

## Formbay Consultation Response to the NSW Emergency Backstop Mechanism and Consumer Energy Resources Installer Portal

### Introduction

Formbay is the leading provider of digital workflow services for the solar industry in Australia, ensuring compliance, data accuracy, automation and validation. With extensive experience in managing and automating installer processes, Formbay welcomes the opportunity to contribute to the NSW Government's consultation on the Emergency Backstop Mechanism and Consumer Energy Resources (CER) Installer Portal.

We acknowledge the NSW Government's objective to enhance grid security while supporting the growth of distributed energy resources. However, effective implementation of these mechanisms must prioritize compliance, data integrity, and industry alignment.

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### 1. Harmonisation of DNSP Implementation of the Backstop Mechanism

Formbay supports the requirement for **NSW DNSPs to harmonise their implementation** of the backstop mechanism to ensure a streamlined process for installers and consumers. Inconsistent implementation across DNSPs could lead to compliance challenges, increased administrative burden, and reduced adoption of CER.

#### Recommendation:

- Implement **a single, standardised compliance protocol** across all DNSPs to improve efficiency and transparency.
- Align NSW's approach with national initiatives, such as the **Common Smart Inverter Profile - Australia (CSIP-AUS)** framework.

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### 2. Feasibility of the Scope and Timelines for the Emergency Backstop Mechanism

The proposed **Spring 2025 timeline** for implementation is ambitious, given the technical and operational changes required. While Formbay acknowledges the urgency, a rushed implementation of a new standalone system may compromise industry, NSW Government and other (eg Federal Schemes) objectives due to execution issues.

#### Recommendation:

- Leverage the experience within existing services
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### 3. Technical Implementation and Use of CSIP-AUS

Formbay supports the **CSIP-AUS framework** as a foundational standard for emergency backstop implementation. However, ensuring industry-wide compliance will require enforcement mechanisms and technical support.

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### 4. NSW CER Installer Portal – Compliance and Integration

The proposed **CER Installer Portal** is a crucial step toward ensuring installation compliance and data integrity. Formbay's experience in automating installer processes highlights the importance of **data accuracy and real-time validation** in such systems.

#### Recommendation:

- Leverage existing industry solutions and know-how to ensure the best results for installers, NSW Government and other stakeholders
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### 5. Compliance and Enforcement Framework

For the **Emergency Backstop Mechanism and CER Installer Portal to be effective**, compliance must be actively monitored and enforced.

#### Recommendation:

- Leverage existing industry validation providers and capabilities including Formbay
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### 6. Response to Consultation Questions

#### Question 1: Harmonisation of DNSP Implementation

**Response:** Yes, harmonisation across DNSPs is essential to ensure consistency, reduce complexity, and improve compliance. Formbay supports a **uniform implementation framework**.

#### Question 2: Feasibility of Scope and Timeline

**Response:** Formbay encourages the NSW Government to leverage, extend, integrate with or seek partnership with existing providers. Under NSW Governments direction and with

alignment, all of the capabilities and technical requirements described are achievable within the timeframe via extension of existing capabilities.

### **Question 3: Hierarchy of Measures to Increase Operational Load**

**Response:** NA

### **Question 4: Design Elements of the Backstop Mechanism**

**Response:** NA

### **Question 5: Roles and Responsibilities**

**Response:** NA

### **Question 6: Threshold for CSIP-AUS Compliance (200kW and smaller)**

**Response:** The 200kW threshold aligns with industry standards, but Formbay supports **gradual expansion** to larger systems in the future.

### **Question 7: Use of CSIP-AUS and Internet Connection**

**Response:** CSIP-AUS is the most viable approach; however, **fallback measures for internet connectivity issues** must be implemented.

### **Question 8: Future Use of Flexible Export Limits**

**Response:** Yes, aligning the backstop mechanism with **future flexible export capabilities** will provide long-term benefits.

### **Question 9: Existing Test Protocols for NSW Implementation**

**Response:** Formbay recommends using **standardised test protocols already in use in SA and Victoria** to ensure consistency.

### **Question 10: Conditions for Activating the Emergency Backstop Mechanism**

**Response:** NA

### **Question 11: Implementation Pathway via DNSP Licensing**

**Response:** NA

### **Question 12: Information Requirements for Stakeholders**

**Response:** Installers and manufacturers need **clear guidelines, training, and a testing sandbox** to ensure compliance before the rollout. Formbay provides on platform training for thousands of installers every year and recommends using existing channels like this to inform,

train and support customers rather than asking them to find and absorb information on new sources as this does not tend to work well.

## **Question 13: Technology Scope of the CER Installer Portal**

**Response:** The Portal should capture all **grid-connected CER under 200kW**, with future expansion based on industry needs.

## **Question 14: Support for Proposed Portal Functions**

**Response:** Formbay supports the outlined functions but **notes that many of these functions are covered already by or are just an extension of what Formbay provides for over 30% of all CER installations in NSW currently.**

## **Question 15: Additional Portal Functions**

**Response:** Integration with **national DER registers** and **automated compliance validation** should be included.

## **Question 16: Additional Portal Design Considerations**

**Response:** The Portal should be **mobile-friendly** and allow **batch uploads for large-scale installers.**

## **Question 17: Responsibility for Installer Compliance**

**Response:** Yes.

## **Question 18: Compliance and Enforcement**

**Response:** **Automated compliance checks and industry accreditation** should be implemented. Formbay can provide this service.

## **Question 19: Additional Portal Design Support for Installers**

**Response:** The Portal should offer **real-time support and installer training modules.** Formbay can provide this service.

## **Question 20: Phased Implementation of the Portal**

**Response:** A phased approach is necessary but must include **early testing opportunities** for installers.

## **Question 21: Functions for Initial Portal Phase**

**Response:** The initial phase should prioritise **compliance tracking and real-time validation.**

## **Question 22: Joint NSW Government-DNSP Portal Delivery**



**Response:** Collaboration is beneficial, but **independent oversight** should be included to ensure consistency.

#### **Question 23: Stakeholder Communication and Training**

**Response:** As above Formbay can support installers, retailers and contractors via dedicated on platform training as well as webinars, in concert with NSW Government.

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#### **Conclusion**

Formbay welcomes the NSW Government's initiatives to enhance grid stability and compliance in the renewable energy sector. To ensure the successful implementation of the Emergency Backstop Mechanism and CER Installer Portal, a **harmonised, data-driven, and compliance-focused approach** is essential.

We look forward to continued engagement and offer our expertise in validation and compliance to assist in the development of these critical mechanisms.

For further information please contact [REDACTED]

**Submitted by:** Formbay Pty Ltd

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