

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 smart meter minimum technical standards 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 has the following concerns with the SA government proposal:

1. There is an existing proposal that DER will have to be able to be disconnected and reconnected through an alternative mechanism that does not involve the meter. This is a duplication of that effort and will result in significant additional cost to the consumer. The other mechanism does not pre-determine a technology solution and therefore is more likely to result in a least-cost technology solution.
2. The costs involved on install could be significant. For example, there are many locations in rural areas where the DER is not located at the meter box (which tends to be at the site entry), and running a cable back from the DER is both expensive and unnecessary.
3. The supposition that metering providers can reliably provide this capability is highly questionable. Their systems have never been used for this in the past and their systems are often batch based and not built for real-time control. Implementation of such a control layer is going to cost the consumer significantly, and it will be difficult to guarantee that it will work if needed.
4. If a back-stop mechanism for disconnecting DER and loads from the network is deemed to be required, then it should be technology neutral. If the metering providers can do it at lowest cost, then they can offer that as their solution. However, there exists other technology (for example the Redback Technologies Luceo platform and associated devices) that can provide this functionality at a lower cost than the additional metering technology (once install costs are included), and should be given the opportunity to compete in the space.

Regards,

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