

Our ref: 0743-1608241381-416

16 November 2022

Ms Anthea Harris
Chief Executive Officer
Energy Security Board
Level 15, 60 Castlereagh St
Sydney NSW 2000

By email: info@esb.org.au

Dear Anthea,

Response to ESB Interoperability Policy - Consultation Paper

Thank you for the opportunity to comment on the Energy Security Board's (**ESB's**) Interoperability Policy – Consultation Paper (**the consultation paper**).

The comments set out in this letter reflect the views of the Energy and Water Ombudsman Queensland (EWOQ) and the Energy & Water Ombudsman South Australia (EWOSA). We are the industry-based external dispute resolution schemes for the energy and water industries in Queensland and South Australia.

We support the intent to establish clear and future-ready frameworks and an Interoperability roadmap for consumer energy resources including future standards related to electric vehicle supply equipment and behind the meter interoperability as well as cyber considerations.

We acknowledge a range of technical standards will be required to effectively serve consumers' interests as the electricity system incorporates greater market participation by consumer energy resources and this work is commencing with the AEMCs review of CER technical standards and AER's flexible export consultation paper.

We acknowledge and welcome the reforms and the broader approach to the Implementation Plan, which is strongly grounded on ensuring a fit-for-purpose protections framework that improves experience for all customers.

As industry ombudsman schemes, we recognise the need to ensure appropriate consumer protections are available for new energy products and services and are supportive of proposals that will improve outcomes for energy consumers.

We have collectively reviewed the Consultation paper and have provided responses below.

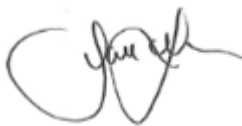
Consultation questions
1 Are the five identified domains correctly summarised? Are there gaps or major limitations in this framing?
Yes – well summarised.
2 What priority should each domain be assigned, considering the interest of all electricity consumers within the consumer energy resource interoperability landscape?
In order of priority: 1 <i>CER-market interoperability</i> - highest focus --> Benefits and innovation for the owner - engagement and participation important – innovation of services unlocked 2 <i>Behind the meter interoperability</i> 3 <i>CER network interoperability</i> - potentially supports achieving lowest costs and greatest community benefits from seamless networks operations and reduced network investment 5 <i>Network – AEMO interoperability</i> 4 <i>Network- X interoperability</i>
3 What are the likely costs and benefits for consumers associated with a national ‘flexible export ready’ mandate including in relation to future readiness of customer installations and installation costs?
There are benefits both to consumers and industry in terms of consistency – not subject to state based legislative nuances. Preparedness now provides clarity for industry, protections for consumers, while not stifling innovation. We would also like to emphasise that any roll out needs to be supported by a customer education program and appropriate notification to likely impacted customers.
4 Do stakeholders agree that DNSPs are best placed to enforce a ‘flexible export ready’ mandate at the time of installation? If not, what alternative models should be considered?
Yes we consider DNSPs are well placed to enforce this mandate at the point of connection agreement sign off. This would ensure appropriate certification cited before systems are energised.
6 What are the pros and cons of a flexible export ready mandate set in the Rules, via a subordinate instrument, or under a separate head of power (e.g. jurisdictional technical regulation)?
We are of the view national legislation is preferred acknowledging this maybe slower to enact. We support the observation that consistency will support international consistency in products and standards noting consumers and networks import many of the products/devices to be connected to the networks.
7 If implemented under the Rules, which market body is best placed to establish and oversee the proposed requirement on DNSPs?
The Clean Energy Regulator or a new technical regulator best placed in terms of accreditation powers. We note CER mandate may need to be extended to cover all solar installers and manufacturers.

8 What are the pros and cons of a flexible export ready mandate referring to CSIP-Aus in Standards Australia Handbook form?
This is stronger than a voluntary code or guideline and provides safeguards and a level playing field for consumers.
11 What are the pros and cons of establishing a national certificate authority?
A national certificate authority has the benefit of ensuring consistency and integrity – industry and customers can rely on a national register, however this could be costly to implement and manage to keep current.
13 What views do stakeholders have about the adaptability of existing industry-led product certification and compliance processes for future use?
We note the encouraging work to develop the New Energy Technology Consumer Code (NETCC). However, we are concerned there may be insufficient independence and teeth to support compliance. This is supported by lessons learned with failures of solar inverter compliance with AS 4777 (monitoring and compliance action). In particular the non -compliance with the technical standard for minimum inverter ride through (AS 4777. 2:2020).
14 What views do stakeholders have about the most appropriate body to have oversight of the product certification and listing/delisting processes?
The efficiency and integrity of listing and de-listing processes is critical to customer and industry trust. We support in principle a new national technical regulator like the CER but broader mandate.
15 What role could DNSPs have in the product certification/decertification process in the context of improving outcomes for industry and consumers
We suggest DNSPs should be independent and impartial, but they can list or reference a list of preferred suppliers. The secure, safe and reliable operation of the network is their core function. Their operation and monitoring of devices connected to the network is likely to be useful and informative to the processes of monitoring compliance and enforcement. Information sharing with regulatory bodies on these matters would be prudent and we note the ESB via their Data Strategy and broader CER work stream are addressing this matter.

Thank you for the opportunity to respond to the consultation paper.

If you require any further information regarding our submission, please contact Mr Jeremy Inglis, Principal Policy Officer (EWOQ) on 07 3087 9423 or Ms Jo De Silva, Policy and Communications Lead (EWOSA) on 08 8216 1851.

Yours sincerely



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