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Energy Policy WA
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EPWA CONSULTATION: MAKING IT EASIER TO CONNECT SOLAR, BATTERIES AND EV CHARGERS – ISSUES PAPER ON CONNECTIONS AND DATA QUALITY FOR DISTRIBUTED ENERGY RESOURCES

Synergy welcomes the opportunity to provide feedback on Energy Policy WA's (EPWA's) *Making it easier to connect solar, batteries and EV chargers – Issues paper on connections and data quality for distributed energy resources (Issues Paper)* released for public comment on 20 July 2026.

Synergy supports the overarching intent of the reform principles and proposals within the Issues Paper to improve connections information, and data quality and availability as a critical enabler of Distributed Energy Resources (DER) aggregation at scale. However, Synergy considers that further information is required to enable stakeholders to understand the outcomes of this work, including core benefits and alignment with the State Electricity Objective¹ This is particularly important should Market Participants face increased fees for development of implementation of this work program while the future value streams of DER are still under investigation.

Synergy also considers several proposals require clarification and with areas requiring further information outlined in the submission.

Synergy thanks EPWA for commencing discussion on these challenging but critical items and looks forward our involvement in further consultation on these items through to detailed design and implementation.

Yours sincerely

A handwritten signature in black ink, appearing to read "AK", followed by a period.

ANNABEL KEOGH
HEAD OF POLICY AND SOCIAL VALUE

¹ Refer [Electricity Industry Act 2004](#) section 3A.

Please find further commentary on the individual proposals and questions posed by the EPWA in the Issues Paper below.

1 INCREASING DER STANDING DATA

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

Synergy considers this a positive movement in supporting interoperability within the South West Interconnected System (**SWIS**). To futureproof the approach, Synergy suggests moving away from a point in time reference to a version of CSIP-AUS and instead requiring DER devices to be compliant with SA TS 5573. This would provide a clear signal to industry that the SWIS intends to align with the national approach for technical standards on DER remote management capabilities.

Synergy is supportive of introducing this proposal and requests confirmation that the requirement will be clearly articulated and enforced through an updated version of the WEM Procedure for Technical Requirements for Standard Small User Facilities (**WEM Procedure**)². Pending the implementation method, Synergy considers clarification is required on which entity will have the obligation to ensure installations are compliant with this requirement.

1.2 Proposal 2 – Distribution System Operator (DSO) functions to collect, validate and share data

Synergy supports Western Power holding the role of DSO and its recommended functions as part of this process. However, Synergy requests further engagement and transparency is provided in developing and determining the implementation approach for this proposal. This includes further details on any planned costing, funding structure and cost pass throughs for this proposal and the opportunity for further detailed discussion on impact on Market Participants.

A key area requiring further clarity on this proposal is data governance and management processes, including data access rights, use cases, and protection and security. Synergy notes that, as the data requirements evolve, there may be benefits for customers if they were able to access the information, potentially leading to better personal optimisation. Should the sharing of data progress in this manner, considerations regarding the Security of Infrastructure Act 2018³ (**SOCI**) would be required.

1.3 Proposal 3 – Indirect data collection for electric vehicle chargers

Synergy understands the reasoning for seeking greater visibility of Type 2 electric vehicle supply equipment (**EVSE**) particularly with the current and forecast uptake of Electric Vehicles (**EV**) and chargers. However, Synergy considers the outcome EPWA is attempting to achieve through this proposal may be challenging, in terms of cost and data quality, while maintaining low barriers to entry as outlined in the Issues Paper. On this basis, Synergy would caution against implementation of any such scheme without undertaking a full cost benefit analysis.

² <https://www.westernpower.com.au/4902bd/siteassets/documents/community-consultation/wem-procedure-technical-requirements-for-standard-small-user-facilities-clean.pdf>

³ <https://www.legislation.gov.au/C2018A00029/latest/versions>

Regarding vehicle to grid (**V2G**) chargers, Synergy recommends that V2G chargers are captured under the WEM Procedure (via the term “Inverter Energy System”) and as part of the updated connection process. This would allow data to be collected under existing processes, removing the requirement to implement further data collection provisions and processes. Synergy requests confirmation that V2G chargers are captured under the term “inverter Energy System” as defined in the WEM Procedure.

2 MAKING IT EASIER FOR BUSINESSES TO CONNECT DER

2.1 Proposal 4 – Standardised data to create an easier connection pathway

Synergy supports actions which will improve the connection pathway, particularly in relation to commercial solar assets that currently face a connection timeline of up to two years. Currently the connections process is separately being reviewed by the Project Jupiter partners with the assistance of an independent consultancy firm. Synergy would value further information on how the items raised in this Issue Paper align with work being undertaken by the Project Jupiter partners, ensuring these programs drive complementary and aligned outcomes.

Synergy highly supports standardisation of communication protocols however flags that larger systems (e.g. greater than 200kVA) can have different data requirements which may not align with CSIP-AUS. Synergy suggests that implementation of Proposal 4 be live to the potential limitations of CSIP-AUS should there be expectations of its application to commercial solar assets.

2.2 Proposal 5 – Requirements to share network capacity

The Economic Regulation Authority (**ERA**) published its draft decision on the Access Agreement 6 (**AA6**)⁴ as part of the current review cycle. This document outlined that Western Power would be required to publish information previously not available to stakeholders as well as develop, publish and implement connection and DER/DSO strategies. Synergy seeks clarity from EPWA as to how the AA6 mechanisms and Proposal 5 interrelate to enhance alignment on core outcomes.

3 BETTER UNDERSTANDING HOW VPPS MITIGATE GRID IMPACTS AND MAXIMISE OPPORTUNITIES THEY CAN DELIVER

3.1 Proposal 6 – Explore mechanism for virtual power plant (VPP) operators to provide simple capacity data

Synergy supports exploration of this mechanism for VPP operators with this data being useful to the market operator as the industry continues to scale. Synergy suggests this data may be beneficial in a broader sense and seeks clarity as to which entities in the energy ecosystem will have access to the data, noting that retailers, that are not aggregators, would not require the same level of information as opposed to an aggregator or the market operator.

⁴ <https://www.era.gov.au/access/electricity-access/western-power-network/network-access/access-arrangements/framework-and-approach-aa6-2027-2032>

Synergy understands the most direct manner to collect the suggested data is through the National Metering Identifier (NMI) however the current drafting of the Metering Code⁵ is understood to present barriers to publication. Synergy seeks clarity on how EPWA intends to overcome the barriers presented by the Metering Code to share this data and whether regulatory changes will be recommended.

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

Synergy supports this proposal and considers that it is a positive step toward the sharing of information that may be beneficial to the industry. It is recognised that Western Power's interactive network opportunity map (iNOM) is a valuable tool that could be used to better assess areas of interest, particularly for aggregators. However, Synergy suggests the data visually displayed on the iNOM is made available to download in a numerical format as it may enable stakeholders to undertake further analysis to assist with VPP project developments. To further assist and develop the accuracy of information, Synergy suggests Western Power publishes network topology. Synergy also notes that the ERA's draft AA6 Framework and Approach decision recommends Western Power to publish prudent discounts⁶ in its annual network opportunities map, however this will not occur before commencement of AA6 in 1 July 2028. Considering the likelihood of costs to Western Power associated with further development this proposal, Synergy suggests that Western Power publishes the cost reduction they experience due to existing network support services. Should the cost reduction be outweighed by the cost of developing the suggested data sharing capabilities then it would be challenging for Synergy to support its progression. Furthermore, Synergy suggests it would be beneficial to understand how Western Power estimates the network value of VPPs reducing network costs across the associated supply chain. This cost reduction if passed to market network users may enable network users to further incentivise their customers to deploy DER.

4 ADDITIONAL COMMENTARY

4.1 EPWA Questions

4.1.1 Are there any other things that we should consider to improve DER data quality, collection and/or data flows?

Synergy broadly considers EPWA's data proposal sensible however there is limited detail provided throughout the paper as to the outcome that EPWA is attempting to achieve and how it benefits all participants. Synergy recognises Market Participants, and their customers, may fund a material portion of the development and operational costs for the proposed changes but cannot easily identify a mutual benefit to warrant supporting an unknown cost. Synergy requests further information is published on the anticipated costs and the direct benefits received by participants that would be liable for funding. It is suggested this is completed in the form of a cost/benefit analysis.

Synergy understands this is the initial consulting phase of a larger piece of work however there is limited information on implementation which would be beneficial in developing positions on the proposals. Additionally, Synergy requests additional information on any potential integration requirements for Market Participants because of any outputs from this paper.

⁵ <https://www.westernpower.com.au/resources-education/manuals-guidelines-and-standards/metering-code/>

⁶ Western Power is required to provide distributed generation or other non-network solution reference services under its current approved access arrangement (AA5). These services provide a discount on the standard tariff if the distributed generation or other non-network solution results in Western Power's costs reducing. Synergy has not been able to obtain a prudent discount for its DER activities to date.

4.1.2 How well do data sharing and connection processes work for different stakeholders, like consumers, DER installers, electricity retailers, and potential VPP aggregators?

From a Synergy perspective, the current systems are unable to deliver the required output as there is limited systematic transfer of information paired with a connections process that requires development in order to align with the new environment. Currently, data requests are manual processes that vary in size and time as there are challenged in developing standardised reports without defined and set parameters. Synergy recognises the requirement for a form of data exchange however it advises that careful consideration is made with firm goals that guide development.

The connections process is currently undergoing a significant development, separate to the work proposed in the Issues Paper. Based on Synergy's involvement in the reworking of the connections process and its experience, this a summary of the key challenges identified:

- Customer and installer journeys are fragmented across multiple systems, organisations and touchpoints, making the process difficult to navigate and understand.
- Limited visibility of application status, approval conditions and next steps create customer, installer and retailer frustration.
- Information is captured multiple times by different parties, increasing administrative effort, duplication and the risk of inconsistent data.
- Significant manual processing and validation activities remain across the connection lifecycle, reducing efficiency and scalability.
- Data quality can be inconsistent due to multiple data sources, varying formats and limited validation at the point of capture.

4.1.3 Will proposals in this paper broadly help to increase DER uptake and participation, by making it easier to install or upgrade systems?

Greater DER data provision and quality will likely improve DER connection decision making and management from a range of different Market Participant perspectives. However, better data in isolation will not deliver substantial uptake in DER deployment as more structural issues need to be addressed, in conjunction with data provision, specifically the sharing of DER network benefits to the end use customer when DER reduces network spend.

Synergy considers the achievement of Proposal 4, as outlined in the Issues Paper, will provide the most benefits to assist in increasing DER uptake and participation. Standardising data and creating an easier connection pathway, that may materially reduce the processing time of a commercial asset connection, may encourage greater participation and new entrants. The current timeframe of up to two years creates a barrier to entry and this may be eliminated through the proposed changes.

Further DER uptake and participation may be encouraged through greater visibility of where network constraints exist and, more importantly, the value available to mitigate the constraint. If this network value was shared with Market Participants, it would enable them to share that benefit with their customers to incentivise further DER take up. To pursue this direction, it would be beneficial for Western Power to publish the network value of locational constraints available, as part of the iNOM, assisting Market Participants in tailoring their customer offerings in particular areas. This is an approach would be consistent with the State Electricity Objective.

4.1.4 Are there parts of the DER connection process we should pay specific attention to as part of the reform work?

Synergy notes the connections process is currently undergoing development work in a separate forum to that of the proposals raised in the Issues Paper. Synergy's view is that the greatest opportunity is not any single process change, but establishing a more integrated, transparent and value driven end-to-end lifecycle that improves the customer/retailer experience, supports compliance obligations, enables effective data sharing and provides a platform for future DER opportunities. Synergy has outlined the data related points below:

- Application, assessment and approval
 - Many existing customer, installer and retailer pain points occur during application and assessment.
 - Focus on reducing duplication, improving transparency of application status, and enabling data to be captured once and shared across participants.
- Install and commission
 - Clearer definition of compliance requirements is needed to support a consistent commissioning process.
 - Data collected during installation and commissioning should support downstream registration, compliance monitoring and operational use cases.
- Approve and register
 - Registration should establish a reliable, authoritative source of DER information that can be reused across participants and future DER initiatives.
 - Data sharing arrangements should be designed to support multiple objectives, including compliance, customer service, dynamic connections and market/VPP participation.
 - Avoid creating duplicate reporting, registration or data submission requirements where information already exists elsewhere in the process.
- Operate
 - Ongoing compliance should be treated as part of the end-to-end DER lifecycle rather than a separate activity occurring after connection.
 - Reform should consider how data collected through the connection process supports ongoing compliance monitoring, dynamic connections and future DER orchestration capabilities.
 - Agreement is required regarding how compliance is assessed, and what information must be exchanged between participants.
- Decommission
 - The process and data capture should account for changing customer circumstances, upgrades, replacements, product changes and eventual decommissioning of DER assets.
 - Accurate updating of DER records should be maintained throughout the asset lifecycle to preserve data quality and support future planning and compliance activities.

4.2 Regulatory Design

Industry stakeholders would benefit from greater visibility of EPWA's proposed regulatory design in terms of making it easier to connect solar, batteries and EV chargers. In that regard Synergy advocates EPWA publishing a regulatory design or map that details how its change proposals will:

- a) be implemented and administered with respect to applicable retail, network access and wholesale regulatory instruments; and
- b) provide role clarity between regulator, market participant, market operator, network operator and distribution system operator.

5 SUMMARY

In summary, Synergy supports the intent to create a single, consistent, and high-quality data sharing platform that will enable improved communications between participants, the DSO and market operator. However, based on information provided in this paper, Synergy encourages that further consultation be undertaken to develop an enhanced understanding of how connections and data improvements will support enhanced VPP delivery.