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Department of Industry, Science, Energy and Resources
Australian Government

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Renewable Energy (Electricity) Amendment (Small-Scale Renewable Energy Scheme Reforms and Other Measures) Regulations 2021

AGL Energy (**AGL**) welcomes the opportunity to comment on the Renewable Energy (Electricity) Amendment (Small-Scale Renewable Energy Scheme Reforms and Other Measures) Regulations 2021 (**Proposed Amendments**), that seek to address the Australian Government's response to the Integrity Review of the Rooftop PV Sector.

AGL is one of Australia's leading integrated energy companies and one of the largest ASX listed owner, operator, and developer of renewable generation. AGL is also a significant retailer of energy and telecommunications with 4.5 million customer accounts across Australia. Upon completion of our acquisition of Solgen and Epho in 2021, AGL will become one of Australia's largest commercial solar providers. AGL is also a market leader in the development of innovative products and services that enable consumers to make informed decisions on how and when to use their distributed energy resource (**DER**) assets to optimise their energy load profile and better manage their energy costs. Our current DER product and service offerings include our Virtual Power Plant¹, our retail offer for electric vehicle owners² and our recently launched solar orchestration offer, Solar Grid Saver.³

AGL's position

AGL supports the Proposed Amendments to address the Australian Government's response to recommendations made in the Integrity Review of the Rooftop Solar PV Sector that aim to give the Clean Energy Regulator (**CER**) powers to:

- Approve installer accreditation schemes;
- Tighten eligibility requirements for approved solar components;
- Require written statements from solar retailers; and
- Improve compliance and enforcement.

We agree that the Proposed Amendments will better protect consumers and improve integrity in the rooftop solar PV sector. As Australia continues to lead the world in rooftop solar PV uptake, these amendments will

¹ For further information regarding AGL's Virtual Power Plant, please refer to https://www.agl.com.au/solar-renewables/solar-energy/bring-your-own-battery?cide=sem-r&gclid=EAlaIqobChMlicjKmKuP5wIVyjUrCh2eXwVVEAAYASAAEgLRPD_BwE&gclsrc=aw.ds.

² See further, AGL EV Plan, available at <https://www.agl.com.au/electric-vehicles>.

³ See further, AGL Solar Grid Saver, available at <https://discover.agl.com.au/solar/helping-to-maximise-your-solar-savings/>.



improve consumer confidence, by providing important consumer protection arrangements to support strong uptake and participation in the emerging DER market. The recommendations also complement the policy direction articulated by the Energy Security Board (ESB) in its Post-2025 Market Design, towards encouraging and enabling consumers to be rewarded for their flexible demand and generation.⁴

With respect to the approval of eligible solar PV modules and inverters, we note the Proposed Regulations provide for approved lists to be maintained by the Clean Energy Council or a body nominated by the CER. We recommend the Proposed Regulations provide that the CER develop clear criteria for the content of any approval product lists that may be developed by third parties. In circumstances where there are approved lists maintained by the Clean Energy Council *and* alternative organisations nominated by the CER, we consider that the process needs to be consistent for installers and suppliers.

We consider the transitional provisions in the Proposed Amendments, including that *‘Existing accreditations provided under the Clean Energy Council accreditation scheme, would continue to be recognised. Such an accreditation would be recognised until either 31 December 2022, or 3 months after the Regulator has approved an accreditation scheme [...], whichever is later’* to be a reasonable timeframe for industry to transition towards the revised regulatory framework.

Should you have any questions in relation to this submission, please contact Kurt Winter, Regulatory Strategy Manager, on 03 8633 7204 or KWinter@agl.com.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'K. Hristodoulidis', written over a light blue horizontal line.

Con Hristodoulidis

Senior Regulatory Strategy Manager

⁴ See Energy Security Board, Post-2025 Market Design Final advice to Energy Ministers Part A (27 July 2021), Available at <https://esb-post2025-market-design.aemc.gov.au/32572/1629944958-post-2025-market-design-final-advice-to-energy-ministers-part-a.Pdf>.