



Hello,

My name is Kon Flaherty director of Green Energy Technologies in Northern QLD.

We operate in the Ergon network and cover from North of Townsville to South of Mackay.

We employ 20 local staff from within these regions.

We would like to submit a response to represent our clients on 44c who would amount to over 3000 in this region.

The proposed amendment to the legislation below. We do not believe has been delivered with the correct amount of care or consideration to real scenarios. The proposed item we do not feel takes these items into consideration is.

i) add generation capacity to their qualifying generator which exceeds the output of their system's inverter (i.e. oversize)

Oversizing example from report:

A Solar Bonus Scheme customer has a solar power system with an inverter with a rated output of 5 kilowatts (kW), but has installed 16 panels each with a peak capacity of 250 watts (W)—a total peak generation capacity of 4000 watts, or 4kW. The customer may add an additional 1kW of generation capacity (i.e. 4 x 250W panels) and remain eligible for the Solar Bonus Scheme. However, if the customer adds more than 1kW of extra capacity, (i.e. more than 4 x 250W panels) they would become ineligible for the Solar Bonus Scheme.

We would please ask for the following items to be considered.

Using the above example. If a system with an inverter of 5kw is now 10 years old and has 5kw of labelled panels installed. The actual ability of those panels to deliver after 10 years is reduced by a factor of up to 20%. This would mean the system owner would now have a panel array able to





deliver only 4kw not 5kw. This power reduction or ability for a panel to deliver over time is a guaranteed loss available from all panel manufacturers. On this note it could be argued that in real terms this change will legislate a guaranteed asset reduction over the life of the system. It would also debilitate the owner to re invest to ensure the system can deliver to its potential.

Renewable generation is not a fixed resource even though simple maths may make it seem that way. A solar panel will reduce in ability to deliver over time due to the fact it is a made item. It is not the sun and a guarantee of the renewable source. The solar panel is a tool to deliver the resource. The solar panel as a tool wears down and is not as effective over time.

The simplest, most effective and lowest cost solution to ensure the system can deliver to the expectation is not to replace the older panel with newer panels but to add a few extra to ensure the system delivers to its capacity.

Solar panels like people are unable to produce at the same vigor and effectiveness in a physical sense the older they get. This legislation will facilitate the old to be thrown out in favor of the new simply just because of the label.

Was the old panel working? Yes but not at its original potential. (once 250w now only 200w)

The industry standards are up to 150% of rated limit throughout the world and 133% in the Australian CEC guidelines?

There is also a very relevant point to highlight in regards to the actual people "people" who are on the 44c FIT. Those people, residents, citizens that are on the 44c FIT are on there because they took a risk at the early stages of the renewable energy industry and invested heavily into solar systems that in todays market would be ridiculous prices. It would be easy to look at solar prices now in the current market and state that those on the 44c are getting a crazy good deal. It would be also easy to look from outside in and want to make things "FAIR"

This is not fair. In essence those on the 44c went out on the front lines for the QLD Gov and proved the renewable case for this state. These people invested huge amounts of money, time, stress and



resources to decide to move ahead with these investments at the time.

They did so because they believed they were doing the right thing and investing into the future. This type of legislative change does not indicate that the Government or the industry appreciates the efforts and risks taken by these QLD residents. This type of legislation change indicates that the QLD government and regulatory bodies consider those on the 44c FIT to be swindlers and speculators looking to dodge the system. This again is not fair and it is not the correct way for a government representative or body to reward those who did take a risk on this scheme. Those who did put their best foot forward on the promise of a better future for themselves deserve better.

Again I would argue strongly that the following proposed change be removed or changed to represent industry standard conditions not restrictive conditions based on pre conceived ideas of people looking to take advantage of a QLD Government system they backed.

We would propose as a minimum. The current:

i) add generation capacity to their qualifying generator which exceeds the output of their system's inverter (i.e. oversize)

As a minimum this should be changed to reflect:

i) add generation capacity to their qualifying generator which exceeds CEC guidelines for the output of their system's inverter (i.e. oversize beyond CEC guidelines)

Regards,

Kon Flaherty
Director

