

Dear Department for Energy and Mining,

I would like to contribute the following thoughts to the "Consultation on the Proposed New Low Voltage Ride-Through Requirements for Smart Inverters in South Australia".

The proposed implementation pathway seeks implementation as soon as possible to mitigate grid instability risks and proposes implementation until 1st of September.

From the proposed implementation pathway (Attachment_3_Consultation_on_Voltage_Ride_Through.pdf), it is not fully clear to me who is proposed to verify compliance to the proposed test procedure by means of what kind of evidence of compliance.

AEMO's memo

(https://aemo.com.au/-/media/files/stakeholder_consultation/consultations/nem-consultations/2020/short-duration-undervoltage/short-duration-vdrt-consultation-test-procedure.pdf?la=en)

proposes:

- > To determine compliance against the short duration VDRT test
- > procedure, manufacturers will need to undertake testing of their
- > inverters by a testing laboratory that has already been certified
- > against AS/NZS 4777.2 through the Joint Accreditation System of
- > Australia and New Zealand (JAS-ANZ) accredited certifying bodies or
- > from state electrical regulators.

The evidence of compliance would then be verified and documented by CEC.

The test procedure is not published in its final version yet, in-house testing has to be scheduled and time slots booked with testing laboratories, which is a process that will typically take months. I would consider it highly unlikely that many manufacturers will be able to meet the September deadline. A smooth adoption would therefore in my view require a probation period that allows manufacturers time to adapt.

I am interested to follow the conversation, so I would be thankful if you could include myself in a distribution list about the topic.

Best regards

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