

Thursday, 25 May 2023

Andrew Swanson
Australian Energy Market Commission
GPO Box 360
Melbourne VIC 3001

Reference: EMO0045

Sent via email: Andrew.Swanson@aemc.gov.au

Dear Andrew,

RE: Review Into Consumer Energy Resources Technical Standards

Standards Australia is pleased to provide a submission to the Australian Energy Market Commission's Review into consumer energy resources technical standards paper. We commend the Australian Energy Market Commission for undertaking this comprehensive review, which has provided valuable insights into the current state of technical standards in the energy sector.

Standards Australia fully recognises the importance of technical standards in promoting interoperability, safety, and efficiency within the energy sector. We believe that robust and effective standards are essential to support innovation, foster competition, and ensure the reliability and security of the energy system.

In response to the report, we would like to provide the following key points and recommendations:

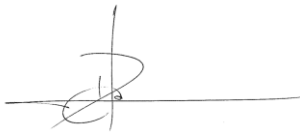
1. **Harmonisation and Consistency:** We agree with the report's observation regarding gaps and inconsistencies in existing technical standards across jurisdictions. We are pleased to inform you that both parts of the AS 4777 series are currently being updated. This revision aims to enhance harmonisation, streamline processes, and address technological advancements. The current AS 4777.2:2020 Standard amendment is not seeking to pursue Recommendation 2, as this is seen as too prescriptive to apply via a Standard given the international supply chains of inverter manufacturers. Regarding Recommendations 4,5 and 6 where CER technical standards are referenced (DER technical standards are currently defined as AS 4777.2:2020 in the NER) a broader definition needs to be used that incorporates other state-based regulatory and DNSP requirements for installation of CER e.g., AS 4777.1:2016, AS/NZS 3000:2018, AS/NZS 5033:2021 and AS/NZS 5139:2019.
2. **Consumer Perspective:** We concur with the report's emphasis on incorporating the consumer perspective in the development and review of technical standards. Standards Australia believes in the importance of consumer engagement and consultation to ensure that standards reflect their needs, preferences, and concerns. We encourage the Australian Energy Market Commission to continue promoting consumer involvement in standardisation processes.

3. **Future-Proofing Standards:** With the rapid evolution of technology, it is crucial to develop future-proof standards that can accommodate emerging technologies such as energy storage and electric vehicles. Standards Australia remains committed to proactively engaging with industry experts and other relevant bodies to ensure that standards remain relevant and adaptable over time.
4. **Coordination and Information Sharing:** The report highlights the need for improved coordination among stakeholders in the development and implementation of technical standards. Standards Australia supports the establishment of mechanisms and platforms that facilitate efficient information sharing and collaboration, enabling stakeholders to align their efforts and avoid duplicative work.
5. **Regulatory Support:** The report suggests that regulatory changes may be necessary to support innovation and competition within the energy sector. Standards Australia encourages the Australian Energy Market Commission to consider appropriate regulatory frameworks that foster a supportive environment for the development and adoption of technical standards while ensuring the necessary level of flexibility to accommodate evolving market dynamics.

In conclusion, Standards Australia appreciates the opportunity to provide our response to the "CER Technical Standards Review" draft report. We acknowledge the significance of technical standards in driving industry advancements and stand ready to collaborate with the Australian Energy Market Commission and other stakeholders to enhance the effectiveness, efficiency, and relevance of technical standards in the energy sector.

We look forward to further engagement and dialogue on this important matter. Should you require any additional information or clarification, please do not hesitate to contact Jon Meunier, Engagement Manager at jon.meunier@standards.org.au.

Yours sincerely

A handwritten signature in black ink, appearing to be 'AS', written over a horizontal line.

Adam Stingemore
General Manager Engagement & Communications
Standards Australia Limited