



10 July 2020

**Suntrix submission to the SA Government consultation paper regarding proposed new low voltage ride-through requirements for smart inverters in South Australia**

Thank you for the opportunity to provide feedback on the South Australia Government Department for Energy and Mining proposed new low voltage ride-through requirements for smart inverters in SA.

I apologise for the brevity of this response. The challenges running an SME have been amplified with the recent Covid-19 pandemic and it is difficult to allocate sufficient time to document our concerns. We have also communicated our feedback to the Clean Energy Council who are similarly submitting a response.

Suntrix design, supply, install and maintain Solar PV and Battery Storage solutions for residential and commercial/industrial enterprises. The business was founded in South Australia in 2009 and operates across a number of states. Our head office is located in Newton and will always remain in South Australia.

Suntrix support the intention of AEMO's recommendation for a new test procedure for short duration under voltage ride through.

Suntrix do not support and are strongly against the suggested commencement date for the new requirement.

The September 2020 timeline suggested by the Department of Energy and Mining does not take into account the follow considerations:

- At the time of writing this document, we believe there are limited inverters currently capable of meeting the requirement.
- There are concerns that the South Australian market is too small for inverter manufacturers to fast-track (or even agree to) product changes and testing to meet the Government requirements.
- There are limited testing facilities available in Australia, with only one facility currently in operation and with a 2+ month waiting period.
- Inverter manufacturers are likely to pass on development and testing costs hence increasing price to consumers.
- There is a risk that only a small number of manufacturers will achieve the development/testing by the September 2020 timeframe – this will limit the product choices for consumers and may result in a lack of quality products available in South Australia.
- Companies often purchase inverters in bulk to secure favourable pricing. Suntrix, along with numerous solar companies have large quantities of inverters (eg. 5kW) in stock and it would be difficult to clear this stock by September – particularly in the current covid-19 environment. As we only sell residential systems in SA, we have no opportunity to sell these units in other states.
- Consultation is required to confirm how warranty inverters will be addressed. Solar systems are getting older and we regularly help solar consumers replace failed inverters that are both in and out of warranty. We require assurance from SAPN and Government that warranty inverters can



be replaced with the same/ like model, regardless of the new inverter requirements. If this is not the case, current solar consumers will be up for additional costs.

Running a business is often difficult. Working in the renewable energy industry has never been easy and our business has survived many challenges, the most recent being covid-19 which has limited our ability to sell and install our systems across Australia.

Suntrix has just reached its 11<sup>th</sup> birthday and we want to be able to continue operating and doing what we do best. The introduction of a 2020 timeframe for these requirements will significantly impact our ability to do business in South Australia and will have negative consequences for solar consumers in South Australia.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jenny Paradiso', with a long, sweeping horizontal stroke at the end.

Jenny Paradiso  
Managing Director