Friday, 7 March 2025

Department of Climate Change, Energy, the Environment and Water
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Submitted via www.energy.nsw.gov.au

Clean Energy Council Submission to NSW Emergency Backstop Mechanism and Consumer Energy Resources Installer Portal Consultation Paper

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback to the New South Wales (NSW) Department of Climate Change, Energy, the Environment and Water (DCCEEW) Consultation Paper, NSW Emergency Backstop Mechanism and Consumer Energy Resources Installer Portal.

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.

We support the NSW Government's *Consumer Energy Strategy* that sets out how the NSW Government will support households and small businesses across the state access the benefits of consumer energy resources (CER), like rooftop solar and household batteries, as well as energy efficient appliances. The CEC was highly engaged in consultation surrounding the *Consumer Energy Strategy* and welcomes the key actions around standards, compliance and minimum system demand, including the Emergency Backstop Mechanism (Action 43) and CER Installer Portal (Action 37 and 44).

In 2024, NSW became the second state to surpass one million total rooftop solar installations and boasts the highest level of total installed capacity of rooftop PV with 6.6 GW – over a quarter of the entire Australian capacity[1]. The CEC understands the need for a genuine last resort emergency backstop mechanism for possible future minimum demand events to ensure the reliability of the system. Last year, the CEC released *Powering*

[1] rooftop-solar-and-storage-report_jan-june-2024.pdf

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Homes, Empowering People: A National CER Roadmap[2], this detailed 16 recommendations at the Federal level, including "emergency backstop arrangements must be used a genuine last resort."

In the near future, a combination of storage, pricing and dynamic operating envelopes for rooftop solar will be the leading solutions to addressing minimum demand conditions. As a result, clearly defining an emergency backstop response with appropriate guard rails as to when it will be triggered is needed. This will better complement market-based solutions for managing minimum demand events and will be consistent with the arrangements already in place for distribution area load shedding during shortfalls of generation or transmission capacity. Further, clear definition of when emergency backstop arrangements will be used will allow customers to understand the extent to which their use of CER is likely to be interrupted, which will increase confidence and acceptance of those arrangements.

Key Principles for Emergency Backstop Implementation

In providing feedback to the Consultation Paper, we have used the following principles, which we believe will ensure consumers are encouraged to continue to take up rooftop solar and storage solutions to lower their energy bills and be rewarded for their active participation in supporting wider system needs, while managing the system at least cost with respect to possible minimum demand events:

- ***National consistency***: As Australia is a relatively small market, national consistency is a key criterion in keeping industry implementation and on-going management costs as low as possible.

- ***Interoperability***: This should be a core driver to ensure consumers can switch service providers without any constraints or additional costs.

- ***Consumer Empowerment***: Industry should be encouraged to innovate and drive service improvements based on consumer preferences on how they would like to use their rooftop solar and storage assets, as well as ensuring consumers are rewarded to use their energy as flexibly as possible, and industry only take control of CER as a genuine last resort emergency situation.

Based on these principles, CEC generally supports the premise of the Consultation Paper. Specifically, we support the requirement for NSW Distribution Network Service Providers (DNSPs) to set up and operate emergency backstop through Common Smart Inverter Profile – Australia (CSIP-Aus) and use a consistent NSW test protocol across all servers. It is recommended the NSW Government explicitly define how they intend to require DNSPs to harmonise their approach. Feedback on the Victorian backstop mechanism has highlighted a lack of specific mechanism to enforce consistency, this could be done either through license obligations or another pathway developed in consultation with industry.

We highlight the importance of harmonisation with other jurisdictions that have implemented the backstop mechanism, many of our members have adopted and are familiar with this protocol as a result of preparing for the commencement of the backstop mechanism in Victoria and South Australia. Alignment will assist with minimising implementation costs as well as reduce barriers to meeting the Spring 2025 proposed implementation date. We encourage the NSW Government to work closely with Original Equipment Manufacturers (OEMs) over the intention to require a harmonised approach in the use of utility servers and establish a change management plan for the implementation of the backstop mechanism.

[2] Powering-Homes-Empowering-People-CER-Roadmap.pdf

Additionally, the CEC is a member of the Smart Connect Working Group, this seeks to align stakeholders to establish a consistent national framework for the Emergency Backstop Mechanism, We are supportive of the Smart Connect work program to support NSW's backstop implementation and establish this jurisdiction as the lead state in the development of a national framework for Emergency Backstop Mechanism.

Prioritising Industry Collaboration

The CEC has previously been involved in facilitating industry collaboration prior to the implementation of the Victorian Emergency Backstop, establishing industry workshops to bring together DNSPs, OEMs and the Victorian Department. It is recommended the NSW Government seeks to establish ongoing forums with key stakeholders, including CER retailers and installers to best prepare for implementation and ensure knowledge-sharing and transparent communication can occur as soon as possible. The development of an Emergency Backstop Stakeholder Reference Group will ensure industry voices are well represented pre and post implementation and allow any arising issues to be quickly identified and resolved.

We encourage the NSW Government to establish an additional Working Group of DNSPs, OEMs, industry bodies, retailers, installers and departmental representatives to ensure all stakeholder perspectives are included in the change management process. The Working Group should be charged with the type of communication; and the communication channels to provide the information by each industry participant. This will ensure communication provision to consumers is co-ordinated and everyone is using the same language. The NSW Government can stand such a Working Group as it works through finalising the backstop mechanism so the communication program can commence following the final framework announcement.

Finally, we recommend that the NSW Government build in a trigger to review the emergency backstop arrangements. The review should aim to be completed after the first three years of implementation and will allow the NSW Government to assess the appropriateness of the arrangement, especially as the CER market and associated services is rapidly developing and scaling. This will ensure any emergency backstop arrangements keeps pace with market developments post 2028.

The remainder of the submission provides specific comments on the questions in the Consultation Paper.

If you have any queries or would like to discuss the submission in more detail, please contact Maxime Di Petta (mdipetta@cleanenergycouncil.org.au).

Kind regards,

Con Hristodoulidis
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Clean Energy Council

Consultation Questions

Question 1 - Do you support the requirement for NSW DNSPs to harmonise their implementation of the backstop mechanism? If not, please explain why.

As outlined above, the CEC strongly supports the requirement for NSW DNSPs to harmonise their implementation of the backstop mechanism. However, it is recommended that further clarification is provided regarding the definition of harmonisation for the implementation process. This could entail the specification that the DNSPs establish one consistent set of requirements, which they can use to tender for service providers. This will ensure, regardless of the service provider, there will be consistency in establishing technical requirements through a common set of requirements. We also recommend that NSW DNSPs work with OEMs to co-design the common set of requirements. As OEMs are currently familiar with the development and implementation work from these servers, this will reduce the need for additional accreditation and test obligations when implementing the NSW backstop mechanism.

Additionally, the CEC thinks it is critical that the NSW Government and DNSPs harmonise on the following:

- The NSW Government and DNSPs, with the Australian Energy Market Operator (AEMO), will agree on an exact definition of emergency backstop services.
- Based on this agreement, all NSW DNSPs, with AEMO, will agree on a single set of commands used to deliver these emergency backstop services.
- All utility server platform providers will be required to build their platforms to the exact same specification, with consistent tests required across all platforms.

The CEC also recommends not recreating the wheel. Rather than developing a new specification, it would make sense to use an existing one. The preference of OEMs is to use the SA Power Networks "Dynamic Exports Test Procedure" available at Dynamic Exports Test Procedure

This is the most advanced and tested of all existing test procedures. It includes commands for both emergency backstop and for flexible exports more generally, making it more future proofed in NSW, as it can be used initially for emergency backstops across all DNSPs, while also then being used for flexible exports for those DNSPs that wish to provide those services.

Question 2 - Are the scope and timelines for the Emergency Backstop Mechanism feasible? If not, please explain why.

Based on learnings from previous implementation timelines of the backstop mechanism, the current timeline is going to create substantial pressure on industry.

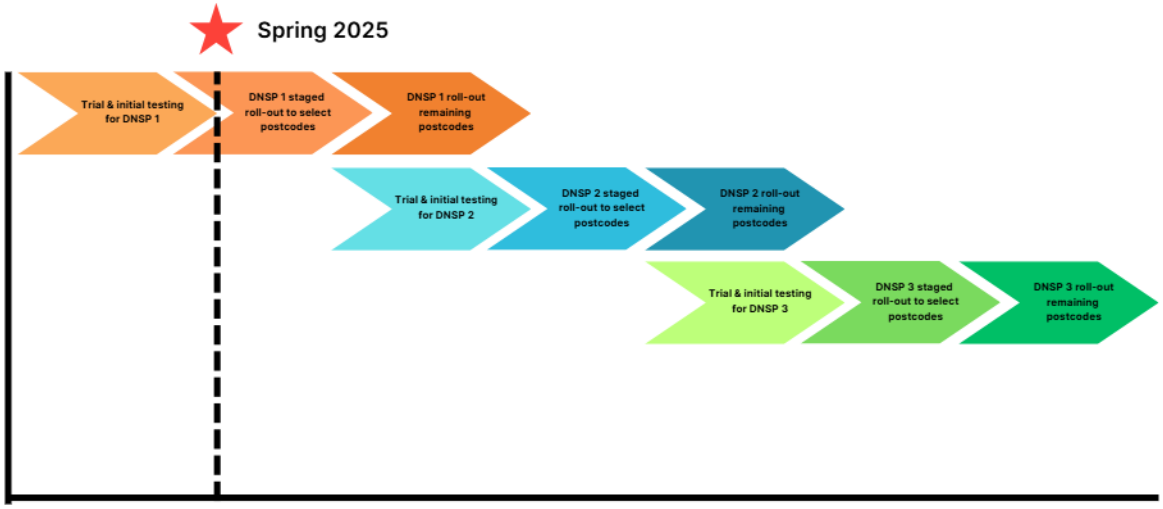
The emergency backstop mechanism is a nationwide solution to minimum system load and there is significant action occurring in other states that will create resourcing pressures for industry. As of March 2025, there are ongoing support requirements in South Australia, high priority implementation issues in Victoria and the consideration to introduce CSIP-Aus in Western Australia, all requiring industry attention and resourcing. This indicates there are several external considerations faced by industry when required to develop the NSW backstop mechanism that may severely and negatively impact the capability of industry to meet the Spring 2025 implementation date.

A key issue arising from the Victorian backstop mechanism was the speed of the rollout compared to South Australia. Victoria saw the implementation of the same communication and control mechanism occurring concurrently across three utility servers, with divergent interpretation and requirements of CSIP-Aus. The process saw numerous server outages and ongoing requests from installers, creating support issues for both OEMs and DNSPs while trying to set up servers. As issues can arise from backend applications that tie into the CSIP-AUS servers and the wide scope of functions within IEEE 2023.5 that are allowed, time may be needed to smooth out these issues after the implementation date.

The CEC recommends a phased rollout in NSW, comparable to South Australia that would see an initial trial, commencing with one NSW DNSP introducing the requirement across a select zone (e.g. set of postcodes). As we build confidence in the process this can be expanded to the entire region for that DNSP with an eventual expansion across the other DNSPs and the entire state. The initial trial could keep the existing timeline of Spring 2025 with select zones rolled out by the conclusion of 2025. The development of an achievable timeline for rollout across the entire state, could see the NSW Government consult with an Emergency Backstop Reference Group, once the trial and staged roll-out have been implemented.

Additionally, the NSW Government should consider the introduction of an incentive for NSW DNSPs to comply to the scope and timelines of emergency backstop implementation. Currently, there are no outlined requirements surrounding ability to meet set service level agreements or accept additional CER, however when system failure occurs, there are significant costs for OEMs and CER providers. The establishment of an incentive to comply will create consistency, reduce the risk of additional costs for industry and encourage improved pathways for resolution when system failure occurs.

Example phased roll-out of NSW Emergency Backstop Mechanism



Question 3 – Do you agree with the order of the hierarchy of measures to increase load in the grid during MSL events? If not, please explain why.

The CEC is supportive of the AEMO framework of actions as outlined in *Operating Electricity Grids with High Rooftop Solar* and explicit indication that rooftop solar management is a last resort action, only to be used when other options are exhausted[3].

The first two actions in the hierarchy of measures to increase operational load, hot water load shifting and solar export curtailment, are the most important support in minimum system load events as they can be enacted with minimal disruption to consumers. The prioritisation of hot water load shifting capacity and flexible exports roll out in NSW will reduce the likelihood that additional measures will need to be introduced in minimum system load events.

The expansion of the NSW Peak Demand Reduction Scheme (PDRS) to include battery energy storage systems and the introduction of additional incentives for consumers participating in demand response services will create additional support against minimum system load events. The CEC encourages the NSW Government to extend these programs to support the creating of flexible energy and reduce the likelihood the hierarchy of measures will go beyond increased operational load.

We recommend increased clarity around "solar disconnection: preventing solar systems from generating electricity" to explicitly state the inverter will not be turned off to comply with this action. This allows consumers to continue to charge home battery systems during minimum system load events, providing additional revenue for the customer (if participating in a Virtual Power Power) and system support.

While "emergency voltage management" may be required measure to manage the existing amount of systems and inverters that do not operate under the Emergency Backstop Mechanism, impacts to consumers should be considered. Emergency voltage management has the potential to adversely impact consumers that own rooftop solar as they are no longer able to self-generate from their assets and purchase energy at an increased prices during these events.

There are a number of inverters with existing CSIP-Aus capabilities that have the potential to become part of the backstop fleet through collaboration with DNSPs, OEMs and AEMO. It is recommended that the NSW Government consider an additional roll-out of these inverters once the initial roll-out has been completed, to reduce the customer impact from solar disconnection and emergency voltage management. The enrolment of these systems should be considered a market service and therefore reward the service providers that innovate and find consumer-friendly solutions to support AEMO to operate the market effectively, and reduce the likelihood of emergency voltage management taking place.

Question 4 – Are the design elements of the Emergency Backstop Mechanism appropriate and feasible? If not, please identify why and provide any alternative suggestions.

See below table.

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[3] V03 - Fact Sheet: Operating electricity grids with high rooftop solar

Question 5 – Are the roles and responsibilities of each organisation appropriate and feasible? If not, please identify why and provide any alternative suggestions.

Design Element	**Comments**
Device Functionality	The responsibility of rectifying non-conformance needs to be clearly defined with appropriate pathways for each responsible organisation. The Victorian roll-out of emergency backstop has highlighted issues in identifying the source of an issue within the process. • This indicates the likelihood that rectification of non-conformance may be the responsibility of several parties (e.g. DNSP, installer, OEM, NSW installer portal). • Clear communication should be established between all parties to identify and resolve non-conformance issues, highlighting the need for an Emergency Backstop Reference Group run by the NSW Government.
Communication Protocol	The requirements of this design are feasible, however communication between DNSPs and OEMs will be essential for testing and status validation, hence they should be listed as a responsible organisation.
Communication Network	Installers are a responsible organisation in this element as they configure the installation and means of communication. OEMs will also have responsibility in this element as they set the communication mechanism.
Management Systems	The design element and responsible organisations are appropriate.
Customer Connection Agreement	The design element and responsible organisations are appropriate.

Question 6 - Do you support the threshold for the Emergency Backstop Mechanism using CSIP-AUS being 200kW and smaller? If not, please provide detail on what threshold you think is appropriate.

This threshold is consistent with other NEM jurisdictions that have implemented the Emergency Backstop Mechanism for small and medium solar systems and is supported by the CEC.

I. Do you agree with the approach for systems above 200kW? If not, please explain why and provide any alternative suggestions.

This approach is supported by the CEC.

Question 7 - Do you have any concerns or insights into using CSIP-AUS compatible inverters and an internet connection to control the backstop mechanism?

The use of CSIP-Aus compatible inverters and internet connection to control the backstop mechanism is strongly supported by the CEC. With the exception of Queensland, all states have chosen to introduce a remote signal for constraining solar export, with the underlying communications framework being CSIP-Aus. If NSW follows this approach, it provides the best opportunity for national consistency in implementation of the Emergency Backstop Mechanism.

Question 8 – Is it appropriate for the Emergency Backstop Mechanism to be implemented using technologies and systems consistent with enabling the future use of flexible export limits? If not, please explain why.

The use of technologies and systems consistent with enabling the future use of flexible export limits has already been demonstrated in South Australia and is considered appropriate by the CEC.

Question 9 – Which, if any, existing test protocols should be considered for implementation as the consistent test protocol for NSW?

As there is no current consistent testing protocol, due to the divergent utility servers in other jurisdictions, a key priority for testing protocols in NSW is ensuring consistency across all three DNSPs (and ACT if possible). This could be achieved through communication amongst NSW DNSPs to all replicate, to the best of their ability, one of the existing protocols and utility server configurations. This should also set us on the pathway for a nationally consistent test protocol and we propose the NSW Department work with Smart Connect to achieve this outcome.

Question 10 – Do you think the conditions under which the Emergency Backstop Mechanism could be used are appropriate? If not, why? Please suggest any alternative conditions that should be considered.

The CEC is supportive of the conditions outlined under which the Emergency Backstop Mechanism could be used. It is recommended the NSW Government clearly define an emergency backstop response with appropriate guard rails as to when it will be triggered, including an upper threshold of permitted usage (e.g. no more than 2-2.5% of the year). This will better complement market-based solutions for managing minimum demand events and will be consistent with the arrangements already in place for distribution area load shedding during shortfalls of generation or transmission capacity. Further, clear definition of when emergency backstop arrangements will be used will allow customers to understand the extent to which their use of CER is likely to be interrupted, which will increase confidence and acceptance of those arrangements.

Question 11 – Do you have any views on the proposed implementation pathway (variation of DNSP licencing conditions) or alternatives?

The implementation pathway could be strengthened with the inclusion for DNSPs to:

- Establish a communication network with other NSW DNSPs, OEMs and installers prior to implementation of the Emergency Backstop Mechanism to ensure transparent communication and knowledge sharing.
- Report on compliance and capacity of CSIP-Aus compliant systems to the NSW Government and Emergency Backstop Stakeholder Reference Group (see proposed reporting template below, modelled off the Victorian Emergency Backstop Mechanism approach).

Sample Reporting Framework – weekly and cumulative

- Number of sites that do not require backstop capability (Pre Spring 2025)
- Number of sites that are backstop exempt (due to no internet) – customer's export set at 0kW.
    - % of exempted sites with correct low static export limit applied
- Number of sites requiring backstop
    - Registration
        - Number of sites – registration in progress
        - Number of sites – registration successful
        - Number of sites – registration unsuccessful
- Capability Testing
    - Number of sites where testing successful
    - % of sites that required multiple tests before being successful
    - Median number of tests taken before successful, as well as plot graph of number of tests taken before successful
    - Medium total testing time taken before successful, as well as plot graph of total testing time taken before successful
    - % of sites where multiple tests required before success is due to (a) testing system issues, (b) installation issues
    - Common installers or OEMs that are experiencing multiple testing / long total testing times before success
        - Number of sites where testing unsuccessful
    - Median number of failed tests undertaken at each site
    - Median total testing time taken at each site
    - % of sites where unsuccessful testing is due to (a) testing system issues, (b) installation issues
    - Common installers or OEMs experiencing unsuccessful testing
        - Number of sites whose tests are yet to be initiated by the installers
    - Number of active sites that are successfully registered and passed all capability tests –
        - This should be the total number, as well as total MW capacity of backstop-enabled systems installed in your distribution network that will respond to a curtailment command
    - Number of complaints relating to backstop issues – as well as any comments on common themes

Question 12 – What information will manufacturers, installers, customers and distribution networks require to implement the Emergency Backstop Mechanism? Who is best placed to communicate this information to the different audiences? II. How should this information be best communicated to the different audiences?

Installers will need to know what components they can quote, what additional equipment is required and how to install and how to comply with DNSP commissioning requirements and configuration requirements, including establishing connectivity between the device and the DNSP's server.

The NSW Government will be best placed to communicate this information, the CEC recommends the development of a free course for installers as was offered by the Victorian Government prior to the implementation date. DNSPs and OEMs should also be involved in the process to communicate via webinar or their websites implementation and commissioning requirements for different regions and inverter types. Documentation and training will need to be provided by the manufacturers.

Consumers will need to understand what the Emergency Backstop Mechanism is, why it is required and the impact of an emergency backstop trigger on their ability to self-consume, export or import. Consumers will also need information on the importance of maintaining connectivity and whether there is any ability to 'opt out' and what that means.

Information around Emergency Backstop Mechanism and requirements should be communicated by the NSW Government on their website, with the option of a webinar or online meeting. The impact on the customer's system, ability to export and frequency of use should be communicated by the installer, both prior to installation and on the day. The development of a one-page information sheet by the NSW Government detailing "What does Emergency Backstop mean for you?" could be produced as material for retailers and installers to share with consumers.

Manufacturers will need to understand what is required to establish the development work for inverters to allow communication with the utility servers and establish the function connection. This will also include information on onboarding and service requirements for the mechanism.

This implementation timeline and general requirements should be communicated to manufacturers by the NSW Government while NSW DNSPs need to communicate their individual development and implementation requirements. The establishment of an Emergency Backstop Workshop between the DNSPs, NSW Government and OEMs will allow fast-tracked communication on the overarching requirements from each stakeholder. The development of a file-sharing platform, as implemented in Victoria, will allow for better access to published documentation from the NSW Government and DNSPs.

DNSPs will require information on what devices are being connected and the associated installers, this will include ongoing telemetry data for planning and reporting to the NSW Government and AEMO. These requirements should be communicated to DNSPs through regular online forums or meetings with the NSW Government and AEMO.

Question 13 – What CER should the Portal capture? Please explain the reasoning behind your answers.

I. What types of technology?

The technology types should replicate those captured on the AEMO Distributed Energy Resources (DER) Register.

II. What size (capacity) of technology?

To align with other jurisdictions, system sizes less than 200kW should be included.

III. What technology should be excluded? Why?

The CEC recommends a phased roll out of the Portal, initially excluding systems required to operate an Emergency Backstop Mechanism. This will prevent the risk of the development and launch of two additional requirements for installers at the same time.

Learnings from previous rollouts highlight the risk of unforeseen issues occurring shortly after the mechanism goes live, as seen in Victoria and even in South Australia, despite the phased implementation. The implementation of two significant processes concurrently may cause difficulties in identifying failures or communication issues as there will be an additional layer of interaction. Hence, the CEC encourages that the Emergency Backstop Mechanism and Installer Portal both launch with phased implementations that reduces the complexity of new requirements for industry. Once the Emergency Backstop Mechanism has been successfully implemented across all NSW DNSPs, these systems can then be integrating with the Installer Portal.

IV. Should the Portal align with the Emergency Backstop Mechanism in capturing only systems under 200kW?

See above.

V. Should the Portal capture technology consistent with that recorded in AEMO's DER register? Is there additional technology that should be captured?

See above.

Question 14 – Do you support the functions outlined for inclusion in the CER Installer Portal? If not, please explain why.

Function	**Comments**
Integrate with DNSP connection portals	It is recommended there be consultation with installers around the likelihood they will be lodging applications for all of NSW, rather than one specific region. This will highlight if the application of this function will benefit a high percentage of installers and reduce duplication of information.
Capture critical information about CER devices	The CEC is supportive of this function, yet a key consideration in the capturing of serial numbers of devices is the ability to verify if the information has been entered correctly.

	The verification of serial numbers would be a significant project to implement, hence it is recommended the NSW Government consult with installers and OEMs about the feasibility of this function.
Register and test devices for emergency backstop	Refer to comments about regarding a phased implementation of the Installer Portal. It is also recommended the NSW Government consult with installers over the likelihood that capability testing of devices occurs on site, this will highlight if the application of this function will benefit a high percentage of installers.
Amend and update records	This function is supported by the CEC.
Provide CER data to the government and market bodies directly	This function is supported by the CEC.
Improving compliance with key standards	The use case for how compliance with key standards will be verified needs to be demonstrated. The Installer Portal is only effective if it can verify information is not false. It is also currently unclear how this will be linked to levels of enforcement in cases of non-compliance as the inspection of systems needs to be undertaken physically.

Question 15 – Are there any additional functions you would like to see included within a CER Installer Portal?

The current features outlined are sufficient for the initial launch of the Installer Portal.

Question 16 – Are there additional ways that the Portal should be designed to support installers?

Annual reviews with key stakeholders will best highlight the opportunity to introduce new functions that could support installers. This frequency of review will ensure the Installer Portal is able to adapt to changing industry services and products.

Question 17 – Do you agree that the party that applies for a CER connection should be responsible for ensuring the installers they have engaged rectify non-compliance? If not, please explain why.

The CEC supports this pathway, however there may be difficulties to enforce this action for CER providers with a high number of subcontracted installers. Higher penetration of the New Energy Tech Consumer Code, a

voluntary industry code providing better consumer protection and support following the installation[4], in NSW will ensure non-compliance is rectified faster with reduced disruption to the consumer. The CEC recommends the NSW Government explore opportunities to increase NETCC signatories in NSW to ensure a higher level of protection is granted to consumers.

Question 18 – Do you have any other views on compliance and enforcement within the Portal?

The NSW Government needs to ensure that the Installer Portal is complimented with a robust electrical inspection scheme that rapidly rectifies non-compliance. This will provide the best outcomes for customers and establish trust in the industry.

Question 19 – Are there additional ways that the Portal should be designed to support installers?

See above comments (Question 16) relating to annual reviews of the functions and benefits of the Installer Portal.

Additionally, the Installer Portal needs to allow for system failure, in the case that the DNSP system is down installers should still be able to commission systems that can be turned on an run as usual until the system issue is resolved and CSIP-Aus can be enabled remotely.

Reduction of administrative burden is a key priority in the introduction of an Installer Portal and the success of the system will be reflective of how simple, clear and effective the installer experience is. It is critical to avoid duplicative information over multiple systems, such as the DNSP Portal, the DER Register, the Installer Portal and Small-scale Technology Certificate Reporting. The CEC recommends the NSW Government include a clear metric for the portal that it should add no more than five minutes to a typical CER installation.

Question 20 – Do you agree with the phased approach proposed for the delivery of the Portal? If not, please explain why.

See above comments (Question 13) regarding the CEC's preferred phased approach of the Installer Portal. This would see Phase 1 support installation connection requirements to assist compliance and enforcement and Phase 2 support integration of the Emergency Backstop Mechanism.

Question 21 – Do you think that there are any functions that should be included or excluded from the first phase of the Portal development?

See above comments (Question 20).

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[4] NETCC | Consumer protection standards for solar, batteries & more

Question 22 – Do you support the proposed joint NSW Government-DNSP delivery of the CER Installer Portal? If not, please explain why.

The CEC is supportive of proposed joint NSW Government-DNSP delivery of the CER Installer Portal and highlights the importance of additional industry engagement with OEMs, installers and retailers to ensure industry perspectives are well-represented in the design.

Question 23 – What information will installers and any other stakeholders require to support the roll out of the CER Installer Portal? I. Who is best placed to provide this information? II. What are the best ways of communicating this information to stakeholders?

The CEC recommends the NSW Government develops a change management plan regarding the implementation of the Installer Portal and investment in education and training programs for installers on the use and benefits of the portal.

A resolution pathway should be developed when issues arise in the portal that provides installers with adequate support and information. The resolution pathway should clearly outline the roles and responsibilities of various parties in supporting the resolution when there is a failure.

Summary of Recommendations

The CEC highlights key recommendations for the NSW Government to consider in this consultation:

I. Implement a change management program for the Emergency Backstop Mechanism implementation, utilise a diverse stakeholder working group to harmonise communication and messaging.
II. Harmonise the Emergency Backstop Mechanism through collaboration of NSW DNSPs and OEMs to co-design the common set of requirements. As OEMs are currently familiar with the development and implementation work from these servers, this will reduce the need for additional accreditation and test obligations when implementing the NSW backstop mechanism.
III. Implement a staged approach to the rollout of the Emergency Backstop Mechanism and Installer Portal.

The Clean Energy Council is interested in ongoing consultation around the development of the NSW Emergency Backstop Mechanism and Installer Portal and would welcome the opportunity to engage industry in additional workshops with the NSW Government.