

From: [REDACTED]
To: [Public Works and Utilities Committee](#)
Subject: Submission: Electricity and other Legislation (Batteries and Premium Feed-in Tariff) Amendment Bill 2017
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Relevant Historical Background:

Motivated by Bligh Government incentives our Household back in 2008/9 had two Photo Voltaic (PV) system's professionally installed totaling 3.4Kw maximum output. These were connected to the Energex Grid. Both directed surplus Electricity back to the Grid for which we were paid the proscribed 44 cent/Kw hr. Solar Bonus Feed in Tariff (FiT) by the Electricity Distributor.

Nearly six years pass. July 2015. We were directed by the Electricity Distributor (Energex) to dramatically reduce our generation capacity into the 44 cent Kw. hr. Grid. By cunningly waiting until after an amendment to the original 2008 scheme had been made mid-way through 2012, Energex had been able to enforce a provision that would have held no prior consequence. Protest and appeal was made to Ministerial Office, Hon. Mark Bailey Minister at the time. A delegated reply was received from the Energy and Water Commission stating they would not 'Intervene'.

Current situation:

June 15th 2017. Minister Hon. Mark Bailey (same minister) looks set to further diminish or axe our remaining meager export of 44 cent FiT (now so called 'Premium') Solar Power into the Energex Grid.

Concerns over the retrospectively proposed 2017 Solar Rebate Amendment are:

In relation to Section 44A (1A) and SPECIFICALLY Section 360 (2) containing a so called EXEMPTION.

Minister Bailey proposes prohibiting 'over sizing' of PV modules (Solar Panels) for those not already 'over sized' by 15th June 2017. (At least for those wishing to maintain eligibility for 'Premium' tariff.)

By Minister Bailey's definition, after 15th June if not already 'over-sized', PV modules will not be allowed to exceed the rated output of the Inverter they are coupled to. By definition our panels easily over-clock the Inverter they are connected to, amusingly a direct legacy from Inverter down-size Energex forced on us back in 2015. It should go with out saying that our Inverter will not allow our panels to exceed Energex's maximum export into the Grid. For the record, since July 2015 this has been a very modest 1,100 Watts. It should also be noted the ability to over-clock our 'approved' Inverter is very limited. Maximum PV string voltage and current cannot be exceeded without risk of damage or destroying the Inverter itself. This gives a useful maximum over-clocking potential in a robust quality made unit of around 25%. (Energex advise me they will not approve use of newer Export Limit software Inverters for 'Premium' tariff scheme participants. I assume this is to thaw potential to massively over panel these units, but means smaller Inverters such as ours, which are no longer manufactured or refurbished, will be increasingly difficult to source on failure.)

Disturbingly on contacting Energex I am informed that they do not officially know the

out-put capabilities of the Solar PV panels attached to our roof. Nor apparently do they typically reliably know Solar out-put on other roofs. No doubt new installs will now be more carefully documented in the future! Historically interest has always been in the INVERTER as the systems bottle neck limiting the maximum export, when available, into the Grid. Energex until now has shown little interest in the average maximum that would be obtained over time by 'oversizing' panels. Therefore the Hon. Mark Bailey looks set to rely on information that is not even reliably available from the energy distributor. For our part, reliance on historical Installer documents (still in existence) that might otherwise act as proof of our Panel specification, form part of Invoices that were not held valid by the ministers office last time the distributor required our system be throttled (Inverter/Installer issues) to maintain our 'Premium' tariff.

My discussion with Energex involved them remotely viewing our installation, I assume with the help of Google Earth or the like. Our roof is expansive. Most of the North facing surface is littered with an assortment of around 38 PV panels originally installed to support the two 1.7Kw Grid tied Inverters back in 2008/9. This landscape has not physically changed since about 2010. From the street and from the point of view of an Energex employee our array of Solar Panels looks more impressive than its now feeble export to the Grid would suggest. But will all this end amicability with the Ministers intended amendment regards 'oversizing' into the Grid? Energex have already said they would be able to check our historical exports to their Grid and be alerted to any irregular pattern. (They skillfully waited nearly six years for an amendment change for this exact opportunity last time!) Our Household has already been bitten once by obsequious application of amended rules. For those like ourselves receiving the 'Premium' tariff, this method is fraught with potential for a cunning regulator looking for any excuse to minimize or disqualify an expensive 'Premium' Solar Bonus participant.

Take our actual example. Our PV panels have been operating now for about close to a decade. Despite marketing hype a twenty-five year out-put warranty is usually worthless. In the real world PV power delivery degrades over time. PV modules deliver maximum rated out-put only when new, and then only in ideal sunny conditions. Panels slowly die over time, eventually giving mediocre out-put even on a sunny day. Any cloud cover, in the early morning or evening or in winter sun, average performance only gets worse. Over-sizing can help mitigate this.

Unsurprisingly our PV panels have degraded since fitted in 2008/9 and our export to the Grid has now fallen to a Summer/Winter average of around 6 kilowatts a day. Unlike the average Queensland household with an average consumption of 15 kilowatts a day, we do not squander energy. Never the less this surplus 6 kilowatts into the Grid is still bugger all of what new panels could be capable of. This 6 kilowatts will only erode further as our elderly panels get worse, a situation to gladden the ministers financial aim I'm sure. Since the 'Premium' tariff scheme still has around eleven years to run I had soon expected to replace weakening existing panels with new. This will be expensive, new panels being ineligible for federal REC credits on our aging Inverter. This should be noted by those labeling a 44 cent green energy tariff 'Exorbitant' and easy money.

Under the Hon. Mark Baily's proposal, if fitted Energex will alert themselves to increased out-put of these new panels. Applying Section 44A (1A) of the ministers new bill we would have:

'Added generation capacity to (our) qualifying generator which exceeds the output of (our) systems inverter.'

Under Section 44A (1A) (a), This is grounds to terminate our 44 cent FiT eligibility. Assurances that this would not happen do not convince me otherwise. Our household has already fallen victim to the Energy regulators changing mood before, back in July 2015. Despite the Palaszczuk Governments apparent commitment to retain the scheme through to 2028, our household is a very real example of how genuine original participants have and are still being systematically and incrementally disadvantaged by a Clean Energy scheme that now seems to have morphed into a financial liability and an embarrassment for the Government.

Also under Section 44A (1A) (c), It seems we will not be able to operate our 3.8Kwatt AEG Petrol Generator 'on the same installation' (The exception would be when there is a Grid power outage). Doing so under this section will again risk our 'Premium' Solar tariff entitlement. Therefore the proposed legislation is ambiguous shortly after when it attempts clarification by stating that it and/or an 'additional generator or battery' can be attached to an electrical installation which is different to the one that (our) Solar Bonus Scheme qualifying generator is attached to.'

As Section 44A (1A) (c) clearly states we would be able to add these items but utilizing a different installation. 'Installation' is not defined but by my reckoning it would suggest being an 'installation' electrically isolated from the Grid and its electrically connected House circuits. But I could conceivably expect it would be able to exist as a separate and independent entity in the same dwelling, and not necessarily as an Installer circular seems to of interpreted, need to be in a separate Grid isolated garden 'shed' or the like.

But whether in the same dwelling or as a separate structure. Both clearly contradict the spirit of the 'Policy Objectives' in the amendments preamble. Where the intention is brazenly clear for the elimination of any additional electrical supply competition, whether it is isolated electrically or not. Be that competition additional Photo Voltaic, Fossil Fuel generator or Battery Storage. Given that, the actual wording of 44A (1A) (c) could be interpreted as either support of the Palaszczuk Governments November 2016 commitment to 'Not strip households of the 44¢ tariff if they connect battery storage technology.' , or the exact polar opposite.

But what has become crystal clear during my households on-going participation in this ill-conceived scheme, is the under-handedness we have been dealt through political slight-of-hand. Our local MP Ian Walker quipped back in 2015 of our original 2008 Solar Connection Agreement that as a legal document it didn't stand for much. With time and hindsight how very true and accurate his words have come to resonate.

For your appropriate and careful consideration,

Anthony Kerr

For A C & K J Kerr

