly the same function as is being proposed for NSW, they did so via a single utility server with a single onboarding and delivery process. They initially ran a trial, then expanded to 37 suburbs which commenced on 1 July 2023, and then finally in 2024 expanded across the entire state with an intention to have Flexible Exports rolled out state-wide by the end of 2024 which was achieved.

In Victoria, they attempted to rollout the same communication and control mechanism at the same time, via three utility servers, all with unique interpretations of CSIP-AUS and different requirements. It did not work and has faced multiple server outages, and suffered from overloaded support requests by installers to the networks. OEMs having to step in and support where possible. Convolved and confused requirements for existing systems as well as an inspection regime that has created delays and yet more industry challenges.

NSW is proposing to go the same route with the added complexity of also adding in a new and completely untested installer portal.

It is worth noting that testing the full process is impossible until it goes live. This creates a challenge for the entire industry as issues will not and cannot be known beforehand. For this reason, SAPN carried out a trial and a staged rollout. It is evident that the decision to not go this route in Victoria is costing the industry heavily.

Question 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.

MSL1 and MSL2 are logical and agreed to be correct.

MSL3 however poses issues as the definition of 'Solar disconnection: preventing solar systems from generating electricity' is unclear as it implies that only PV generation will be stopped. But, as has been implemented in Queensland, under their interpretation of the Emergency Backstop Mechanism we see inverters being turned off comply. The unforeseen outcome of this mechanism is that it will also turn off the system's ability to charge batteries, which in the event of high grid penetration, as the networks are attempting to bring load onto the grid having the ability to ensure that batteries are also able to charge is imperative.

MSL4, Emergency voltage management is a very heavy-handed response, but it is agreed by SolarEdge that this may be required, primarily to be able to manage all the existing fleet of inverters which are unable to operate under the Emergency Backstop Mechanism. Increasing grid voltage will only increase power consumption in the grid due to all residential renewables shutting off by disconnecting all, not some, non- Backstop Mechanism registered and enabled solar inverters. Only inverters installed after the

launch of this policy will be 'Backstop Enabled' although there will be a considerable fleet of inverter installed prior with CSIP-AUS built in capabilities that if onboarded with the networks, can become part of the backstop fleet. To enrol these systems onto the mechanism will require considerable effort by primarily the OEMs that it is only fair should be compensated for this effort to support AEMO and the networks. It is also worth noting that voltage management will cost the consumer, no longer will they be able to utilise any self-generated solar production, or charge batteries, and in addition the cost per kWh of energy being consumed will dramatically increase during this period. The consumer therefore is having to pay for the grid support and service function without any consideration of compensation for the lack of pre-planning and foresight of AEMO or the networks.

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

1. **Device functionality:** Conformance validation at the time of installation is not feasible as most OEMs have implemented processes both in SA and VIC for the backstop, or flexible export registration and onboarding to occur via web portal that admin staff of the business access on the day's following the installation. Therefore, allowance needs to be given for retail business process to complete conformance validation. Rectifying non-conformance falls on both the installer and the network. One of the biggest issues faced in Victoria is the lack of visibility of where the issue sits within the process, for instance is in an install issue, a configuration issue, and issue with the OEM or an issue with the Network (in NSW the proposal of the installer porter adds this also to a location of potential fault). The responsibility for rectification of non-conformance will fall on many parties and there needs to be equal accountability and expectation on each entity to ensure functionality.
2. **Communication protocol:** These are appropriate, although OEMs also should be considered as responsible organisation.
3. **Communication network:** Only the DNSPs have been identified in the consultation paper as being the responsible organisations, but, the installation itself and the means of communication, that are set by the installer. And the communication mechanism set by the OEM are also critical paths. Therefore, both of these entities should also be considered as having responsibility.
4. **Management system:** Prediction of the amount of DPV generation (MW) available for curtailment ahead of time to sufficient level of accuracy is feasible. Verification of the amount of DPV generation curtailed and visibility (or estimation to sufficient level of accuracy) of the amount of DER generation still operating is less clear as is this value only coming from the self-consumption value of systems under control, or, is this value taking into consideration all DPV in operation at the time of an event (legacy systems). Coordination to ensure distribution network remains within operational limits during curtailment event is vital and agreed appropriate.
5. **Customer connection agreement:** As defined is appropriate and feasible.

Question 5 – Are the roles and responsibilities of each organisation appropriate and feasible? If not, please identify why and provide any alternative suggestions.

Answered as part of the previous question.

Question 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.

Yes, this threshold is supported by SolarEdge.

I. Do you agree with the approach for systems above 200kW? If not, please explain why and provide any alternative suggestions.

Yes, this approach is supported by SolarEdge.

Question 7 - Do you have any concerns or insights into using CSIP-AUS compatible inverters and an internet connection to control the backstop mechanism?

SolarEdge supports the use of CSIP-AUS compatible inverters and an internet connection to control the backstop mechanism as this 'native pathway' has already been proven in South Australian and Victoria. The only comment/insight is that it is not just the inverter that is the required piece of hardware on the customer site, it is also the metering which is encompassed as part of the IES (Inverter Energy System) as defined in the AS/NZS 4777 standards. As such, the metering and the communication between it and the inverter already has mandatory communication and fall-back requirements for operation that need to be considered and upheld.

Question 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.

Using technologies and systems consistent with enabling the future use of flexible export limits is supported as these are already the proven mechanisms in use in Victoria and South Australia.

Question 9 – Which, if any, existing test protocols should be considered for implementation as the consistent test protocol for NSW?

Currently, as all four existing utility servers (SAPN and the three in use in VIC) have different setups, there is no consistent test protocol able to be considered for NSW. In essence, to be able to consider a consistent test protocol, one of the existing protocols and utility service configurations should be chosen and replicated across all DNSPs, if this is considered to be appropriate.

Question 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.

Yes, SolarEdge does consider the conditions appropriate.

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

In principle the implementation pathways seem reasonable. The only point for clarification would be the statement to 'Harmonise their approach to implementing a CSIP-AUS enabled emergency backstop'. Is

this in relation to harmonisation to one of the other implementation methods adopted by one of the other four network utility services currently in operation, or in relation to each other? Assuming it is to one of the existing utility servers, either in Victoria or South Australia then this is supported by SolarEdge as it is plausible.

The implementation pathway could be strengthened with the inclusion for DNSPs to:

- Establish a communication network with other NSW DNSPs, OEMs and installers prior to implementation of the Emergency Backstop Mechanism to ensure transparent communication and knowledge sharing.
- Report on compliance and capacity of CSIP-Aus compliant systems to the NSW Government and Emergency Backstop Stakeholder Reference Group (see proposed reporting template below, modelled off the Victorian Emergency Backstop Mechanism approach).

Sample Reporting Framework – weekly and cumulative

- Number of sites that do not require backstop capability (Pre Spring 2025)
- Number of sites that are backstop exempt (due to no internet) – customer's export set at 0kW.
 - % of exempted sites with correct low static export limit applied
- Number of sites requiring backstop
 - Registration
 - Number of sites – registration in progress
 - Number of sites – registration successful
 - Number of sites – registration unsuccessful
- Capability Testing
 - Number of sites where testing successful
 - % of sites that required multiple tests before being successful
 - Median number of tests taken before successful, as well as plot graph of number of tests taken before successful
 - Medium total testing time taken before successful, as well as plot graph of total testing time taken before successful
 - % of sites where multiple tests required before success is due to (a) testing system issues, (b) installation issues
 - Common installers or OEMs that are experiencing multiple testing / long total testing times before success
 - Number of sites where testing unsuccessful
 - Median number of failed tests undertaken at each site
 - Median total testing time taken at each site
 - % of sites where unsuccessful testing is due to (a) testing system issues, (b) installation issues
 - Common installers or OEMs experiencing unsuccessful testing
 - Number of sites whose tests are yet to be initiated by the installers

- Number of active sites that are successfully registered and passed all capability tests –
 - This should be the total number, as well as total MW capacity of backstop-enabled systems installed in your distribution network that will respond to a curtailment command
- Number of complaints relating to backstop issues – as well as any comments on common themes

Question 12 – What information will manufacturers, installers, customers and distribution networks require to implement the Emergency Backstop Mechanism?

Manufacturers: Are required to establish the development work for inverters to be able to communicate with the utility swervers of the networks to establish the functional connection and carry out the onboarding and service requirements for the mechanism.

Installers: Will need to understand the installation, commissioning and configuration requirements. They will need to know what components they can quote, what additional equipment is required and how to install and how to comply with DNSP commissioning requirements and configuration requirements, including establishing connectivity between the device and the DNSP's server.

Customers: Will need to know what the Emergency Backstop Mechanism is, why it is being implemented and how the policy will affect their system and impact their ability to self-consume, export or import. Consumers will also need information on the importance of maintaining connectivity and whether there is any ability to 'opt out' and what that means.

Distribution networks: Will need to know what is being connected and by whom. When it is being commissioned and onboarded to the Emergency Backstop Mechanism as well as ongoing telemetry data for planning and reporting to AEMO.

I. Who is best placed to communicate this information to the different audiences?

Manufacturers: The overarching requirements need to be communicated by the NSW Department of Climate Change, Energy (DCCEEW), the Environment and Water. The development and implementation requirements need to be communicated by each of the DNSPs.

Installers: The overarching requirements need to be communicated by DCCEEW. The implementation and commissioning requirements need to be communicated by the inverter manufacturers as each will have different process requirements.

Customers: The overarching requirements need to be communicated by DCCEEW. The impact and ongoing system requirements need to be communicated by the installer.

Distribution networks: The overarching requirements need to be communicated by DCCEEW.

II. How should this information be best communicated to the different audiences?

Manufacturers: The overarching requirements from DCCEEW should be published on their website and communicated via webinar or other online meeting. The development and implementation requirements from the DNSPs need to be communicated via published documentation and discussed via webinar or other online meetings and direct meetings.

Installers: The overarching requirements from DCCEEW should be published on their website and communicated via webinar or other online meeting. The requirements from the DNSPs also need to be published on their website and communicated via webinar or other online meeting. There will also need to be documentation and training provided by the manufacturers.

Customers: The overarching requirements from DCCEEW should be published on their website so that installers can refer customers to what is being implemented out and why. The majority of the information needs to be communicated by the installer.

Distribution networks: The requirements from DCCEEW should be published on their website and communicated via webinar or other online meeting

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

I. What types of technology?

The CER Installer Portal should mirror the technology captured by the AEMO DER register.

II. What size (capacity) of technology?

System sizes less than 200kW.

III. What technology should be excluded? Why?

All system required to integrated and operate an Emergency Backstop Mechanism should be excluded.

To implement the Emergency Backstop Mechanism as well as an Installer Portal at the same time is a very bad idea given the risk of developing and launching two untested requirements at the same time.

It is impossible to test the either the Emergency Backstop Mechanism, or the Installer Portal prior to the go live date as the full process cannot be replicated. In both South Australia and Victoria, the Emergency Backstop Mechanism faced a series of unforeseen issues which had had huge impacts on the industry. In Victoria the mechanism went live on the October 1, 2024, 4 months later DEECA has had to establish the Emergency Backstop Reference Group to address all of the critical issues faced by the industry. South Australia also faced multiple issues but had the luxury of being able to contain the problems as they did not roll out the implementation to the entire state, they only did this once all of the teething problems had been addressed. In addition, SAPN transitioned their utility server to an alternative provider.

Introducing these two critical processes at the same time will also make it very difficult to identify where failure or breakdown in communication or bugs exist as there will now be four layers of interaction, the installer, the inverter, the portal and the DNSP.

SolarEdge proposes that both the Emergency Backstop Mechanism and the Installer Portal can be launched at the same time with the integration of systems relating to the Emergency Backstop Mechanism being incorporated at a later date once all systems are operating correctly.

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

Yes.

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

Electric vehicles configured charging equipment that can be controlled such as those being recorded in South Australia.

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

Integrate with DNSP connection portals: In principle this seems like a sensible idea although what is not clear as to why this is necessary. Most installers operating within a regional patch of NSW so often will only be needing to use the connection portal of one of the networks. It is very rare for an installer to need to be able to lodge applications for all of NSW, so this benefit does not align with the industry needs. Furthermore, it is not clear what duplication of information to be provided will occur and therefore it is not evident on what level of saving in terms of time there will ever be for installers.

Capture critical information about CER devices: The only critical information identified in the proposal is the serial numbers of devices. Given that all manufacturers have unique constructs for the serial numbering there will be no way to verify if the information entered is correct. This issue is already seen in the AEMO DER Register where installers often will enter default numbering to simply pass the required registration step. Without verification, the data will be useless. To verify correct serial numbers will be a huge undertaking to implement, as all devices that could be installed in NSW by OEMs will have to pre-register all of the serial numbers brought into Australia so that when an installer enters the number a check can be run to ensure it is on the list and not either duplicated or has been installed already in another state. Without this level of verification gathering this information is less than useful.

Register and test devices for emergency backstop: In the future, this function will be of use, but it cannot be implemented along with the rollout of the Emergency Backstop Mechanism for the reasons already explained.

It is also worth highlighting that it is most common for installers to not run the capability test of devices while on site, this is carried out by admin staff days after the install. One of the key reasons for this is that

there has to be enough sunlight for the minimum level of PV generation to be able to run the curtailment test. Most often it is the end of the day when installers complete the installation and have the system in commission phase and at that point, the PV generation is normally becoming very low.

Furthermore, most installers operating within a regional patch of NSW so often will only need to use the connection portal of one of the networks. It is very rare for an installer to need to be able to run the capability test of devices for all the NSW DNSPs, so this benefit does not align with the industry needs.

Amend and update records: In principle, this seems like a good idea, but the use case is not understood. Why would an installer need to do this? It implies that the installer in the first place will be able to upload incorrect information which can be adjusted at a later stage. If the installer is altering something on site, then there would need to be an approved application process via the DNSP so surely this would fall under a new record and not the amendment of an existing one. This use case is not clear, and the benefits not understood.

Provide CER data to the government and market bodies directly: This is just replacing the existing process already in place, the lodging of Certificates of Compliance of Electrical Works (CCEW) and system registration onto AEMO's Distributed Energy Resources Register. So, there is no new benefit or advantage for installers or the industry into replacing established industry functions.

Improving compliance with key standards: This sounds like a nice idea but what is meant by automated compliance and enforcement functionality? Other than using CSIP-AUS to verify that the correct grid code has been set, and the Emergency Backstop Mechanism is in place there is nothing that the portal has the ability to do to verify anything. In addition, seeing via CSIP-AUS that a grid code is in place is not true verification, this only comes from comparing network parameters to inverter behaviour via smart meter analysis which is not in this proposal. The verification of compliance with standards can only come from the inspection of systems as for the most part what has been physically installed needs to be verified and functional checks carried out by the inspector.

Further to this, what level of enforcement can ever come from the portal? This can only come via the electrical inspectors, so this function does not seem plausible to come from the Installer Portal.

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

No.

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

It is not clear how the portal will support installers at this stage. Currently, it appears to simply be trying to duplicate existing industry functions and processes that are already fit for purpose.

Question 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, but in reality, this is often impossible to enforce. This proposal implies that the 'retailer' of the system will somehow have the ability to force the installer to rectify an issue, which they do not. A very large proportion of retail companies use subcontractors for installations that are paid for the job. Once complete they offer very little in terms of ongoing support for the installation. Companies that employ their own installers have a different level of support and responsibility, but these are typically not the ones that cause the issues.

Question 18 – Do you have any other views on compliance and enforcement within the Portal?

The main view of SolarEdge is that the Portal is not the place to attempt to enforce compliance as it lies with the electrical inspection regime. Primary compliance issues are physical and not digital so the portal will be of no use.

Question 19 – Are there additional ways that the Portal should be designed to support installers?

No.

Question 20 – Do you agree with the phased approach proposed for the delivery of the Portal? If not, please explain why.

No, the proposal is completely the reverse of what should be implemented, although the actual functions of the portal in both phases are not clear in the proposal. It implies that phase 1 is to support the Emergency Backstop Mechanism and phase 2 is for all other installation connection requirements and the intention to help with compliance and enforcement, although this is not what the proposal explicitly states.

As has previously been stated, to implement the Emergency Backstop Mechanism as well as the Installer Portal at the same time is a very bad idea given the high level of risk of developing and launching two untested requirements at the same time.

It is impossible to test either the Emergency Backstop Mechanism or the Installer Portal prior to the go-live date as the full process cannot be replicated.

Introducing these two critical processes together will also make it very difficult to identify where a failure or breakdown in communication exists as there will now be four layers of interaction, the installer, the inverter, the portal and the DNSP.

SolarEdge proposes that the Emergency Backstop Mechanism integration into the Installer Portal be the 2nd phase of release. Phase 1 should be for the support of installation connection requirements and the intention to help with compliance and enforcement.

Ideally, the Portal should not align with the Emergency Backstop Mechanism introduction in spring 2025, it should be at least 6 months afterwards, once this function is working correctly.

Question 21 – Do you think that there are any functions that should be included or excluded from the first phase of the Portal development?

Yes, functions relating to the Emergency Backstop Mechanism.

Question 22 – Do you support the proposed joint NSW Government-DNSP delivery of the CER Installer Portal? If not, please explain why.

In principle yes, the proposed joint NSW Government-DNSP delivery of the CER Installer Portal is supported by SolarEdge. It is worth noting though that progress made by Endeavour Energy is untested within the context of the delivery of the Emergency Backstop Mechanism and there is a significant risk of assuming that this process is scalable and fit for the purposes intended without significant pre-testing and industry engagement, specifically from OEMs, installers and retailers.

Question 23 – What information will installers and any other stakeholders require to support the rollout of the CER Installer Portal?

Initially, installers will need to know the function and be fully trained on how to use the portal.

Secondly, and most importantly, installers will need to know who to contact and how to get support when there are issues with the portal. Given that installations centre 100% around the installation of the actual product, it is concerning that none of the consultation work by DCCEEW consultation included OEMs whose product is what is actually to be installed. Specifically in the context of Emergency Backstop Mechanisms as well as the concept around the portal's ability to capture critical information about CER devices or support the registration and testing devices for emergency backstop as well as the portals to improve compliance with key standards.

I. Who is best placed to provide this information?

OEMs

II. What are the best ways of communicating this information to stakeholders?

Given that all OEMs (specifically those with native inverter to utility server connectivity of CSIP-AUS) have unique registration and onboarding processes. They also have other unique processes such as serial number structures etc. This information can only come from the OEMs.

While we do understand the need for robust and reliable network connection requirements as well as the introduction of the Emergency Backstop Mechanism, we also believe there are some fundamental principles that should be adhered to in planning for and implementing new requirements and the reasonable timeline for a smooth transition.

Our overarching recommendations are:

1. Implement a staged rollout of the Emergency Backstop Mechanism, do not attempt to introduce it across the entire state at the same time. Follow the SAPN process instead of the Victorian one.
2. Introduce the Installer Portal after the full rollout of the Emergency Backstop Mechanism.
3. Stage 1 of the Installer Portal should be for the support of installation connection requirements and the intention to help with compliance and enforcement.
4. Stage 2 of the Installer Portal should be for the support of the Emergency Backstop Mechanism.

If you would like to have any further information or would like clarification to any of the points raised, please contact me directly to discuss.

Yours sincerely,

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SolarEdge Technologies (Australia) PTY LTD.

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Australia

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