



## **EVC response to Energy Security Board Interoperability Policy for Consultation: directions paper**

The Electric Vehicle Council (EVC) is the national peak body representing the electric vehicle industry in Australia. Our members include companies involved in providing, powering, and supporting electric vehicles.

**November 2022**

**In response to:**

<https://www.datocms-assets.com/32572/1665556228-interoperability-policy-directions-paper-final.pdf>

**EVC position:**

The need to manage solar installations, with a view to avoiding adverse system level outcomes, is clear and present. As a country, we're installing approximately 3GW of solar generation each year, largely on domestic rooftops. The scale of rooftop solar is at a point that it is causing state-level solar generation to exceed system minimum demand at some times. The mandatory application of CSIP-Aus to solar inverters is one element in a reasonable suite of responses to this issue. While it may have the outcome of increasing costs or negatively impacting uptake of rooftop solar, the continued rollout of inadequately controlled rooftop solar cannot reasonably be allowed to continue unabated.

This said, CSIP-Aus is a uniquely Australian solution, and has not been effectively tested at scale. It could reasonably be considered an element of an emergent regulatory framework. Depending on how well it works in practice, it has the potential to act as an inhibitor to any class of installation that it is applied to.

In the case of Vehicle to Grid (V2G), we already have a circumstance where the governing standard (AS/NZS4777), and the governing product approvals process (CEC approved inverter list), are not fit for purpose to support V2G installations. Review of the standard has

recently been proposed, in order to enable V2G to effectively enter the Australian market, and the EVC has been involved in expressing views on this matter:

[https://electricvehiclecouncil.com.au/wp-content/uploads/2022/10/EM-001- -4777\\_2-P-000142-comment.pdf](https://electricvehiclecouncil.com.au/wp-content/uploads/2022/10/EM-001- -4777_2-P-000142-comment.pdf)

It's expected that the review and update process of the standard will take 18-24 months, and that the CEC approved inverter list will be able to be modified following the update to the standard.

The addition of an emergent regulatory framework (CSIP-Aus) to an emergent technology (V2G), while the governing standards and product approvals process are also being reviewed, significantly increases the risk that installations of V2G will be inhibited due to conflicting compliance requirements or impacts on total installation cost.

The relative potential scale of V2G in the next 5 years is inconsequential compared to solar, so there is negligible risk to the energy system associated with it. V2G is presently at a point of limited trial programs, and vehicles capable of supporting V2G are relatively uncommon. In the long run, V2G has the potential to be highly significant in the energy system, but it will start small, and the more compliance hurdles we put in the path, the longer it will take to start.

The better approach at this point would be to exempt V2G inverters from the requirement to comply with CSIP-Aus in the near term, in order to reduce the number of new hurdles being placed in front of a potentially highly valuable future capability. The proposed timeline for compliance to CSIP-Aus is July 2024. The EVC suggests that a carve out for V2G inverters be made that defers require compliance to CSIP-Aus for that hardware type until 2028, by which time it's expected that V2G will be occurring at small scale in the community, and any necessary lessons relating to the practical application of CSIP-Aus will have been learned and actioned.