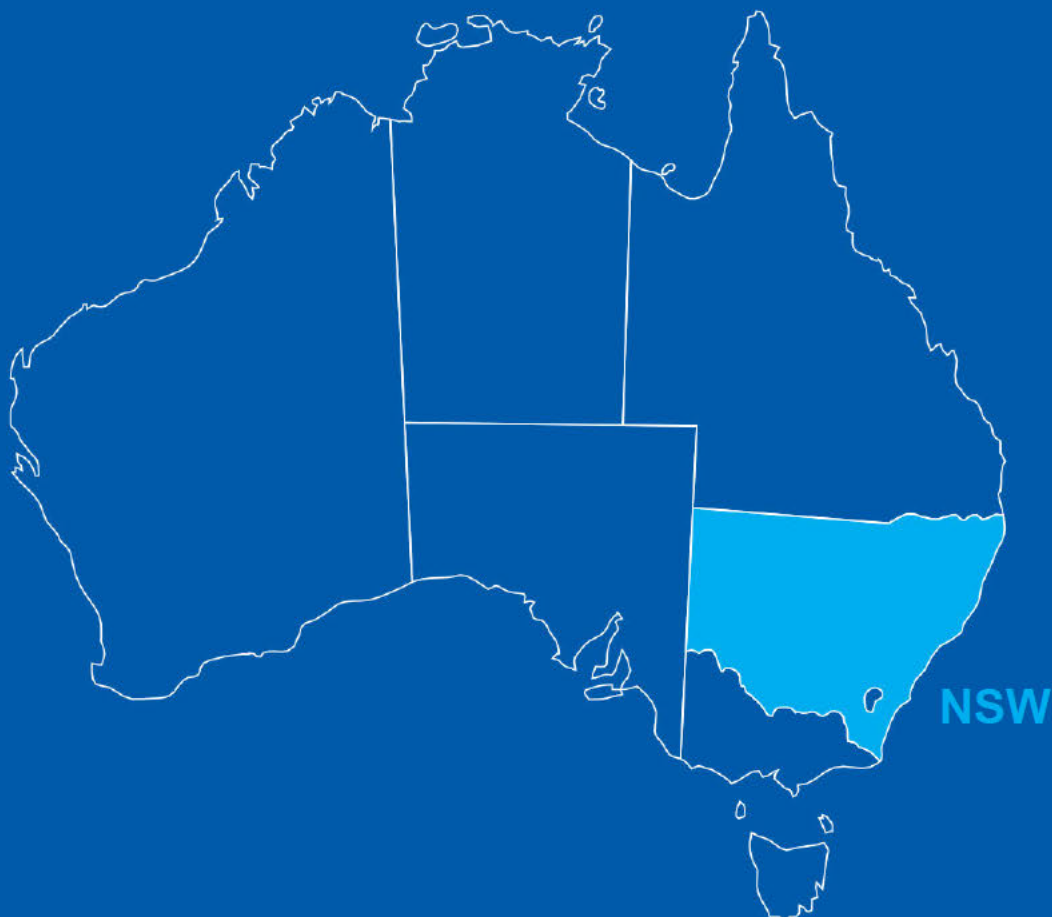


Submission

**Emergency Backstop Mechanism and
Consumer Energy Resources Installer
Portal – DEECCW Consultation Paper
March 2025**





INTRODUCTION

The National Electrical and Communications Association (NECA) is the peak body for Australia's electrical and communications sector, which employs 359,211 workers and turns over more than \$91bn annually.

NECA provide this submission in response to the consultation paper circulated by DEECCW seeking stakeholder input into the proposals for Emergency Backstop Mechanisms and Consumer Energy Resources Installer Portal.

NECA and its members are highly engaged in this space, particularly in the energy and electrotechnology sector and the design, installation and maintenance of Consumer Energy Resources.

The National Electrical and Communications Association (NECA) is the peak body for Australia's electrical and communications industry, which employs 344,370 people and turns over more than \$82bn annually. NECA represents over 6,500 businesses performing works including the design, installation, and maintenance of electrical and electronic equipment in the construction, mining, air conditioning, refrigeration, manufacturing, communications, and renewable energy sectors.

NECA has advocated on behalf of the electrotechnology industry for over 100 years and helps its members and its industry to operate in an efficient, safe, and regulatorily compliant manner. NECA represents the interests of electrical and communication businesses to all levels of government and in regulatory, legislative and industry development forums. It is also a foundation member of the Australian Chamber of Commerce and Industry (ACCI).

RESPONSES TO SPECIFIC QUESTIONS AND SUPPLEMENTARY COMMENTS

1. The Emergency Backstop Mechanism

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

Yes, NECA supports the requirement for NSW DNSP's to harmonise their implementation of the backstop mechanism.

Further, it should be harmonised as far as reasonably practical with AEMO requirements and other states.

Question 2. *Are the scope and timelines for the emergency backstop mechanism feasible? If not, please explain why.*

The efficient implementation of the emergency backstop provisions and otherwise general compliance of new/upgraded inverter connected CER will depend significantly on the development and communication of connection requirements from DNSP's to installers.

As the DNSP's implement their CSIP-AUS servers and the NSW CER Installer portal is established, the installer industries will require clear interface and commissioning instructions from the DNSP's.

NECA strongly recommends that the DEECCW and the NSW DNSP's communicate expected 'go-live' dates and changes to connection processes / inverter registration well in advance of spring 2025.

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

NECA's only suggestion with respect to the hierarchy is that programs to reduce the volume of non-CSIP-AUS enabled solar inverters over time should be considered, to improve the effectiveness and fairness of hierarchy step 2 and DNSP awareness of inputs onto their network.

2. Implementation of an Emergency Backstop Mechanism in NSW

a. Design elements and responsibilities

Question 4. *Are the design elements of the backstop mechanisms appropriate and feasible? If not, please identify why and provide any alternative suggestions.*

Yes

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

NECA suggests that the “responsible organisations” for design element 1 be expanded to include installation owners.

On the basis that the owner also has a duty to maintain an installation and the equipment withing it to the manufacturers requirements and in compliance with the DNSP customer connection contract.

b. System size

Question 6. *Do you support the threshold for backstop mechanism using CSIP-AUS being 200kW and smaller? If not, please provide detail on what threshold you think is appropriate.*

At this level, the vast majority of small-scale CER installations will be captured by the requirement to have emergency back-stop enabled by CSIP-AUS.

NECA considers this the adequacy of this threshold is better informed by the ability of the DNSP’s to maintain the stability and reliability of local supplies using CSIP-AUS.

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

NECA suggests again that consistency of approach between DNSP’s within NSW and in other jurisdictions be achieved as far as practical.

c. Technical considerations

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

Not specifically. As an advocate for installers rather than consumers, NECA simply wishes to ensure that installers are informed about approved devices/inverters and the correct commissioning processes.

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.*

NECA suggests that using the one technology/platform to enable both

functions is the most efficient outcome for all stakeholders.

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

NECA is neutral on this point, other than for the desire for a consistent protocol and for that information to be clear and embedded in DNSP connection requirements.

d. Conditions of use

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.*

NECA does not wish to comment on this aspect.

e. Implementation pathway

Question 11. *Do you have any views on the proposed implementation pathway (variation of DNSP licencing condititions)?*

NECA does not wish to comment on this aspect.

Question 12. *What information will manufacturers, installers, customers and distribution networks require to understand the changes to implement the backstop mechanism?*

Manufacturers will need to ensure that any inverter they sell into the NSW market is capable of meeting the CSIP-AUS requirements and is accompanied by information enabling installers to correctly set-up/configure the equipment.

Installers, require both the OEM information and criteria for commissioning new/upgraded inverters to DNSP requirements, and any information with respect to using the NSW CER Portal.

CER Consumers need information with respect to how their installation will/may be affected by emergency backstop provisions and/or future DOE functionality and the options available to register with VPP's and/or schedule exports and retail plans etc.

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

Installers can be both recipients and communicators of critical information.

In particular, the DNSP's are best placed to communicate the

conditions under which an inverter may be commissioned/ upgraded at an installation and the connection processes / data inputs that support it.

CER retailer / installers in many cases will be able to inform the consumer of the operation of the equipment, DNSP control & verification activity, and emergency backstop provisions as applicable. However, they must be supported with relevant information / fact sheets being readily available to themselves and the consumer.

DNSP's should retain a responsibility to publish information/advice for installers and customers connecting to their network.

- ii. *How should this information be best communicated to the different audiences?*

Consumers should have access to readily understandable fact sheets and information supported by DNSP information on DNSP and retailer websites.

Installers should receive sufficient information about CER requirements early in the connection application processes established by DNSP's.

3. The NSW CER Installer Portal

a. Technology the Portal will capture

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

In general terms, NECA would suggest that the CER portal only capture the devices interfacing with or controlling export capacity to the network, with other compliance, maintenance and energy management within an installation remaining outside of the remit of DNSP's or regulators not responsible for those assets.

b. The Portal will introduce features to improve CER installs

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

Yes

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

Nothing to suggest at this stage, but would support additional functions that support consumer flexibility and reliability of supply.

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

The portal should provide positive indication that the required configuration data has been received and verified with the device.

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.*

No, at the point of initial installation, the licensed party installing and configuring the device should be responsible for or 'warrant' the initial installation compliance. Any alterations initiated or commissioned by the installation owner or response to non-compliance notifications after a nominated period (nominally 6 months) should be the responsibility of the applicant/owner to engage appropriately qualified persons.

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

Not at this stage

c. The Portal is designed for installers

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

No suggestions to make at this stage

4. Implementation of the Portal in NSW

a. The CER Installer Portal will be available by Spring 2025

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

NECA sees this as a practical response to the problem of implementation. Ideally, installations made in phase 1 will be made with sufficient ability to update with phase 2 functionality with minimal/no return visits required by the original installer.

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

- Advice should be provided to installers and consumers about
- the additional functions relevant to the installation that will be involved in phase 2
 - how those additional functions will be applied
 - options available to the consumer (if any) about updated functionality

b. Stakeholder collaboration to deliver the Portal

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

Yes, in the anticipation that the installation of CER equipment will involve common processes across the three NSW DNSP's and ACT.

c. Keeping stakeholders informed

Question 23. *What information will installers and any other stakeholders require to support the roll out of the CER Installer Portal?*

i. Who is best placed to provide this information?

DNSP's to provide detailed information about the portal and connection processes in their connection application processes and supporting technical documentation.

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

As above

GENERAL COMMENTS

NECA are encouraged to see progress on enabling the capabilities of CER technologies and securing installation compliance of those technologies in the NSW jurisdiction. NECA recommends that DEECCW urgently consider programs to address the existing population of non-compliant and aged installations to bring them to a standard and functionality that secures greater safety and reliability of installations and networks.

To obtain NECA's further input or to clarify any part of this submission use my contact details below.

[REDACTED]
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To arrange a meeting or discuss this proposal further, please contact:

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