Department of Natural Resources, Mines and Energy  
Queensland Government

Email: energyreview@dnrme.qld.gov.au


I am writing on behalf of the Smart Energy Council (SEC) to provide our response on the Issues Paper regarding the Review of Queensland Energy Legislation.

**Smart Energy Council**

Tracing its history back to 1954, the Smart Energy Council is the peak industry body for the solar, storage and smart energy management industry in Australia.

With individual, small business and corporate members across Australia and internationally, we are the peak industry not-for-profit organisation committed to clean, efficient, cheap and smart energy solutions.

We help our 1000+ members drive industry forward and grow strong businesses by:

- Promoting smart energy policy and actively lobbying for our members
- Marketing, brand placement & promotion
- Providing timely market intelligence and actionable insight
- Connecting industry with potential customers and partners
- Training and professional development
- Keeping members up to date with industry standards
- Delivering member only alerts, events and networking

The SEC offer services through a range of registered training organisations including Future Skills Limited and Solar Training Centre which together provide training and accreditation in

- Design and install grid connect photovoltaic systems; and
- Design, install, maintenance and fault find for battery storage systems for grid connected photovoltaic systems.

The Smart Energy Council is responsible for the Positive Quality TM quality assurance program which promotes solar PV module (solar panel) brands that are...
proven to consistently meet a high standard of manufacturing quality. For more about Positive Quality TM please see
https://www.smartenergy.org.au/about#about

The Smart Energy Council has over fifty years’ experience in solar technologies and is committed to providing independent and bias-free third-party inspections.

The SEC offers and manages a program for training, professional development and accreditation of Smart Energy Council Master Installer. Master Installers are masters of solar system design and installation and must demonstrate their commitment to best practice, and compliance with the relevant standards and regulation. For more information regarding our Master Installers please see https://www.smartenergy.org.au/membership/master-installer-membership

The Smart Energy Council has also worked closely with energy market experts Global-Roam Smart’s BatteryFinder TM which is the most comprehensive database of battery storage system products available in the Australian market. For more information on BatteryFinder TM please see https://www.smartenergy.org.au/batteryfinder

Specific responses regarding the Issues Paper.
The Smart Energy Council are pleased to provide the following response:

Efficiency – The SEC notes that “Efficiency” is mentioned as one of the key considerations and criteria to be used in the assessment of whether the state-based legislation remains fit for purpose. (Department of Natural Resources, 2018) pp 9-10

Further the SEC is pleased to note that this review seeks to avoid unnecessary regulatory restrictions on competition. (Department of Natural Resources, 2018) pp 10

The issues paper refers to the Organisation for Economic Co-operation and Development (OECD), Competition Assessment Tool (Organisation for Economic Co-operation and Development (OECD), 2017) and we draw your attention to the OECD checklist question regarding impact of regulation on the number or range of suppliers.

“Does the regulation: grant exclusive rights for a supplier to provide goods or services”
**Recommendation 1**

The Smart Energy Council therefore recommends the government avoids the granting of exclusive rights to particular organization(s) for purpose of:

- approval of equipment items including PV modules (solar panels), power conversion equipment including inverters, energy storage items including battery storage and battery management systems; and

- training and accreditation of system designers, installers and inspectors; and

- participation of suppliers in Queensland Government renewable energy, energy storage and energy efficiency programs. eg Affordable Energy Plan and the Advanced Clean Energy Schools (ACES) program.

**In relation to Question 3.2 (Department of Natural Resources, 2018)**

**Price control**

Question 3.2: What options exist to improve the efficiency and effectiveness of price protections

The Queensland Government’s Uniform Tariff Policy (UTP) approach results in regional residential, small business and some large business customers paying electricity prices that are generally lower than the costs of supplying these customers.


The SEC notes the dramatic reduction in the cost of solar PV, energy storage and smart energy management systems over the past 5 to 10 year period.

**Recommendation 2**

The Council recommends that the Queensland Government give renewed consideration to deployment of solar hybrid power systems or microgrids (both stand-alone and grid connected) for purpose of reducing the cost of supplying electricity to regional customers and thereby reducing the cost of the UTP.

The SEC further argues that in many remote communities and fringe of grid sites the reliability and quality of electricity supply would be improved through incorporation of solar hybrid power systems.
We further note that the West Australian Power Utility, Horizon Power, has a number of programs and initiative which seek to encourage the distributed generation and energy storage including Renewable Energy Buyback Schemes which offer buyback rates which vary according to the cost of electricity generation and distribution in that town. For more information on the renewable energy buyback scheme please see https://horizonpower.com.au/solar/renewable-energy-buyback-schemes/

The SEC looks forward to working with the Queensland Government and continuing the constructive relationship with Energy Queensland and other stakeholders, as the peak industry body for the solar, storage and smart energy management industry, in the review Queensland energy legislation.

Please contact me should you wish to discuss these matters further. I can be contacted at [redacted] or on [redacted].

Yours sincerely

John Grimes
Chief Executive
Smart Energy Council

19 June 2018

References