

Energy Policy WA
Level 1, 66 Saint Georges Terrace
Perth, WA 6000

18 August 2026

Re: Making it easier to connect solar, batteries and EV chargers — Issues Paper on DER Data and Connections Reform

Dear EPWA Team,

Starling Energy Group Pty Ltd (SEG) submits this response to the consultation on the Issues Paper, Making it easier to connect solar, batteries and EV chargers, released by Energy Policy WA on 20 July 2026 (Issues Paper).

SEG is an experienced operator of aggregated residential distributed energy resources (DER) in Australia, with direct operational experience delivering Virtual Power Plant (VPP), Network Support Services, Supplementary Capacity, and Non-Co-optimised Essential System Services (NCESS). SEG are the creators of the Plico Project, the largest managed residential DER resource in the SWIS, with over 5,200 residential solar and battery systems under management.

This submission draws on SEG's operational experience as a DER aggregator in the SWIS, and on our earlier submissions. SEG sets out its position on each of the seven Reform Proposals and then compares the Issues Paper against Synergy's Third Party Aggregator Handbook of 1 July 2026 (TPA Handbook).

Our overarching conclusion is that the Issues Paper moves in the right direction. Standardised DER data, a distribution system operator with clear statutory data functions, and published network capacity information are all measures SEG has advocated for. That support is conditional on a single point of design: the data must flow directly and reciprocally to aggregators, rather than reaching the market through a single intermediary. Where the reform stops short of that, it will entrench the information asymmetry it is intended to cure.

SEG would welcome direct engagement with Energy Policy WA, Western Power, AEMO and other relevant bodies on any of the matters raised in this submission.

Regards,

George Martin

Chief Technology Officer
Starling Energy Group Pty Ltd

Executive Summary

The Issues Paper proposes seven Reform Proposals across three principles: improving the quality of standing DER data, making it easier for businesses to connect larger DER, and improving visibility of virtual power plants (VPPs). The reforms are to be given effect through an exposure draft of the Electricity System and Market Rules (ESM Rules) later in 2026, with no obligations falling on business DER before 1 January 2028.

SEG supports all three principles and supports six of the seven Reform Proposals substantially as drafted. SEG's concerns are narrow but consequential and concentrate on who receives the data the reform creates, and on the metric by which VPP capacity is to be measured.

SEG identifies the following matters as material:

- Data must reach aggregators directly: Reform Proposals 2, 5 and 7 create valuable data. If Western Power's obligation can be discharged by providing that data to a single retailer or Parent Aggregator, the reform reproduces the asymmetry SEG has already experienced rather than resolving it.
- Existing fleets must be grandfathered: SEG supports CSIP-AUS for new installations, but does not support any retrospective requirement for customers with existing non-CSIP-AUS inverters to install a gateway or have an OEM device removed as a condition of upgrading.
- Publication must be granular and machine-readable: an obligation satisfied by periodic aggregate documents would leave aggregators no better placed to target recruitment than they are today.
- The controllable capacity metric requires specification: it must accommodate AC and DC coupled fleets and realistic operating conditions, and aggregators should submit it directly to AEMO and Western Power.
- The Issues Paper and the TPA Handbook are inconsistent: the two documents diverge on the definition of a VPP, on the capacity metric to be reported, and on the architecture through which data reaches aggregators. These divergences should be resolved before the exposure draft is settled.

Priority Recommendations

1. Adopt the three reform principles, and proceed with Reform Proposals 3, 4, 5 and 7 substantially as drafted.
2. Grandfather existing DER fleets under Reform Proposal 1 and preserve aggregator access to asset management data beyond telemetry.
3. Draft Reform Proposal 2 so that Western Power's data-sharing obligation runs directly to registered aggregators on equivalent terms, extending to dynamic operating envelope information and to feeder and substation NMIs where a reasonable need is established under the Metering Code.
4. Specify in Reform Proposal 5 that network capacity information be published at feeder level, on a defined refresh cycle, in a machine-readable and self-service format.
5. Refine the controllable capacity measure in Reform Proposal 6 and allow aggregators to submit that data directly to AEMO and Western Power.
6. Reconcile the Issues Paper with the TPA Handbook before the exposure draft is settled and confirm which instrument prevails.

1. Response to the Reform Proposals

SEG's position on each of the seven Reform Proposals is summarised in the table below. Detailed observations follow on those proposals where SEG's support is conditional, or where the drafting requires refinement.

Proposal	Summary of the proposal	SEG response
RP1	Mandate CSIP-AUS (v1.2 / SA TS 5573:2025) for inverters up to 30 kVA.	Support for new installations. SEG does not support any retrospective requirement for owners of existing non-CSIP-AUS systems to install a gateway or have an OEM device removed.
RP2	Give Western Power statutory functions to collect, validate and share DER standing data.	Support, conditional on the sharing obligation running directly to registered aggregators and not solely to a retailer or Parent Aggregator.
RP3	Collect data on Level 2 and Level 3 EV chargers indirectly.	Support. Registration and reporting obligations should be kept low-barrier.
RP4	Standardised data and a lower-cost connection pathway for larger DER, extending toward 200 kVA and up to 1 MVA.	Support, including the longer transition periods contemplated for larger systems.
RP5	Require Western Power to publish forecast and historical network capacity.	Strongly support. The rules should require feeder-level, machine-readable and self-service publication.
RP6	Define a virtual power plant and collect controllable VPP capacity data.	Support the concept. The metric, point of measurement and the submission pathway require refinement.
RP7	Link published network capacity to VPP and EV siting opportunities.	Support. Delivery should be outcomes-based and self-service.

Observation 1.1 — CSIP-AUS for Inverters up to 30 kVA (Reform Proposal 1)

SEG supports mandating CSIP-AUS for new installations. Interoperability at the inverter level is in the interests of aggregators and customers alike, and it reduces the vendor lock-in that has characterised parts of the market to date. SEG's concern is confined to the treatment of existing systems.

SEG does not support any requirement for a customer with an existing non-CSIP-AUS compatible inverter to install a gateway, or to have an existing original equipment manufacturer device removed, as a condition of upgrading their system by adding a battery or a larger inverter. That requirement exists today only where the WA Residential Battery Rebate Scheme is claimed, and it should not be generalised, in fact, SEG would go as far as saying this requirement should be abolished as it adds unnecessary cost, complexity and waste. It is not conducive to improve industry productivity.

Critical Items — Reform Proposal 1

- Customers face an additional cost for the purchase and installation of a gateway.
- The gateway replaces the existing OEM smart meter, into which SEG is already integrated and from which SEG receives both telemetry and asset management data. SEG would incur further cost to integrate with each gateway listed on the Synergy Support Solution list, which SEG would like to highlight as a pseudo CEC listing – also not contributing to industry productivity.

- Even once integrated, the data available from a gateway is telemetry only (and may be wildly inaccurate depending of method of integration between inverter and gateway). It is not the asset management data required to manage a fleet.
- Fix required: grandfather existing fleets, preserve aggregator access to data beyond telemetry, and give industry clear direction on where installer liability starts and ends when a non-compliant smart meter is removed and replaced with a gateway. The current guidance is still too vague.

Observation 1.2 — Western Power's Data Collection and Sharing Functions (Reform Proposal 2)

SEG supports giving Western Power, as distribution system operator (DSO), clear statutory functions to collect, validate and share DER standing data. Accurate data is directly in the industry's interest.

That support is conditional on the sharing obligation running to aggregators directly. SEG's experience under the Parent Aggregator model, set out in our response to the Tranche 9 DER Consultation Paper, was of information asymmetry between the Parent Aggregator and third-party aggregators, availability payments forfeited through lag in data transfer, and a refusal to share feeder and substation NMIs even where the Metering Code permits sharing on the basis of reasonable need. SEG does not raise that history to reopen the Parent Aggregator question, which the Issues Paper does not canvass. It is relevant because the same data flows are now proposed to be given a statutory basis, and the design choices made here will determine whether those problems are cured or entrenched.

Critical Items — Reform Proposal 2

- The obligation should name registered aggregators as recipients on equivalent terms, not solely a retailer or Parent Aggregator.
- Fix required: extend the obligation to network capacity data, dynamic operating envelope information, and feeder and substation NMIs where a reasonable need is established under the Metering Code.

Observation 1.3 — Publication of Network Capacity Information (Reform Proposal 5)

SEG strongly supports this proposal, which addresses the transparency problem at its source. Capacity information should be published at feeder level, on a defined and predictable refresh cycle, and in a machine-readable, self-service format. Aggregate figures released periodically as documents would satisfy a bare obligation while leaving aggregators no better able to target recruitment or size a service offer than they are today.

Observation 1.4 — VPP Definition and Controllable Capacity (Reform Proposal 6)

SEG agrees that nameplate rating is a poor proxy for the capacity a VPP can deliver and supports the move to a controllable capacity measure. SEG asks that the measure be specified with care. It must accommodate both AC and DC coupled fleets, and it should reflect the capacity available under realistic state-of-charge and customer-preference conditions rather than an instantaneous theoretical maximum. SEG would welcome the opportunity to work with EPWA and AEMO on the definition. On the mechanics, SEG asks that aggregators be able to submit controllable capacity data directly to AEMO and Western Power. A reporting obligation discharged through a third party adds latency and creates a further point of intermediation, which is the opposite of the visibility the proposal seeks.

Critical Items — Reform Proposal 6

- Specify the controllable capacity metric, along with point of measurement, permit direct submission to AEMO and Western Power and review the registration burden associated with the Alternative Electricity Services pathway so that the reporting obligation does not become a barrier to entry for smaller aggregators.

2. Consistency between the Issues Paper and the TPA Handbook

Synergy published the TPA Handbook on 1 July 2026, nineteen days before the Issues Paper. The Handbook records that the ESM Rules and the TPA Model Contract prevail over its own definitions, so the divergences below are best understood as the Handbook not yet having been reconciled with the reform direction rather than as deliberate conflict. They nonetheless require resolution, because the Handbook is the document third party aggregators operate to today, and several of the divergences go to data definitions on which compliance testing will turn.

The material inconsistencies are set out below.

Issue	Issues Paper	TPA Handbook	Consequence
Capacity metric	RP6 observes that nameplate rating may not reflect actual injection capacity and proposes a controllable capacity measure.	Section 5.8 and test TPA-03 collect <code>rtgMaxW</code> , the rated maximum watts, consistent with previous NCESS contracts.	The Handbook standardises on precisely the metric the Issues Paper identifies as inadequate for planning.
Data-sharing architecture	RP2, RP5 and RP7 direct Western Power to share capacity and network data broadly, noting that no mechanism exists to share network information with all aggregators and that participants should be able to self-serve.	Sections 5.3, 5.7 and 5.11 route AEL and DOE information and network constraint visibility to the TPA via Synergy and require all communications to the Head Contractor to pass through Synergy.	The Issues Paper leans toward direct DSO-to-aggregator data flow (preferred); the Handbook holds Synergy as the sole conduit.
Neutrality	A DSO-direct data model reduces reliance on the retailer as gatekeeper.	Section 4.1 describes Synergy as a neutral party whose role is limited to coordination, while Synergy remains the sole Parent Aggregator and a mandatory pass-through for communications.	The Issues Paper's data direction sits awkwardly with the Handbook's neutrality claim and with SEG's operational experience.

3. Conclusion

The Issues Paper moves in the direction SEG has argued for in successive submissions. Standardised data, a distribution system operator with clear statutory data functions, and published network capacity information would materially improve the ability of aggregators to plan, recruit and deliver services in the SWIS.