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By electronic submission epwa-submissions@deed.wa.gov.au

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Submission: Making it easier to connect solar, batteries and EV chargers

Issues paper on connections and data quality for distributed energy resources 20 July 2026

<https://www.wa.gov.au/government/document-collections/public-consultation-making-it-easier-to-connect-solar-batteries-and-ev-chargers>

We welcome the opportunity to make a submission and are happy to provide any clarifications and additional information as required.

Purpose

DEED/EPWA are seeking feedback from the public on the above issues paper, specifically:

1. Do you have feedback on the seven proposals?
2. Are there any other things that we should consider to improve DER data quality, collection and/or data flows?
3. How well do data sharing and connection processes work for different stakeholders, like consumers, DER installers, electricity retailers, and potential VPP aggregators?
4. Will proposals in this paper broadly help to increase DER uptake and participation, by making it easier to install or upgrade systems?
5. Are there parts of the DER connection process we should pay specific attention to as part of this reform work?

Consultation Process

It is important to note that whilst it is positive that the Department is listening to feedback around its proposed changes, the consultation process for DER market participants is fundamentally different from that of large scale or traditional energy market stakeholders.

An existing power station owner, financier or constructor has multiple staff available who can engage in this process, review a 26 page document, and spend time reflecting and formulating a response.

DER stakeholders will typically be electrical contractors, solar and battery installers or Original Equipment Manufacturers (OEMs) headquartered in Sydney or Melbourne, who are without local in-market representation. They do not have the time or ability to respond to such a process. Whilst it could be argued that this is not the fault of the Department, the contributions to the consultation process will be all the poorer for it.

Feedback

SEN welcomes that DEED recognises there are challenges in the process and are leading initiatives to address some of these.

The document describes a top-down policy approach that lacks adequate public co-design, resulting in misaligned problem definitions and limited solutions.

Decisions are being made by officials without broader consultation with end users. The core problem is defined too narrowly within the current frameworks. Proposed actions miss the opportunity to address deeper structural reform.

There are numerous examples in the document:

“Making it easier ..” “Are there any other things that we should consider to improve DER data quality, collection and/or data flows”

This is generally from a systems or grid management perspective, not from an end user perspective as is evident from the seven proposals.

“ The process to redesign the DER connections will benefit from having clear regulatory obligations within the ESM Rules”

This is about existing rules, new rules and compliance fixing the problem. Whilst useful in context of the paper, it fails to uncover and address the issues industry and customers have with the current process.

“Home batteries deliver lasting cost of living relief for households and cut costs across the electricity system. Working VPPs are a core part of this, delivering secure and efficient operation in Western Australia’s isolated grid, which is built to handle peak electricity demand on just a few hot nights each year.”

The underpinning assumption is that VPPs are good for end customers through the common good principle. This also assumes the interests of the actors are aligned with end customers. The academic paper covering Project Symphony (Boyle et al “Invisible actions in the energy system: Examining power relations of virtual power plants in Australia using actor network theory”) highlights the problem that the issues paper fails to acknowledge and address.

“With better data and good system visibility ... this would create better pathways for business customers to install DER, which is critical to maximising our available roof space and energy storage and cutting the cost of doing business in Western Australia”

“Better data and good system visibility” are generally aimed at improving system operation rather than the issues faced by industry around the connection process. The most frequent one we hear about is unnecessarily long connection delays. Granted some of the solutions might be the same, however framing of the problem from an industry and end customer perspective is essential.

The investment business case for commercial and industrial users has not been addressed in the issues paper (i.e. answering the question “making it easier to connect solar, batteries and EV chargers”) - this would have highlighted the key issues businesses are actually facing.

Peak demand management and distribution network optimisation are key to the energy transition and public investment. Options exist for creative value sharing between network and end users.

Customer routes to market are generally via energy retailers which is not the case in the NEM and in other markets internationally. An example is battery optimiser businesses that trade available battery capacity and provide a revenue floor that is essential for debt funding.

Encouraging a more competitive dynamic will drive innovation and reduce the influence of dominant market players.

In addition to the seven proposals suggested SEN would like to see actions addressing:

1. Wider input into problem definition and proposed solutions - for example was the Western Australian Advocacy for Consumers of Energy Forum involved in the development of the issues paper? Was a survey or industry engagement completed?
2. Inequality in DER uptake in rentals, strata, social housing and low income housing similar to other schemes operating around the country;
3. Introduction of 'balcony solar' also known as plug-in or plug-and-play solar.

We hope you find our submission sufficiently interesting: we are happy to provide any clarifications and additional information as required.

Yours sincerely

Fraser Maywood

Chair, Sustainable Energy Now

Submission approved by the SEN Committee on 5th August 2026 by circular resolution

Sustainable Energy Now (www.sen.asn.au) formed in 2006 is a grass-roots not-for-profit member based advocacy group promoting renewable energy and decarbonisation. Supported by the best science and our own modelling and simulation, we advocate on how Western Australia can make a swift and orderly transition to clean renewable electricity safely, reliably, and affordably with commercially proven technologies.