

WAERA Team,

### **Proposed Technical Rules changes by Western Power (WP)**

The Clean Energy Council is the peak body for the clean energy industry in Australia. We represent and work with over 400 leading businesses operating in solar, wind, energy efficiency, hydro, bioenergy, energy storage, geothermal and marine along with more than 4000 solar installers.

The Clean Energy Council is committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

#### Summary –

The Australian standard AS4777 establishes limitations on DC injection from inverter energy systems. The implications of DC injection for the effective and efficient operation of distribution networks have not been demonstrated to be significant. Indeed the AS4777 standard is relied upon by all other Australian distribution networks, removing the need to impose additional connection requirements in technical rules. As a result the proposed changes would bring the SWIS in line with the rest of the country, consistent with good electricity industry practice, and remove unnecessary barriers to the efficient integration of customer-led embedded generation.

#### Detail -

The fact that no other Australian network includes a DC injection threshold indicates that relying on the historic presence of a DC injection threshold is insufficient to demonstrate that a revised threshold be placed in the Western Power Technical Rules (WPTR). Indeed Western Power should be expected to, at a minimum demonstrate why their network elements are unique and how DC injection impacts as a result, in order to justify the need for any particular threshold to be stated in the WPTR.

This has not occurred and indeed Western Power's revised wording concurs that studies to date have not identified any risk with removing the relevant DC injection clause from the WPTR (cl. 3.2.1(c)(3)). In addition Western Power notes that there is "no change in the level of risk in response to removal of this clause".

As result of these considerations the CEC supports the removal of the clause entirely and expects that barriers to efficient market entry will be alleviated as a result.

An additional point we would like to highlight is that the current approach to setting and changing of technical rules requires re-consideration in line with the Energy Market Reform processes. A competitive energy services market relies on clarity and consistency in addressing the reasonableness of requirements for

grid connection. A national framework with clear rules is required to establish this and this should be considered in Energy Market Reform processes.

We believe WA has a unique opportunity to take advantage of the bipartisan agreement on the RET and move towards a cleaner energy future, and not be left behind, scrambling in years to come to catch up with the rest of the world and potentially, the rest of Australia.

We welcome the opportunity, as the WA branch of the Clean Energy Council, to work with you in ensuring a sound basis for WA's clean energy future as the Energy Market Reform process moves ahead.

Yours sincerely

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