

7 March 2025

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

Dear [REDACTED]

## **NSW Emergency Backstop Mechanism and Consumer Energy Resources Installer Portal**

The NSW Government Department of Climate Change, Energy, the Environment and Water (DCCEEW) shared a consultation paper inviting feedback on the proposed approach to implementing an Emergency Backstop Mechanism (EBM) and Consumer Energy Resources (CER) Installer Portal in NSW.<sup>1</sup>

Evoenergy owns and operates the electricity distribution network in the Australian Capital Territory (ACT), delivering almost 3,000 GWh to around 215,000 customers within the NSW National Electricity Market (NEM) region. Our geographical location within the NSW NEM region, together with supporting transmission services utilising our dual function assets, means that EBM triggers to respond to Minimum System Load (MSL) events will necessitate Evoenergy's active participation of energy management to operationalise.

Therefore, we welcome continued engagement and collaboration with the NSW Government, the ACT Government and NSW Distribution Network Service Providers (DNSPs) on building EBM capability in a coordinated manner by Spring 2025 as we ensure positive outcomes for our customers and industry to maintain network security and reliability. Given that the Australian Energy market Operator's (AEMO) EBM triggers will simultaneously impact NSW and ACT DNSPs, Evoenergy strongly supports aligning approaches between jurisdictions to minimise customer and industry impacts.

Relevant EBM capabilities to support a safe, reliable, and secure NSW NEM region may include generation management for non-scheduled solar photovoltaic (PV) systems, SCADA-controlled PV customers, and residential customers through Common Smart Inverter Profile (CSIP-AUS) standards, as well as emergency voltage management and reverse feeder shedding.

Evoenergy agrees with DCCEEW that high levels of compliance with CSIP-AUS standards are critical to maintain stability and reliability of the electricity grid during MSL events as residential solar uptake grows throughout the energy transition. Compliance with CSIP-AUS standards is an essential component of addressing EBM curtailment capability requirements for system security,

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<sup>1</sup> NSW Department of Climate Change, Energy, the Environment and Water, NSW Emergency Backstop Mechanism and Consumer Energy Resources Installer Portal, February 2025

balancing supply and demand through enabling flexible exports. The CSIP-AUS standards are critical for unlocking optimal rooftop solar generation in the ACT and support the ACT's net zero emission targets by 2045.

The CER Installer Portal is intended to improve network visibility for DNSPs and promote compliant installation of CER (predominantly through CSIP-AUS standards) to support EBM capability and enable an uplift in consumer energy generation. Evoenergy considers that the CER Installer Portal, and associated processes, should be aligned between NSW and ACT DNSPs to facilitate a seamless and consistent processes across the industry, minimising disruption to solar installers and electricity retailers.

Evoenergy supports a timeline that allows DNSPs to achieve the efficient deployment of CSIP-AUS standards, including for the development and testing of the CER Installer Portal that is essential for the success of delivering EBM capabilities while minimising industry impacts. Evoenergy considers that the current implementation timeline (spring 2025) for CSIP-AUS and the CER Installer Portal may result in industry disruption without sufficient time allocated for testing and industry training to effectively undertake CER commissioning and compliance verification using a linked utility server. Delayed integration of the CSIP-AUS component of EBM capability may be appropriate to facilitate effective implementation.

To maintain grid stability and reliability during MSL events, Evoenergy considers that the EBM could be supported with complementary measures to manage solar exports (such as solar curtailment, load increase, and voltage rise measures). Complementary measures should be designed to reduce network, generator and customer risks, and could be achieved through battery energy storage systems, utilisation of hot water systems, and electric vehicle charging.

Should you have any questions or wish to discuss our response, please contact [REDACTED]  
Future Networks Portfolio Lead at [REDACTED]

Yours sincerely

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