



## **Clean Energy Council response to the SA Government Department for Energy and Mining proposed new requirements for DER in SA**

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback on the Government of South Australia (SA) Department for Energy and Mining proposed new requirements for distributed energy resources (DER) in SA.

The Clean Energy Council is the peak body for the clean energy industry in Australia. We represent and work with Australia's leading renewable energy and energy storage businesses, as well as rooftop solar installers, to further the development of clean energy in Australia. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

We have summarised our response in the form of a series of questions that have been raised by CEC members. We would be happy to discuss these issues in further detail with representatives of the SA Government.

## **Compliant technologies**

Will a static zero export limited inverter satisfy the requirement for remote disconnection and reconnection?

Will the Office of the Technical Regulator (OTR) publish a list of manufacturers and importers that have signed the enforceable undertaking and the makes and models of inverters that they have declared are compliant?

How will the requirement for a dual-element smart meter avoid effectively eliminating entire classes of products, such as hybrid systems?

Will there be a class exemption for three phase meters regarding the requirement for multi-element meters?

Will in some circumstances a battery storage system being requested to switch into charge mode rather than being turned off?

Do agents need to demonstrate their technical capability for remote disconnection and reconnection prior to 28 September or do they have until 31 December?

If an agent nominates their technology 28 September will they be allowed additional time (e.g. to 31 December) to investigate and demonstrate feasibility – given that solutions are unlikely to be completely ‘off the shelf’ products and will require some degree of system integration.

If a device (which is not a smart meter) is capable of measurement, disconnection and reconnection, will that be deemed compliant?

Agents are required to “provide information on their cyber security protocols and processes to the Technical Regulator from time to time”. What is considered adequate cyber security and what action will the OTR take if it considers cyber security measures to be inadequate?

Is physical disconnection required or is it sufficient to reduce PV output to zero?

## **Roles and responsibilities of agents**

### SA Power Networks

Will SA Power Networks be required to verify that all DER system owners have an ongoing agreement with an agent as a condition of grid connection approval?

Will SA Power Networks also be a registered agent?

SA Power Networks already requires remote response capability for PV systems larger than 200kW. Does that mean SA Power Networks will be the agent for those systems?

What service classification will be applied if SA Power Networks offers the capability to remotely disconnect and reconnect generation and load?

Will SA Power Networks be permitted to charge for the disconnect / reconnect service? If so, will this require approval by the Australian Energy Regulator (AER)?

If SA Power Networks provides the disconnect/ reconnect service free of charge, how are other agents expected to compete?

### Rules for agents

Will there be a ‘fit and proper person’ test for agents (or some other vetting procedure) to address the risk of unscrupulous operators taking advantage of the confusion caused by the new rules to defraud customers?

What compliance rate is expected from an agent? For example, would it be sufficient if 80% of inverters were disconnected in the required time or does it need to be 100%?

What is the penalty for the agent if a sufficient proportion of systems do not disconnect / reconnect or if they do not disconnect / reconnect in time?

How can companies be expected to sign up as agents and manage financial risks when the requirements on agents are not yet known?

When and how can a company terminate its services as an agent? Are there any penalties for agents that terminate their services?

What happens if a company acting as an agent becomes insolvent?

The draft states that the agent can “only” connect/reconnect when it has received a lawful direction. Is this intended to include allowing disconnection / reconnection when the customer has contracted to do so (e.g. as part of a future virtual power plant) and, if so, can the wording be clarified to ensure this is understood?

Will there be a list of assets and their corresponding agents to ensure that manufacturers have all their assets operating correctly?

#### Disconnect / reconnect requirements

The government has previously indicated that agents will be required to disconnect /reconnect within 15 minutes of receiving the message. To clarify, does this refer to receiving the message from SA Power Networks? Or 15 minutes from the time that AEMO issues an instruction to the transmission operator?

When directed to do so, will the agent be required to issue the disconnection command to:

- All inverters that they control on the SA Power Network grid?
- Selected inverters based on a total amount of generation capacity (intended to shed a fixed amount of total generation)?
- Selected inverters based on their location?
- Selected inverters based on something else?

#### Warranty issues

Will the OTR guidelines consider the implications of these new requirements for warranties?

Can product manufacturers specify or limit which agents are authorised to control their assets as unauthorised 3<sup>rd</sup> party control will often violate product warranties especially of a disconnect request is issued with a storage system that has batteries at 0% state of charge (SOC).

#### Scope

Will the disconnect / reconnect requirement apply to just normal grid connect inverters without batteries? Or also DC-coupled hybrid inverters? AC-coupled inverters with no solar? Any other specific type?

#### Communication of direction

How will the risk of loss of wi-fi connection be addressed?

How will the directions to disconnect / reconnect be issued to an agent?

Will the SA Power Networks be expected to develop an application programming interface (API) or will the system be based on phone calls and emails?

#### Verification and test procedures

What is the test procedure for remote disconnect and reconnect, and the pass/fail or performance criteria?

How is the test to be performed and documented? Will an accredited laboratory need to test the hardware solution in a simulated set-up? Or will testing of each installation need to be witnessed by OTR staff or electrical inspectors?

### Customer issues

Will the cost of the disconnect / reconnect service be borne entirely by the customer? Will there be any payment by the SA Government, the Australian Energy Market Operator (AEMO) or SA Power Networks?

Will written consent be required from every DER system owner? If they refuse, will they be refused grid connection approval?

What happens if a customer fails to appoint an agent or rescinds the agreement after the installation?

When a customer moves into a house with a solar or battery system already installed, will they be required to notify the OTR? If not, how can agents be expected to know when people move into a new house?

How will the OTR ensure that customers continue to maintain a relationship with their agent?

If an owner / operator does not pay an agent, what penalties will be applied to the customer and who will apply them?

How will the OTR ensure that customers do not inadvertently have multiple agents? For example, if a customer commissions an agent when their system is installed and then subsequently signs up for a VPP.

What sort of consumer education campaign is the SA Government planning?

Will the SA Government have a call centre responsible for answering enquiries from affected customers, installers and businesses?

What planned provision is there to ensure that agents do not lock in system owners or make it complicated and /or impose fees or charges to a customer to assign an alternative?

“Life of system” is not a practical reference point to explain the cost to customers. This should be set as the term of the contract with the agent, so that agents can offer a variety of periods (e.g. 1, 2, 5, 10 years etc). The important point is that this cost is disclosed up front to potential customers before they sign up for a new solar system. Can this be addressed in the final version?

### **Retailer issues**

How can solar / battery retailers know what they are able to sell over the next few weeks? Are South Australian solar / battery retailers expected to close their business while they wait for the OTR to publish guidelines?

### **Installation issues**

Will it be necessary for a metering provider to be present at every solar installation?