

Submission: Making It Easier to Connect Solar, Batteries and EV Chargers

To: Energy Policy WA (EPWA), Department of Energy and Economic Diversification (DEED WA)

Re: Issues paper on connections and data quality for distributed energy resources (Project Jupiter), 20 July 2026

Submitted by: The Smart Energy Council (SEC WA)

Date:

The Smart Energy Council (SEC WA) welcomes the opportunity to respond to the Energy Policy WA (EPWA) issues paper on connections and data quality for Distributed Energy Resources (DER). This submission responds directly to the seven reform proposals set out in the paper. It is informed by two consultation meetings DEED WA held with SEC WA and our members on this reform process, and by the frontline experience of people working in the Commercial and Industrial (C&I) space, including SEC WA members with a growing focus on medium to large scale battery projects.

Executive Summary

SEC WA broadly supports the approach EPWA is taking through this issues paper and welcomes the direction of the proposed reforms. Given the very positive recent changes to the Small scale Renewable Energy Scheme (SRES), which now supports systems up to 1 MVA, we believe these connections and data reforms need to be progressed quickly, so that a surge in applications does not simply create a new bottleneck at the connections stage.

Our key points, addressed against each proposal below, are:

- Proposal 1 (CSIP-AUS v1.2 mandate) is not opposed, but Western Power's current witness testing capacity is already a bottleneck. Mandating CSIP-AUS more broadly without addressing testing capacity risks creating a new constraint in place of the one it removes.
- Proposal 4 (standardised connection pathway up to 1 MVA) is our highest priority. Commercial and Industrial (C&I) connections currently take 8 to 11 months, driven by bespoke engineering assessments that suitably qualified, accredited installers should be able to complete themselves under a standardised CSIP-AUS commissioning pathway. This was also one of the most extensively discussed issues in the consultation sessions to date, and we consider it a key response for EPWA to prioritise.
- Proposal 5 (published network capacity data) should go further than aggregate, feeder level publishing. Applicants are currently paying thousands of dollars for engineers to map Western Power's own infrastructure, a cost that can determine whether a project proceeds at all.
- Proposal 6 (VPP definition) is supported in its proposed narrow form, but a related gap remains unaddressed: there is currently no accountability mechanism for when manufacturers remotely change system ratings fleet wide.

We address each of the seven proposals in turn below.

Principle 1: Increasing DER Standing Data Quality

Proposal 1: Require inverters up to 30 kVA to be CSIP-AUS (v1.2) enabled

What we are seeing:

- Witness testing is already a major bottleneck for Western Power. As discussed in EPWA's consultation meetings with SEC WA, there is a queue of approximately 100 manufacturers awaiting testing, with small Original Equipment Manufacturers (OEMs) hit hardest
- Testing already passed for other purposes must still be repeated for Western Power, adding unnecessary delay
- Technical requirements currently sit within Synergy's VR Technical Handbook rather than in standardised rules, leading to inconsistent interpretation across the sector

SEC WA's assessment:

- We have no opposition to moving technical requirements into the Electricity System and Market (ESM) Rules and mandating CSIP-AUS v1.2, consistent with Proposal 1. A consistent approach removes unnecessary work for installers and OEMs and lets smaller contractors deliver larger projects without engaging additional consultants
- However, extending mandatory CSIP-AUS beyond Synergy customers will increase the number of products requiring witness testing. Unless testing capacity is addressed at the same time, this reform risks creating a new bottleneck in place of the one it removes. We recommend EPWA pair this proposal with a plan to expand Western Power's testing capacity, or to recognise CSIP-AUS testing already completed for other purposes
- We recognise there will be a transitional cost to industry in moving to this mandate. Provided EPWA gives clear requirements and sufficient lead time for installers, OEMs, and Western Power to prepare, this is no insurmountable.

Proposal 2: Establish distribution system operator (DSO) functions to collect, validate and share data***What we are seeing:***

- Applicants are effectively being used to surface Western Power's own network knowledge gaps. For zone and site maps, applicants are paying approximately \$2,000 for engineers to map Western Power's own infrastructure, because Western Power does not know where its own assets are

SEC WA's assessment:

- We strongly support legislating clear DSO data obligations for Western Power. This is a direct fix for the cost shifting our members currently experience, where applicants are paying to establish information that should already sit with the network operator

Proposal 3: Indirect data collection for electric vehicle chargers***What we are seeing:***

- Electric Vehicle (EV) uptake is currently 20 to 30 percent, and wall box chargers (single or three phase) represent a significant load
- Western Power's Advanced Metering Infrastructure (AMI) data suggests most charging occurs on 10A wall sockets, but industry experience suggests 7 to 22 kW chargers are more common among known EV clients than AMI data implies

SEC WA's assessment:

- We support the proportionate, low cost approach of collecting data indirectly through existing Building and Energy Safety paperwork rather than creating a new Western Power notification form
- We believe consideration should be given to also using car ownership data as part of this process of data collection.
- We caution that AMI derived assumptions about typical charger size may understate real world load, and recommend EPWA validate the proposed data fields against installer experience, not only against AMI observations, before finalising this proposal

Principle 2: Making It Easier for Businesses to Connect DER**Proposal 4: Standardised data to create an easier connection pathway*****What we are seeing:***

- Commercial and Industrial (C&I) connections were one of the most extensively discussed issues raised across DEED WA's two consultation meetings with SEC WA and our members, and this remains a key focus of our response

- Commercial and Industrial (C&I) systems between 30 kVA and 1 MVA currently face a connection timeline of 8 to 11 months from first customer contact to switch on, driven by bespoke engineering designs, DNSP connection steps, and upstream grid studies required for every project
- Small scale Renewable Energy Scheme (SRES) support now open to 1 MVA is expected to bring a flood of 500 to 600 kW applications the current process cannot absorb
- Post installation surprise costs, such as transformer upgrades, are a key pain point still to be resolved

SEC WA's assessment:

- This is our highest priority proposal. We strongly support a single standardised connection pathway for all systems up to 1 MVA, with CSIP-AUS extended as a communication option for larger commercial solar as proposed
- For suitably qualified and accredited installers, most of the application, technical documentation, and commissioning should be able to be completed in house under a standardised CSIP-AUS based checklist, rather than requiring a bespoke engineering assessment for every project
- Given the transitional period EPWA is proposing, we recommend prioritising this proposal so it is in place before the expected surge in SRES driven applications reaches Western Power

Proposal 5: Requirements to share network capacity

What we are seeing:

- Western Power already publishes a network capacity map, but only at suburb level, and it does not distinguish daytime export constraints from evening peak demand
- It is unreasonable for applicants to pay thousands of dollars for engineers to map Western Power's own infrastructure, and these additional costs can be the difference between a project proceeding or not for smaller businesses

SEC WA's assessment:

- We support this proposal, but recommend it go beyond aggregate, feeder level forecast and historical data. Western Power's existing interactive network opportunity map (iNOM) already demonstrates street level capacity reporting is achievable, and this level of detail would materially improve project assessment before proponents commit to engineering costs

Principle 3: Better Understanding How VPPs Mitigate Grid Impacts

Proposal 6: Explore mechanisms for VPP operators to provide simple capacity data

What we are seeing:

- Through DEED WA's consultation meetings with SEC WA, we understand there is currently no accountability mechanism for when manufacturers remotely change system ratings fleet wide (for example, a Tesla recall, or a Sigenenergy (SIG) reduction from 10 kW to 5 kW)

SEC WA's assessment:

- We support the proposed definition of a Virtual Power Plant (VPP) as deliberate, remote aggregator activity, excluding OEM cloud or app platforms and automatic device level responses such as storm forecast charging. A broader definition would capture routine safety behaviour and add reporting burden without improving network visibility
- The lack of an accountability mechanism for fleet wide remote rating changes is a genuine and separate gap. Even where this sits outside the scope of the VPP definition, we recommend EPWA confirm where in the regulatory framework this issue will be addressed, so it is not simply left unresolved

Proposal 7: Tie Western Power requirements to share network capacity information with VPP opportunities

What we are seeing:

- Western Power’s interactive network opportunity map (iNOM) already shows VPP opportunities at street or distribution feeder level, but only for network service contracts, not network wide

SEC WA’s assessment:

- We support broadening iNOM style data across the full distribution network on an open, self serve basis. This would let retailers and aggregators identify where storage export or managed EV charging is worth offering as a product, and would support commercial customers, who are more likely to engage with these opportunities given their focus on operating costs

Summary of Positions

Proposal	SEC WA Position
1. CSIP-AUS v1.2 for inverters up to 30 kVA	Support, subject to witness testing capacity being addressed so the mandate does not create a certification bottleneck
2. DSO data collection, validation and sharing functions	Support. This directly addresses applicants bearing the cost of mapping Western Power’s own network
3. Indirect EV charger data collection	Support the proportionate, low cost approach, with a caution that AMI based assumptions about charger size may understate real world load
4. Standardised connection pathway up to 1 MVA	Strong support. This is the highest priority reform for our members
5. Published network capacity data	Support, with a recommendation to go beyond aggregate feeder level data toward street level detail
6. VPP definition and controllable capacity data	Support the proposed narrow definition; flag an unresolved gap in accountability for fleet wide remote rating changes
7. Tying network capacity data to VPP opportunities	Support broadening iNOM style data beyond network service contracts

Conclusion

SEC WA supports the direction of this issues paper and the seven reform proposals it sets out. Our strongest support is for Proposal 4, the standardised C&I connection pathway. This has consistently been one of the most discussed issues across consultation on this reform, and our members experience it as the most significant barrier to an efficient DER rollout today. With SRES now open to systems up to 1 MVA, the volume of applications reaching Western Power is set to rise sharply, and this reform needs to keep pace so that a welcome policy change does not stall at the connections stage. We also ask EPWA to consider two implementation risks as this work progresses: witness testing capacity under Proposal 1, and the unresolved accountability gap for fleet wide remote rating changes raised under Proposal 6.

Recommendations

1. Support Proposal 1 (CSIP-AUS v1.2 mandate), paired with a plan to expand witness testing capacity or recognise testing already completed, so the mandate does not create a new bottleneck
2. Support Proposal 2 (DSO data functions) as a direct fix for applicants currently bearing the cost of mapping Western Power’s own network
3. Support Proposal 3 (indirect EV charger data collection), validated against installer experience as well as AMI data

4. Prioritise Proposal 4 (standardised C&I connection pathway up to 1 MVA) ahead of the expected surge in SRES driven applications, with CSIP-AUS based commissioning available to suitably qualified and accredited installers
5. Extend Proposal 5 (published network capacity data) to street level detail, consistent with Western Power's existing iNOM capability
6. Support Proposal 6's narrow VPP definition, and confirm separately how fleet wide remote rating change accountability will be addressed
7. Support Proposal 7 (network capacity tied to VPP opportunities), broadening iNOM style data beyond network service contracts

We would welcome the opportunity to discuss this submission further and to support EPWA in developing a workable set of connections and data reforms for Western Australia's DER market.

Yours sincerely,

John

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Smart Energy Council (SEC WA)