



Clean Energy Council response to the SA Government proposed deemed methodologies for remote disconnection and reconnection in SA

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback on the Government of South Australia (SA) Office of the Technical Regulator (OTR) proposed deemed methodologies for remote disconnection and reconnection 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 are very concerned that important decisions are being made with a consultation period of only two days. With such rapid decision making there is a risk that the government will make mistakes that it will regret.

We have several questions regarding disconnection versus zero export that we have raised in previous submissions. We have not received a response to those questions and we therefore repeat them in this submission.

We also seek clarification of the verification and test requirements.

Lastly, we note the doubtfulness of the SA government's estimate that remote disconnection and reconnection capability will involve an additional cost amounting to \$30 per customer.

We would be happy to discuss these issues in further detail with representatives of the SA Government.

Export limitation versus disconnection

In previous submissions to the SA Government we have sought clarification as to whether physical disconnection is required or if it will be sufficient to reduce PV output to zero. We have not yet received a response to that question and we therefore repeat it. Will it be sufficient to switch to zero export mode when required or are you expecting the PV system to disconnect completely?

We also seek clarification as to whether a customer who chooses to install a system with a static zero export limit will still be required to have a 'relevant agent' responsible for remote disconnection and reconnection, even though their system is, in effect, permanently disconnected?

A similar issue arises for AC-coupled storage systems, which are designed never export to the grid. Will a customer who purchases an AC-couple storage system that never exports to the grid still be required to have a 'relevant agent' responsible for remote disconnection and reconnection?

Verification and test procedures

As noted in a previous submission, we seek clarification of the test procedure for remote disconnect and reconnect, and the pass/fail or performance criteria.

We also seek OTR advice on how the test should 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? Does the OTR intend to publish another document that details the verification and testing requirements?

Cost to South Australian customers

In a submission provided to the SA Government on 10 July 2020, the CEC questioned the estimate that the proposed remote disconnection and reconnection requirements would involve an additional cost amounting to \$30 per customer. We said at the time that this is a gross underestimate. Nothing we have seen from the SA Government since that time has changed that view. Estimates of the likely additional costs vary and are expected to be hundreds of dollars per system.