

To whom it may concern,

Redback Technologies welcomes the opportunity to provide feedback on the Government of South Australia (SA) Department for Energy and Mining consultation on the proposed export limit requirements for solar generating plants in SA.

Redback Technologies is an Australian company providing hybrid solar and battery solutions into the residential and commercial markets in Australia. Redback Technologies is an active VPP provider with an ongoing trial with Energy Australia and also produces the Luceo platform, a Low Voltage Network data and analytics platform in use by DNSPs such as Energy Queensland. Redback is based in Brisbane, employs many engineers and 80% of Redback staff reside in Australia.

Redback Technologies supports the South Australian government's efforts to guarantee network stability through the use of dynamic export control of DER. Redback's inverter products support this capability today and the Luceo DERMS platform enables the export control of connected DERMS units.

However, there are a number of issues that Redback Technologies sees with the proposed approach.

1. The timeframe is too aggressive to have a proper standard in place, and "deemed to comply" may well result in either:
 - a. a non-homogeneous set of solutions that are impossible to manage in practice and so are never used, much like the Australia only DRM standard,
 - b. with the government picking winners arbitrarily based on whatever works best with their systems. The SA government has a history of picking winners in this space (e.g. Tesla VPP), and this comes at a cost to the Australian industry, and ecosystem competitiveness as a whole.
2. There is an existing effort being implemented by SAPN to provide this functionality using a well known standard (2030.5). Consider fast-tracking this, rather than implementing something else.

Regards,

Paul Liddell

Paul Liddell CTO

e paul@redbacktech.com

w www.redbacktech.com

p 1300 240 182

m 0421 514 579



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