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19th June 2023

Jai Thomas
Coordinator of Energy
Level 1, 66 St Georges Tce
Perth WA 6000
Email: [REDACTED]

Dear Jai,

RE: Voluntary Code for Embedded Network Services in Western Australia

SwitchDin welcomes the development of the Voluntary Code for Embedded Network Services in Western Australia (WA). It is a practical way to better protect consumers on embedded networks in WA and a sensible first step toward a regulatory framework.

SwitchDin is an Australian energy software company that bridges the gap between energy companies, equipment manufacturers and energy end users to integrate and manage energy resources on the grid. SwitchDin's technology enables our clients to build and operate vendor-agnostic virtual power plants and microgrids, and to optimise performance across fleets of diverse assets. Founded in Newcastle NSW in 2014, SwitchDin now operates in all states of Australia, including in leading-edge distributed energy projects like Project Symphony, Simply Energy's national VPP, Flexible Exports (in SA and Victoria), and the Solar Connect VPP (NT), among others.

With a growing number of customers in embedded networks wishing to install rooftop solar, batteries, electric vehicles (EV) and other forms of consumer energy resources (CER), the impact of embedded networks on management of the grid should be considered. As an alternative to treating embedded networks as though they are medium-sized embedded generation, we recommend Energy Policy WA consider adopting the approach being trialed by SA Power Networks, which is introducing a flexible exports trial for small embedded generators that are clustered behind a common connection point.

Currently in SA, when a small embedded generator (SEG) application is lodged for connection of CER in an embedded network where the aggregate capacity of CER would exceed 30 kVA, it is treated under the Medium Embedded Generation (MEG) application process. The rationale is that the aggregate impact of rooftop solar in an embedded network is comparable to that of a larger installation. However, it presents a high barrier to connection compared with rules for SEG systems.

SA Power Networks is trialing a [process](#)¹ that allows customers to avoid the stricter requirements of the MEG application process if their embedded network is capable of flexible exports. This is expected

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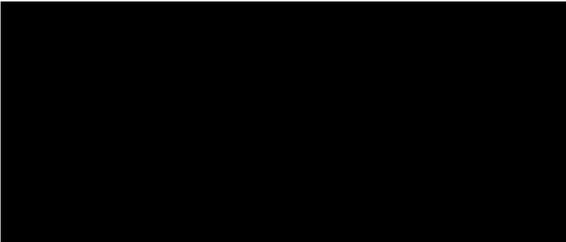
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to simplify the connections process and enable more solar exports while assisting with grid management.

We recommend Energy Policy WA use the Voluntary Code for Embedded Network Services as an opportunity to encourage new embedded networks to be ready to be 'flexible export ready' so that following the commissioning of utility servers using the Australian Common Smart Inverter Protocol (CSIP-Aus) protocol, they are able to conform to instructions for dynamic operating envelopes.

Thank you for the opportunity to respond to these important issues. I remain available for further discussions and inputs.

Best regards,



Andrew Mears PhD
CEO and Founder