

Lodged via email to certaskforcecg@dcceew.gov.au

Department of Climate Change, Energy, the Environment and Water
Consultation on Technical Priorities of CER Roadmap

12 September 2025

Consultation on Technical Priorities of CER Roadmap - Consultation on Draft Prototype, CER National Technical Regulatory Framework

The Australian Energy Council ('AEC') welcomes the opportunity to make a submission to the Consultation on Technical Priorities of CER Roadmap.

The AEC is the peak industry body for electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. AEC members generate and sell energy to over 10 million homes and businesses and are major investors in renewable energy generation. The AEC supports reaching net-zero by 2050 as well as a 55 per cent emissions reduction target by 2035 and is committed to delivering the energy transition for the benefit of consumers.

Introduction

As an organisation representing those engaged in retail energy services, we recognise the importance of establishing a consistent, consumer-focused, and innovation friendly regulatory environment that supports safe, reliable, and cost-effective CER deployment.

The Draft Prototype, CER National Technical Regulatory Framework (the Draft) represents a material step toward harmonisation of technical standards, accreditation, and data visibility across jurisdictions. We support the objectives of the Draft but highlight several key considerations for both retailers and customers that we believe the AEC should take into account during consultation and implementation.

1. From Fragmentation to a Unified Code

We strongly support the establishment of a single National CER Technical Code to harmonise requirements across PV, batteries, inverters, EV chargers and communications protocols.

Fragmented jurisdictional requirements have raised costs, delayed deployment, and created consumer confusion. A unified code would reduce duplication in compliance and testing regimes, and enable development of nationally consistent product offerings. The Draft could further address harmonisation across jurisdictions amongst DNSPs and also uniformity of standards interpretation, such as those relating to CSIP-Aus. Where jurisdiction specific or DNSP specific deviations from the national framework exist then one of the key cost benefits of this reform, the economies of scale and scope from uniformity of technical requirements, would be lost.

The proposed two-year update cycle provides predictability, but also requires industry to

carefully plan compliance pipelines. Retailers will need adequate lead times and transition arrangements to avoid disruption.

Recommendations:

- To have any cost and effort reducing effect created by scale, harmonisation needs to be at a granular level. For example, each jurisdiction having its own regulation to address orchestration is a limited form of harmonisation. Each jurisdiction adopting identical technical standards is harmonisation that can produce an economic benefit.
- Ensure implementation schedules provide sufficient runway for industry adaptation, with coordinated consumer communication at each update cycle.

2. Accreditation: Raising the Bar

Accreditation of devices and installers should deliver tangible improvements in safety, workmanship, and accountability. However, new obligations such as mandatory CPD for installers and verification of installer accreditation by retailers and DNSPs will increase compliance and channel management costs. Retailers may need to invest in accredited installer partnerships or build networks themselves, potentially slowing product rollout.

Recommendations:

- Raise the bar by lowering barriers to entry. Implement streamlined approvals, simple compliance processes, and fair accountability settings. Lowering barriers to entry is not the same as lowering standards in safety, workmanship, and accountability.
- Program of work required with industry to ensure accreditation processes are streamlined, nationally consistent, and supported by accessible training pathways.

3. Data and Visibility Obligations

A nationally maintained Installed Device Register is central to the Draft, but lessons from the existing DER Register must be applied. The DER Register has become primarily a compliance tool with limited operational value, resulting in incomplete and lagging data. The utility of the new register hinges on real time access and functionality. Without this, it risks replicating the shortcomings of the DER Register.

Being realistic about the scope is important. If the Device Register includes CER upgrades for example then this would create obligations capturing OEMs, installers, and aggregators, and compliance will be complex. For aggregators specifically, it needs to be determined with them if it will be actionable to provide updates each time there is a change in a device setting for market participation.

Recommendation:

- Ensure the Installed Device Register can in practice provide a use and purpose beyond the existing DER Register. This requires further consultation on a timely, accurate, and operationally useful Register.

4. Orchestration and Consumer Offers

Embedding dynamic device management expectations into the Code creates a stronger foundation for retailer led orchestration services. This could unlock greater consumer participation through export payments, bill reductions through orchestration, and improved grid reliability. Retailers will require clear guidance on consent and reporting obligations, which must be balanced with the need to maintain simple, accessible customer experiences.

Recommendations:

- Responsive markets that promote innovation require dynamic regulation with regulators willing to adapt rules as technologies and business models evolve.
- Co-design orchestration compliance requirements with retailers and other participants to ensure they are necessary, proportionate, transparent, and consumer friendly.
- Continued pathways to open access and interoperability, with uniform technical standards that allow new entrants and products to plug in easily.

5. Building Consumer Confidence

Consumer facing tools such as accredited device/installer lists, complaint pathways, and educational guides are welcomed by Retailers. These can build trust if well designed in plain language and aligned with retailer communications. Past experience such as the Better Bills Guideline shows that poorly targeted consumer requirements risk adding cost without delivering value. As markets progressively scale up, it will be important to assess whether consumer confidence is also growing.

Recommendations:

- Customer empowerment through choice remains the priority. Customers can adopt and test innovative offers rather than be corralled into regulated solutions.
- Further collaborate to ensure consumer education materials are practical, consistent across channels, and enhance rather than restrict innovation. A “propose/respond” model is not the best approach here.

6. The Regulator’s Posture and Capabilities

The Draft signals a facilitative, guidance focused regulatory posture. If realised, this would support co-design, staged implementation, and education first compliance. However, past experience suggests such approaches can be perceived as slow or ineffective, leading to political and reputational risk for the regulator. The regulatory burden of this framework is significant.

The Draft also calls for the ideal regulator(s) to maintain independence and objectivity with existing regulated entities, while collaborating with them. We are concerned that this model may lead to overlapping responsibilities and increased costs, without a clear rationale for why it represents the optimal regulatory approach.

In our experience, further clarification is needed to justify the creation of a new regulatory body. In particular in terms of the benefits it would offer over expanding the scope of existing regulators. Given the scale and complexity of establishing a new entity, a comprehensive cost-benefit analysis should be prioritised, with particular attention to the financial implications and funding mechanisms required to support such a body.

Recommendations:

- Clear, consistent rules frameworks make for predictable posture that lowers uncertainty for investors and innovators. This is still true for guidance focussed regulation and compliance and is a preferred model in a dynamic environment.
- The framework should commit the regulator to transparent implementation milestones, staged compliance windows, and their proactive engagement with retailers to maintain credibility and confidence in the posture.
- A comprehensive cost-benefit analysis should be prioritised, with particular attention to the financial implications and funding mechanisms required to support such a body.

7. Compliance Burden or Market Opportunity?

For retailers and their customers, the Framework is both a compliance obligation and a platform for growth. If well designed, it can deliver safer, better-integrated CER products, reduce poor-quality installations, and increase consumer confidence.

Outstanding questions requiring clarification include the:

- Practical regulation of retailer led orchestration and DOEs.
- Cost and time burdens of accreditation.
- Real-time update functionality of the Installed Device Register.
- Scope of demand shifting devices (e.g. hot water systems, pool pumps).

Conclusion.

We support the objectives of the Draft Framework and the move toward a nationally harmonised CER regulatory environment. The success of the Framework will depend on ensuring:

- Accreditation processes are streamlined and accessible.
- The Installed Device Register is operationally valuable, not just a replicate compliance mechanism.
- Orchestration obligations are co-designed with industry and simple for consumers.
- Consumer education builds confidence without stifling innovation.
- The proposed regulatory posture balances facilitation with credible, staged enforcement.

We look forward to ongoing engagement to refine and implement the Framework in ways that support both consumer outcomes and sustainable competitive market development. Please contact David Markham at david.markham@energycouncil.com.au should you wish to discuss further.

Yours sincerely,

David Markham
Manager DER and Networks Policy