

10 July 2020

To: ETRConsultations@sa.gov.au

Proposed Export Limit Requirements for Distributed Solar Generating Plants in South Australia

Dir Sir / Madam,

Meteocontrol Australia Pty Ltd would like to thank the Department for Energy and Mining in South Australia for the opportunity to provide input on the above consultation paper.

Meteocontrol Australia (MCAU) is a subsidiary of Meteocontrol GmbH, one of the world's leading provider of solar photovoltaic (PV) power plant monitoring and control hardware and software. Our BlueLog[®] data logger is applicable to monitor and control solar PV systems of any size and manufacturer. We support solar PV system operations through monitoring, remote control and intelligent feed-in management, ensuring optimised yields and returns.

Our expertise:

- Over 45,000 projects under management worldwide
- More than 20GWp of monitored power
- 40 years of experience in residential, commercial and utility-scale PV systems
- International presence in Europe, Asia, the Americas and Australia

To date, Meteocontrol Australia has provided over 2,500 BlueLog devices into the Australian solar PV market including South Australia.

MCAU welcomes the intent of dynamic export limits by SAPN to allow the increase of distributed solar generation that can be connected to the power system. We believe that the transition to a high density of Distributed Energy Resources (DER) and a two-way energy system is essential for the future of Australia's energy market.

Although the consultation paper does not specify how SAPN will implement the dynamic export limits and how the 'local' PV control will be affected, we are aware that SAPN is implementing dynamic export limits and Power Factors (PF) for PV systems greater than 200kWp. However, we trust that the use of SAPN SCADA on all solar PV systems will affect the financial viability of new solar PV systems.

Through our international experience in other high penetration solar PV markets, we would like to propose few technical considerations to implement an effective dynamic export limit:

1. Graphical user interface for configuration: a graphical user interface will assist the installer of the distributed solar generation to set up the control.
2. Fail-safe Operation mode: this operation mode would ensure the safety of the solar PV system under non-standard scenarios.
3. Switching setpoint method: this will allow SAPN to switch actively generation set points and further network support like reactive power.
4. Manufacturer independent device: manufacturer independence will allow a standard implementation of the dynamic export limit regardless of the inverter/Power Conditioning Unit (PCU) manufacturer.
5. Cyber and network security: the communication between SPAN and the solar PV system should be secured and encrypted.

We trust and support the South Australian Department for Energy and Mining consultation on the proposed export limit requirements for distributed solar generating plants in South Australia.

If you wish to discuss this submission in further detail please don't hesitate to contact me.

Kind regards,

A handwritten signature in blue ink that reads 'Barshevski'.

David Barshevski

Managing Director
Meteocontrol Australia
M: +61 431 266 101
E: d.barshevski@meteocontrol.com