



**SMART ENERGY**  
COUNCIL

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Dear Sir/Madam

**Consultation on Regulatory Changes for Smarter Homes**

I am writing on behalf of the Smart Energy Council, a peak national body for the solar, energy storage and smart energy management industry, to respond to the proposed regulatory changes for smarter homes in South Australia.

The Smart Energy Council, and its member companies, are deeply concerned about the proposed timeframe for these changes. The consultation process, which began just before the end of the 2019/2020 financial year, was extremely limited and created significant confusion. The proposed implementation timeline is unrealistic and could cause enormous damage to the solar industry.

The consultation papers alone have led to cancelled orders, a reduction in forward orders and significant uncertainty in the solar industry.

The unrealistic, rushed timeframe has the potential to significantly impact on the solar and storage industry at the worst possible time. The industry is facing significant uncertainty with the lockdown in Victoria and cannot afford additional uncertainty in South Australia.

The proposed implementation timeline also appears to be divorced from the practical and lived experiences of global inverter manufacturers, local solar retailers and installers and SA Power Networks (SAPN). It is unclear how some of the proposals will be implemented, who will pay for the changes and how the proposed changes will be enforced.

The Smart Energy Council is particularly concerned that the proposed changes will leave South Australian solar families worse off financially.

The Smart Energy Council urges the South Australian Government to rethink the proposed approach, to reconsider the timelines and to immediately explore other mechanisms for addressing the critical system security issues.

The Smart Energy Council would welcome the opportunity to work with the South Australian Government to address these issues and would be pleased to facilitate an additional consultation process with its members and to provide other options for addressing the system security issues.

### **Timeframes**

The proposed timeframes outlined in the five consultation papers are simply unworkable.

It is simply not possible to make the proposed changes – new processes, testing and implementation – by September 2020. The solar and storage industry is not in a position to respond appropriately to these changes within this timeline.

The proposed timelines will create confusion for solar customers and solar workers. This could result in an unsustainable rush to install solar panels before the deadline or, conversely, it could lead to South Australians holding off on purchasing solar. There is also a danger that these proposed changes could dent consumer confidence in solar if they are not communicated effectively.

### **Remote disconnection and reconnection**

The requirement for all new and replacement solar PV systems to have a remote disconnection capability by September 2020 has not been well thought through. It is not clear what obligations will be placed on consumers, the SA Power Network and manufacturers, who will do this work and who will pay for this.

Importantly, it is not clear that products will be available to meet the September timeframe.

South Australians will need to know why systems are being ‘disconnected’, how often and for how long this will occur. This is an important communications exercise, which will take time to roll out.

### **Dynamic export limit capability**

The proposal for all new and replacement solar PV systems to have a dynamic export limit capability lacks clarity and it is unclear how it will be implemented.

## **Low voltage requirements**

The proposed timeline for implementation of this proposal – September 2020 – is unworkable. It does not give inverter manufacturers or solar retailers sufficient time to implement.

## **Smart meter technical standards**

The Smart Energy Council has strong concerns with this proposal. We note the view expressed by NRG Solar that *“having the solar and battery on the same channel of the meter is necessary to keep batteries charging in a black out. Many customers want to have this protection and is a reason for purchasing a battery...[the proposal] is not practicable and necessary when you have dynamic export”*.

## **Time of Use Tariff**

The Smart Energy Council supports this proposal. It should be phased in over time through voluntary arrangements.

## **Additional comments**

The Smart Energy Council agrees with its member company NRG Solar, a leading South Australian solar retailer, that the consultation papers create “red flags” around transparency, data storage and control and impact on solar customers and workers, among other issues.

## **Who are the Smart Energy Council?**

The Smart Energy Council is a peak national body for the smart energy industries. [www.smartenergy.org.au](http://www.smartenergy.org.au)

Founded in 1954, today we are a not for profit public company limited by guarantee. We have around 1000 members nationwide, including solar PV, inverter and battery storage manufacturers, distributors, retailers and installers, renewable energy project developers and investors, academics, analysts and consultants.

The Smart Energy Council is governed by a volunteer Board.

Should you wish to discuss these issues further, please contact Wayne Smith,  
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or on 0417 141 812.

Kind regards

**John Grimes**

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