

To: ETRConsultations@sa.gov.au

9th July 2020

Consultation on the proposed export limit requirements for distributed solar generating systems in South Australia

Solar Analytics welcome the opportunity to provide input to Department of Mining and Energy on the above consultation paper.

Solar Analytics (SolA) is an Australian company founded by solar industry veterans, scientists, developers and passionate photovoltaic (PV) experts. We design, develop and supply intelligent rooftop solar and energy management solutions for residential households and commercial businesses. With 35 staff and 40,000 customers across Australia, we are the leading independent provider of rooftop solar management in Australia. With the largest fleet of real time solar + energy consumption in Australia, we provide energy data to seven DNSPs, AEMO, ESB and other energy regulators.

SolA support the intent of the proposal to provide dynamic export limits. However we have a number of recommendations for the proposal:

- Delay mandating until technical standards are agreed, likely late 2021
- Align with national standards and processes and IEEE 2030.5 interoperability work
- Provide an export incentive to Solar Owners in the form of uncapped exports when capacity is available
- Start with mandating visibility from 1st Oct 20, as per industry supported
<https://www.dermonitoring.guide/>

Implementing the above changes would deliver:

- **Immediate visibility benefits** for SAPN, AEMO and all energy consumers
- Allows **time for national standards to be developed** and technology vendors to comply
- Minimises cost and maximises **value for consumers**
- Enables the **optimal solar system size** to be installed

DER Visibility and Monitoring Best Practice Guide

As both AEMO and SAPN have stated, visibility of the DER is of critical importance. Over the past 12 months an industry led best practise guide for providing visibility and monitoring of DER has been developed. This guide has now been published and is supported by all of the key industry bodies –<https://www.dermonitoring.guide/>.

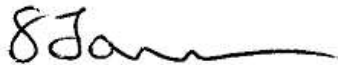
The key benefits of doing this are:

- Provides enhanced visibility to SAPN, AEMO and other industry bodies to ensure network security
- Harmonised data set available to energy market planners and regulators to manage the transition to a two way energy market
- Facilitates the effective transition to dynamic export and a two-way market
- Provides value to consumers through the provision of real time granular data and insights

Summary

In summary, we wholeheartedly support AEMO and SAPN's leadership in the adoption of increased DER and dynamic tariffs, however they need to be implemented in a timely manner in partnership with industry and with direct benefits for consumers.

Regards



Stefan Jarnason
CEO