

To whom it may concern,

Thank you for the opportunity to provide feedback on the Exposure Draft of the Tranche 8 Proposed ESM Amending Rules. I'm writing as a representative of *OffGrid WA*, a Western Australian-based provider of off-grid solar and battery systems, working primarily in regional and remote communities.

While OffGrid WA operates mainly outside the Wholesale Electricity Market (WEM), we remain actively engaged in energy reform developments, as they shape the broader regulatory environment, influence supplier requirements, and often serve as early indicators of future compliance pathways across both grid and non-grid sectors.

General Feedback & Observations

1. Support for Clearer ESR Rules and Duration Requirements

We support efforts to clarify and structure requirements for Electric Storage Resources (ESRs), particularly in recognising the need for longer-duration storage and ensuring older systems aren't disadvantaged by evolving standards. This provides much-needed certainty and stability for investment.

2. Concerns About Administrative Burden on Smaller Providers

As the scope and complexity of compliance mechanisms increase, there is a risk that small-to-medium-sized solar and battery providers (especially those on the fringe of the grid or in hybrid scenarios) will struggle to navigate additional red tape. We encourage the development of simplified guidance or support channels for non-aggregated and independent market participants.

3. Risk of Market-Only Thinking in Design

Many of the rule changes are understandably focused on WEM participation. However, it would be helpful for Energy Policy WA to consider consultation pathways that also include off-grid and decentralised energy providers, as they play a growing role in resilience, decarbonisation, and rural electrification efforts.

4. Clarification Requested on Application Scope

Some of the rules — such as those relating to battery duration, load pairing restrictions, and capacity credit obligations — are ambiguous in terms of how (or if) they apply to emerging behind-the-meter, standalone power systems (SPS), or community energy projects. Clarifying these boundaries would avoid confusion down the line.

5. Concerns Around Delayed Payments or Market Rounds

The trend of “round-based” access to markets or incentives has proven problematic in other contexts (e.g., the Solar VIC rebate scheme). If similar structures are extended in WA, we encourage a focus on timely access and cashflow predictability, especially for smaller businesses.

Suggestions for Improvement

- Consider consulting or forming working groups with representatives from the off-grid and remote solar industry.
- Provide a plain English summary of market changes that may indirectly affect storage system suppliers and installers.
- Clarify the non-applicability or optional nature of market registration requirements for off-grid systems.
- Provide early insight into any planned harmonisation between WEM rules and evolving national battery safety standards (e.g., AS/NZS 5139 compliance pathways).

Thank you for your ongoing efforts in shaping a more robust and responsive electricity system in Western Australia. We would welcome the opportunity to remain engaged in future discussions relevant to decentralised and off-grid energy systems.

Kind Regards,



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