ATTENTION:
Queensland Productivity Commission
PO Box 12112
George St, Brisbane,
QLD 4003

SUBJECT:
Enquiry into solar feed in tariff in Qld

DATE:
17/11/15

Hon. Commissioner,

Our company is a Sunshine Coast-based project developer providing innovative solutions in solar power and associated renewable energy projects. We welcome the QPC's enquiry into establishing a fair solar Feed-In-Tariff as we are very supportive of initiatives such as this that will assist in growing Queensland's solar and renewable energy industry.

Our comments and recommendations regarding this inquiry are as follows

1. **The Queensland Competition Authority 2013 Inquiry into Solar Feed-In Tariffs**
   - As an industry player we questioned the process and focus of the inquiry that was undertaken in 2013 and why it was done to benefit the network owners and retailers rather than the PV customers who generate and sell their excess solar electricity into the grid. This new, current inquiry is encouraging because it provides an opportunity to address what we consider to have been a major oversight of the 2013 inquiry.
   - Recommendation the new inquiry should hold the PV solar customer at the centre of its consultation not the grid owners or retailers.

2. **Legislative barriers**
   - Current legislation under the Manufactured Homes (Residential Parks) Act 2003 https://www.legislation.qld.gov.au/LEGISLTN/CURRENT/M/ManufHomeA03.pdf and the Retirement Villages Act 1999 https://www.legislation.qld.gov.au/LEGISLTN/CURRENT/R/RetireVillagA99.pdf present barriers to owners of large retirement village housing stock by preventing them from investing in PV solar systems and storage. This raises equity and fairness considerations.
     For example we have several potential clients (owners of retirement villages) who would like to invest in solar systems for their aged retirement tenants but are prohibited from charging a margin on electricity they provide their tenants. Even though solar power offers an opportunity to lower the cost of electricity supplied to their aged care tenants, owners of aged-care facilities are unable to recoup investment they may wish to make in solar PV because they are prohibited by law to charge more for electricity than it costs them to supply.
   - Recommendation: Examine and where possible propose changes to relevant current Queensland legislation to address inequity issues.

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3. **Current accreditation requirements**
    - Current practices that only allow individuals with a Queensland electrical licence to become accredited solar PV installers stifles innovation and limits efficiency gains. Currently only licensed electricians are permitted to do the necessary CEC course to become certified and install PV solar systems. Prohibiting professionals such as electrical engineers, mechanical engineers, electronics engineers, researchers, plumbers, fitters, inventors and entreaupreneurs from doing installs inhibits innovation, limits technology gains available such as automation and electronics. We believe maintaining this status quo will prohibit efficiency gains, productivity gains and prevent potential subsequent cost/price reductions.

    - Recommendations: We propose replicating the Californian model (http://www.nabcep.org/) whereby individuals, not limited to licensed electricians, are permitted to become accredited and to allow parallel procedures and pathways whilst still ensuring occupational health and safety as well as quality standards are maintained and not compromised. This approach has the potential to deliver more innovation, R&D, lift standards of sales professionals and, we believe, put downward pressure on prices for people wanting to install solar PV, Thermal and small scale wind. Please see attached NABCEP Handbook, pages 3 and 4 are of particular relevance.

4. **Smart metres**
    - Some technological obstacles experienced by Energex and Ergon that need to be considered in determining a new FIT revolve around a model for net metering V' gross metering and installation of smart metres may be beneficial. Many of these issues have already been faced and overcome by grid operators in Europe and the US but solutions have not been limited to just installing smart metres.

    - Recommendations: broaden the scope to also include smart grids, mini and micro grids, private/public investment in embedded generators in future medium and high-density residential developments in order to develop a more robust policy framework and grid network utilizing public/private investment.

Thank you for the opportunity to provide the above comments and please do not hesitate to contact me should you require any further information or clarification regarding any aspect of this submission.

Yours sincerely

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