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To Energy Policy WA
Subject WA DER Market Participation Forum
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Good Afternoon

Thank you for the opportunity to respond to the proposed changes outlined in EPWA's public consultation – Making it easier to connect solar, batteries and EV chargers.

AGL supports the policy direction outlined in the WA DER Market Participation Forum material and the proposed reforms to improve DER data quality, connection timeframes and commercial DER participation in the SWIS. In practice, the current Western Power connection arrangements for commercial solar and battery projects create significant hurdles for systems between 30 – 999 kVA.

Complex and fragmented connection pathway

Commercial systems above 30 kVA still require multiple steps across enquiry, application, technical assessment, approval, commissioning and approval to operate. This creates more handoffs than necessary between the customer, installer, retailer and Western Power. We've recently considered that a 110kVa system connection for a customer is expected to take 16 months for energisation, which is alarming for all parties involved.

Longer timeframes for larger systems

Systems under 200 kVA can still face delays from technical schedules, commissioning windows and compliance requirements. Projects approaching 1 MVA face even greater complexity, including feasibility reviews, network studies and more detailed operating approvals. Overhauling the existing connections process will be pivotal to ensuring greater up-take in commercial solar and battery deployment in the SWIS.

High administrative and technical burden

The current processes require significant documentation which often results in specialist engineering input. This increases cost and creates barriers for customers that would otherwise proceed with solar or battery projects.

Lack of standardisation

Similar commercial solar projects can experience different requirements depending on site conditions, export settings and network constraints. This makes deployment less repeatable and harder for retailers and installers to scale.

Put simply, the result of the abovementioned is that commercial solar and battery installation in the SWIS is not scaling as quickly as it could. This delays customer savings, peak demand reduction, VPP participation and broader DER market development. AGL therefore supports the proposed reform direction to simplify requirements for C&I solar and batteries, introduce a single connections process for systems up to 1 MVA and to enable faster and more straightforward commissioning using CSIP-AUS for systems up to 200 kVA.

Kind regards

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