
From: Atkinson, Natalie (DEM) [REDACTED]
Sent: Thursday, 2 July 2020 10:42 AM
To: Kolacz, Miriam; Muller, Melissa (DEM)
Cc: Staltari, Danielle; Oster, Scott (DEM); Butler, Amy (DEM)
Subject: RE: Clean Energy Council – application for revocation of authorisations A91495 and A91496 and substitution of AA1000514 – interested party consultation [SEC=OFFICIAL]
Attachments: HBS Data_ACCC.pptx

Dear Miriam

Thank you for the opportunity to meet and further discuss the Clean Energy Transition division's submission in relation to the Clean Energy Council's application for re-authorisation of the Solar Retailer Code of Conduct (the Solar Retailer Code).

As requested in that meeting, we have provided some statistics in relation to the Home Battery Scheme (HBS) uptake and the level of installations that include solar (attached).

We also offer the following expanded information about the potential impacts on the scheme were the Solar Retailer Code authorisation to expire.

The current HBS System Provider criteria requires System Providers to:

"Either:

1. System Provider is a CEC Approved Solar Retailer; or
2. System Provider has committed to an acceptable equivalent Code of Conduct that has been authorised by ACCC."

(for complete criteria refer

https://homebatteryscheme.sa.gov.au/system/files/documents/System_Provider_Criteria.pdf):

As noted in our submission, it is intended that HBS system providers will be subject to the New Energy Tech Consumer Code (NETCC), once Solar Retailer signatories transfer across. However, as the NETCC is not yet operational, were the Solar Retailer Code to expire, it would be necessary for CET to find an alternative means of ensuring customer protections under the HBS.

CET is of the view that there is unlikely to be an existing alternative consumer code that is appropriate to the industry. However, were such a code identified, the process to authorise all existing HBS system providers under that code would be lengthy and administratively burdensome, and cause delays to the scheme's rollout.

It is more likely that the South Australia government would need to develop its own detailed consumer protection criteria consistent with the NETCC and regulate it. This could be expected to take some months, during which time the scheme would potentially need to be placed on hold, leading to reduced bill savings for participating households and electricity consumers more broadly.

This would have impacts for consumers seeking to access subsidised home batteries, and for the 130 businesses that are authorised as system providers. Additionally, the cost to implement this consumer protection criteria would need to be recouped from either the existing subsidy budget or, more likely, from each system provider. The cost of administering this arrangement is likely to be considerably higher than the current CEC membership fees.

I trust this additional information is useful and we invite you to contact Ms Melissa Muller, Project Manager, Home Battery Scheme, on [REDACTED] or email [REDACTED] if you would like to discuss in more detail.

Kind Regards

Natalie Atkinson

A/Executive Director

Clean Energy Transition

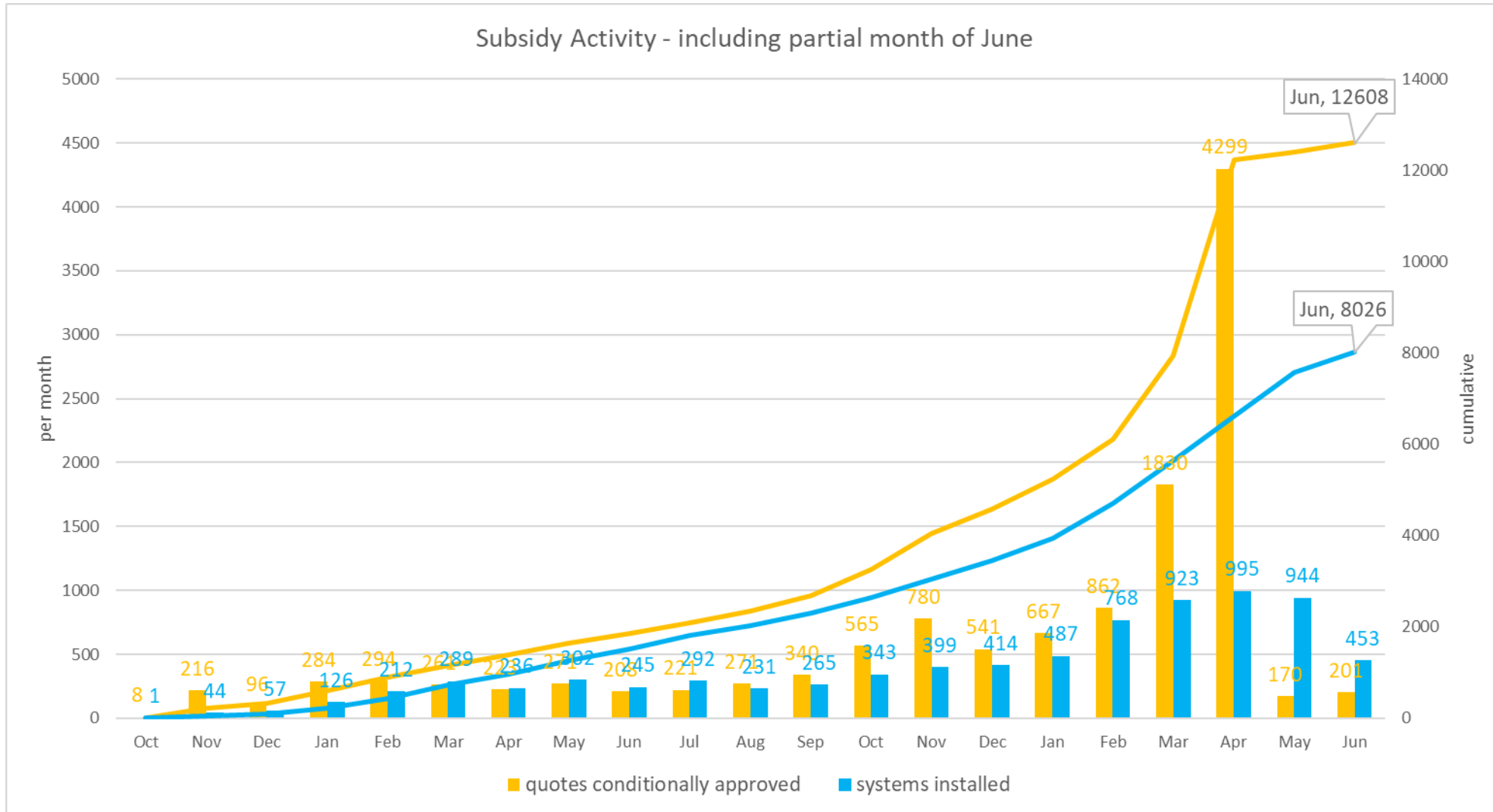
Department for Energy and Mining

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Home Battery Scheme Activity





Home Battery Scheme Activity

Estimated solar uptake

Approximately 40% of the subsidised batteries under the scheme received a quote for the purchase of solar, therefore it's assumed that in purchasing the battery, the solar is also purchased. This solar data is indicative only as it is based on a customer's quote records and we do not confirm whether the solar installation occurs as part of the subsidy application

Battery & New Solar



Battery & Upgraded Solar

