



Clean Energy Council submission to the SA Power Networks consultation paper on Inverter Connection Requirements, 200kW to 5MW

Executive Summary

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback on the SA Power Networks consultation paper on Simplified Inverter Connection Requirements for 200kW-5MW export inverter generating systems.

The CEC is the peak body for the clean energy industry in Australia. We represent and work with hundreds of leading businesses operating in solar, wind, hydro, bioenergy, marine and geothermal energy, energy storage and energy efficiency along with more than 5,000 solar installers. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

The CEC supports moves toward more dynamic management of customer energy resources on the distribution network. However, the consultation paper leaves many important questions unanswered. Those questions include the following:

- Will all systems be required to utilize a remote terminal unit (RTU) provided by SA Power Networks or will SA Power Networks assess devices to determine whether they meet the specified criteria?
- If SA Power Networks will assess the suitability of RTU devices, what will be the process and cost for the assessment?
- If SA Power Networks will be the sole supplier of the RTU, what will it cost?
- Will there be any regulatory oversight of the pricing for the proposed RTU?
- Does the Energy Networks Australia National Connection Guidelines include consideration of the SA Power Networks approach to SCADA and specification of standard interface requirements for an RTU?

We would be very happy to discuss these issues in further detail. We look forward to contributing further to this important area for policy development.

Publication of technical specifications is a welcome development

The CEC welcomes moves toward more dynamic management of customer energy resources on the distribution network. We welcome the publication of the technical specifications for a standardised solution using Modbus communication protocols more readily supported by typical customer equipment. Our remaining concerns relate to broader policy questions that do not appear to have been addressed in the consultation paper. The remainder of this submission outlines these broader concerns.

Will SA Power Networks be the sole supplier of an approved RTU?

The consultation paper states that, “A new SAPN remote terminal unit (RTU) that utilises simpler but still ‘fit for purpose’ functionality will be used for all inverter for installations of this size...” However, in earlier consultation with CEC members, SAPN had stated that, “The customer is able to select their own RTU/PLC/Controller to interact with our gateway provided it meets the specified interface requirements” and “The customer is free to select their own equipment provided it meets the interface requirements.” This raises the following question:

Will all systems be required to utilize a RTU provided by SA Power Networks or will SA Power Networks assess devices to determine whether they meet the specified criteria?

Process to assess an RTU

If SA Power Networks will assess the suitability of equipment to determine whether it meets the interface requirements, the following question arises:

What will be the process by which SA Power Networks will assess whether an RTU meets its interface requirements? Will there be a cost for the RTU assessment?

Cost of the SA Power Networks RTU

If SA Power Networks is proposing that it will be the sole supplier of an approved RTU, the following questions arise:

What will be the cost of the RTU approved by SA Power Networks?

Regulation of a monopoly service

Given that distribution network service provisions is a regulated monopoly service, if SA Power Networks requires the use of its own RTU at a price to be determined by SA Power Networks, and if that precludes competition to any RTU other than a single device selected by SA Power Networks then the question arises:

Will there be any regulatory oversight of the pricing for the proposed RTU?

Consistency with the National Connection Guidelines

The CEC has been working with Energy Networks Australia (ENA) over a period of several years with the aim of developing a set of National Connection Guidelines. It is unclear whether other distribution networks will adopt the SA Power Networks RTU or whether each distribution network will develop its own approach.

Does the ENA’s National Connection Guidelines include consideration of the SA Power Networks approach to SCADA and specification of standard interface requirements for an RTU?