

Paul Nankervis – Public consultation submission

Exposure draft: Proposed Electricity System and Market Rules for Distributed Energy Resources

Dear Energy Policy WA Team,

Thank you for the opportunity to provide feedback on the proposed changes to the DER Rules. I commend the direction of these reforms and strongly support their timely implementation. They represent a critical step toward enabling broader consumer participation in Western Australia's energy transition, and unlocking greater value by better orchestrating new and existing DER assets.

I currently operate a Powerwall 3 with a single-phase inverter limited to 5 kW of generation. This restriction significantly reduces my ability to maximise self-consumption, particularly when charging electric vehicles or using high-load appliances. At these times, I often need to import power from the grid, despite having a fully charged battery and ample solar and physical inverter capacity.

While I understand that rules have evolved since our system was installed, I believe strongly in the principle that on-site power use should be prioritised over grid imports. In an electrified household, this should mean allowing more than 15 kW of on-site generation and consumption. Properly implemented flexible export limits can enable this while still protecting grid stability.

A related concern is the current emergency backstop measure, which I understand sets inverter generation to 0 kW during extreme solar events. I recommend that this mechanism instead set the site export limit to 0 kW, allowing continued local generation and consumption, without forcing households to import all energy from the grid during a backstop event.

I also understand that Synergy is working with CSIP-Aus standard bodies to incorporate VPP controls into the same protocols used for flexible export limits. While I support this integration, it's important that households retain the option to use flexible exports without being required to join a VPP. Many consumers are wary of current VPP programs, which usually involves handing over full asset control to a 3rd party. Future VPPs should adopt softer participation models, such as price signalling, that allow asset owners to dynamically balance local consumption (including EV charging or reserving battery capacity), against grid support.

I also encourage greater transparency in the DER equipment approval process. Consumers lack visibility into which products have not sought approval or which are under review. Publishing an indicative approval status, or at least a clear list of products

under active assessment, would greatly assist consumers and installers in planning and making informed decisions.

More broadly, the existence of multiple equipment approval processes and DNSP-specific use cases across states is creating unnecessary complexity. While the CEC approves equipment for electrical connection, states increasingly require CSIP-Aus connectivity for emergency backstop, flexible limits, dynamic connections, and VPP control. Each entity maintains its own approval list. I urge the development of a unified national standard that incorporates all requirements including functionality, testing, special case handling, commissioning and registration procedures, and more. As part of this all equipment approved for use in Australia should be capable of supporting flexible exports and other important emerging functions. In addition equipment registration should not be DNSP-specific; one set of procedures should register behind the scenes to the appropriate DNSP, and allow a switch to others where applicable.

Finally, I'd like to highlight the need for greater public engagement and education. My awareness of this consultation stems from personal interest, but most people I know are unaware of the opportunities and benefits of electrification, and they're unlikely to seek out this information proactively. Unlike gas, which is widely advertised, electrification lacks accessible public messaging. To support the energy transition, I recommend significantly expanding outreach efforts and providing clear, easy-to-read guidance that highlights benefits and available programs, without requiring consumers to navigate complex technical documents and reference web sites.

Thank you again for the opportunity to contribute to this important consultation.

Kind regards,

Paul Nankervis