



Making it Easier to Connect Solar, Batteries and EV Chargers

Western Australia

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Master Electricians Australia (MEA) is a peak industry association representing electrical contractors across Australia, the majority of which are small and medium sized businesses and has been supporting Australia's electrical businesses since 1937. We are recognised by industry, government and the community as a leading business partner, knowledge source and advocate. You can visit our website at www.masterelectricians.com.au

MEA welcomes the opportunity to provide feedback on the proposed reforms to improve Distributed Energy Resource (DER) data quality, connection processes and system integration in Western Australia.

It is critical that achieving these objectives does not inadvertently impose costs or obligations on supply chain participants, and that responsibilities remain with the party best placed to meet them. Requirements should avoid unnecessary duplication and administrative burden, particularly for small businesses.

Feedback on the Seven Proposals

Principle 1: Increasing DER Standing Data Quality

Reform Proposal 1 – Require inverters up to 30 kVA to be CSIP-AUS (v1.2) enabled to support interoperability of DER devices.

MEA supports a baseline communication protocol requirement and interoperability. We also support nationally harmonised requirements to enable OEMs to offer a range of products to the Australian market.

Applying CSIP-AUS to systems up to 30 kVA could reduce the number of different communications requirements contractors and manufacturers need to navigate across jurisdictions.

Several matters should be clarified to ensure the requirement is practical and does not place compliance obligations on electrical contractors for matters outside their control:

- *Scope – New and Upgraded Systems Only:* Any new requirements should apply only to new inverter installations. The reference to “all customer sites up to 30 kVA” could otherwise be interpreted as applying retrospectively to existing installed inverters. Exemptions should also be clearly stated that it will not apply to replacement inverters installed as part of a repair in accordance with the Wiring Rules
- *Responsibility for Compliance:* It needs to be clearly understood by regulators that manufacturers are responsible for ensuring CSIP-AUS capability. Electrical contractors should not be held responsible for communications functionality that is dependent on the inverter manufacturer, firmware, cloud platform, internet connectivity or retailer/aggregator arrangements.
- *Practical Implementation Considerations:* The implementation should account for practical considerations associated with CSIP-AUS, including internet connectivity and other matters.
- *National Approach:* Inverter requirements should be nationally harmonised given Australia is already a relatively small market in global terms.

Reform Proposal 2 – DSO Functions to Collect, Validate and Share Data

MEA supports the objective of improving the collection and validation of DER standing data and recognises the role of Western Power in maintaining accurate network information. Customer protections are essential to ensure data is only used for an agreed purpose.

However, the reform should not create unnecessary administrative or compliance burdens for electrical contractors, particularly small businesses. Any data requirements placed on installers should be limited to information reasonably available to them and should avoid duplication with existing connection and compliance processes. Where possible, data should be transferred through integrated digital systems rather than requiring contractors to manually enter information across

multiple platforms.

Importantly, Western Power should retain responsibility for validating and maintaining network-level data. Electrical contractors should not be held responsible for ongoing accuracy of information outside their control, nor for administrative errors that do not affect the safety or technical compliance of an installation.

Reform Proposal 3 – Indirect data collection for electric vehicle chargers

Using existing electrical safety certificate processes to improve visibility of EV charger installations is a sensible, low-cost approach and should minimise the need for additional reporting processes.

Where additional information is required from electrical contractors, it should be limited to information that is readily available without additional administrative burden on business and reasonably verifiable at the time of installation. Requirements should not duplicate information already captured through existing connection or certification processes, or require contractors to verify technical functionality that is dependent on the charger manufacturer, software or communications provider.

MEA also recommends that any changes to certificate data requirements be clearly defined, subject to industry consultation and implemented through streamlined digital processes. This will be particularly important for small electrical businesses, for which additional administrative requirements can create a disproportionate burden.

Principle 2: Making It Easier for Businesses to Connect DER

Reform Proposal 4 – Standardised Data to Create an Easier Connection Pathway

The proposed standardised pathway has the potential to significantly reduce the time and cost associated with connecting routine commercial DER and should support greater uptake of commercial solar, batteries and EV chargers.

However, any new data or technical requirements should deliver a corresponding reduction in connection complexity. The proposal should clearly identify which existing

connection steps will be removed or streamlined, rather than simply adding new requirements alongside the existing process.

Principle 3: Better Understanding how VPPs Mitigate Grid Impacts and Maximise Opportunities They Can Deliver

Reform Proposal 6 – Explore mechanisms for VPP operators to provide simple capacity data.

Improved visibility of VPP capacity could assist Western Power and other market participants to better account for VPPs in network planning. Any data-sharing requirements should remain proportionate and sit with VPP operators or relevant market participants, rather than creating additional obligations for other supply chain parties.

It is essential that customer protections are in place and clearly communicated.

Are There Other Things That Should be Considered to Improve DER Data Quality, Collection and/or Data Flows?

Improving DER data quality should focus on better integration and validation of information already collected, rather than creating additional reporting obligations for electrical contractors. Greater interoperability between existing systems and clear allocation of responsibility for data accuracy would improve data quality while minimising administrative burden for businesses.

Where additional information is required from supply chain participants, this should only be introduced following thorough consultation with relevant industry stakeholders and consideration of the costs and administrative burden involved.

How Well Do Data Sharing and Connection Processes Work for Different Stakeholders, Like Consumers, DER Installers, Electricity Retailers, and Potential Aggregators?

Electrical contractors already provide significant information through existing electrical safety certification and connection processes. The greater opportunity is to improve data automation, interoperability between systems and ensure information is shared between relevant parties, rather than requiring contractors to repeatedly provide the same information.

From an electrical contractor perspective, processes would be improved by reducing duplication and manual data entry, and providing greater clarity about which party is responsible for providing, verifying and maintaining particular information. Contractors should be responsible for providing accurate information about the installation at the time of installation with the simplest method for providing it as possible, but should not be responsible for maintaining information that changes after installation or is controlled by another party, such as a retailer, aggregator or equipment provider.

Will Proposals in This Paper Broadly Help to Increase DER Uptake and Participation, By Making It Easier to Install or Upgrade Systems?

The proposals have the potential to support continued DER uptake by improving data quality, standardising requirements and creating simpler pathways for connecting and upgrading systems, providing requirements do not restrict availability of products. Given WA already has high levels of residential DER uptake, the greater opportunity is to support the efficient integration of increasing DER capacity while managing network costs and maintaining reliable electricity supply.

For electrical contractors, the greatest benefit will come where these reforms genuinely reduce connection complexity, processing times and administrative requirements. While the reforms offer potential installation benefits, they also risk creating additional administrative burden and liability for installers. Any new data or

technical requirements should therefore be proportionate and accompanied by a corresponding reduction in existing connection requirements.

Conclusion

MEA supports the overall objectives of the proposals and recognises the opportunity to improve DER data quality, interoperability and connection processes as DER uptake continues to grow across Western Australia.

For electrical contractors, the success of these reforms will ultimately depend on whether they simplify existing processes and reduce the time, cost and administrative burden associated with DER installations and connections. New requirements should be proportionate, clearly allocated to the party best placed to meet them, and supported by effective digital integration and appropriate transition arrangements.

MEA encourages DEED to continue working closely with electrical contractors and other industry stakeholders as the proposals are developed to ensure that improvements to DER data and system planning do not inadvertently create additional compliance costs, administrative burden or liability for the businesses delivering these systems.

We look forward to the outcome of the consultation and are available for further discussion.