

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 low voltage ride-through requirements for inverters 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 changing the test procedure for low voltage ride-through characteristics of inverters. However Redback Sees the following Issues:

1. The implementation timeframe is too short. Even if required changes can be made in time, re-testing and re-certifying will likely take until beyond September. The end of the calendar year would be a more acceptable timeframe.
2. No manufacturer that currently has non-compliant products will wish to be locked out of the SA market. Forcing manufacturers to rush to make firmware updates to hit an aggressive date is a risky strategy for the network. No standards based test can test for long-term stability of inverter firmware, and time pressure can result in poor choices at the engineering level. Just ask Boeing if you would like to confirm my hypothesis.
3. If the SA government proceeds with the September date, and testing cannot be completed by then, then the government have in effect arbitrarily picked winners based on who can access the testing facilities. This could be a major disadvantage for an Australian company like Redback where the SA market forms a significant part of our revenue, and a multi-month lockout from that market could put Australian engineering jobs on the line.
4. In the event that the government chooses to go ahead with the very aggressive timeline that has been proposed, we request that manufacturers are given the opportunity to demonstrate that their inverters can have their firmware updated remotely, and allowed to continue installing in SA if they provide a guarantee that the functionality will be added by a given date (e.g. end of year).

Best regards,

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