



Clean Energy Council additional submission to the AEMC Consultation Paper: Review into Consumer Energy Resources Technical Standards

21 December 2022

The Clean Energy Council (CEC) welcomes the opportunity to provide additional feedback to the Australian Energy Market Commission (AEMC) Consultation Paper, *Review into Consumer Energy Resources Technical Standards*.

The CEC 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 accredited designers and installers of solar and battery systems, 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.

Ensuring that inverter installations comply with national and local standards is critical, particularly with regards to power quality settings, which have a role in supporting wider system security.

In our initial submission, we noted that delivering compliance was complex for a variety of reasons, including a lack of national consistency and a lack of clear responsibility for a single party, with multiple organisations having some role in inverter or connection compliance, making identification and rectification of non-compliance difficult.

The Clean Energy Council's Distributed Energy Leadership Forum (DELf) discussed technical standard compliance at its last meeting on 28 October 2022. One of the important drivers of compliance is believed to be the access to Small-scale Technology Certificates (STCs) issued by the Clean Energy Regulator to complying installations. The DELf was concerned that with the completion of the STC program there would be no "financial lever" to underpin the need for compliance. However, other members of the DELf indicated that STCs are already becoming less of a driver for installers and retailers as the number of available STCs per project reduces each year, and that if/as the compliance burden associated with STCs increases, installers will be less motivated by access to STCs, reducing the role the Small-scale Renewable Energy Scheme (SRES) can have in supporting compliance with standards.

If the SRES and STCs are no longer key drivers of compliance for installers and retailers, then installer and retailer accreditation processes, such as the current Clean Energy Council Accreditation Program¹, will be increasingly important in ensuring that inverters meet required standards. However, the Clean Energy Regulator is currently tendering for new accreditation providers² that may result in multiple accreditation providers, which the Clean Energy Council believes will be detrimental to good outcomes for both customers, installers and retailers.

¹ <https://www.cleanenergycouncil.org.au/industry/installers>

² [https://www.cleanenergyregulator.gov.au/RET/Pages/About%20the%20Renewable%20Energy%20Target/Small-scale-Renewable-Energy-Scheme-\(SRES\)-installer-and-designer-accreditation-scheme-application-round.aspx](https://www.cleanenergyregulator.gov.au/RET/Pages/About%20the%20Renewable%20Energy%20Target/Small-scale-Renewable-Energy-Scheme-(SRES)-installer-and-designer-accreditation-scheme-application-round.aspx)