



energy savings
Industry Association

**ESIA Submission:
Victorian Energy Upgrades (VEU) Program
ESC Consultation
New C&I Solar System Activity 47**

Due 16 October 2025

Submitted to the Victorian Essential Services Commission, Victorian Government,
via veu@esc.vic.gov.au

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1. Introduction

The Energy Savings Industry Association (ESIA) welcomes the opportunity to provide this submission to the **Victorian Energy Upgrades (VEU) Program Consultation New C&I Solar System Activity 47** which commenced on 2 October 2025. This consultation is being managed by the Victorian Essential Services Commission (ESC).

About ESIA

The Energy Savings Industry Association (ESIA) is the peak national, independent association representing and self-regulating businesses that are accredited to create and trade in energy efficiency certificates in market-based energy savings schemes in Australia. These activities underpin the energy savings schemes which facilitate the installation of energy efficient products and services to households and businesses. Members represent most of the energy efficiency certificate creation market in Australia. Schemes are established in Vic, NSW, SA and ACT. Members also include product and service suppliers to accredited providers under the schemes. As well, the ESIA represents member interests in national and state initiatives that include energy efficiency and demand reduction, such as the Federal Government's Carbon Farming Initiative energy efficiency methods and National Energy Performance Strategy, and the NSW Peak Demand Reduction Scheme.

Further engagement

We welcome the opportunity to discuss this submission further, please contact the ESIA Executive Director at comns@esia.asn.au.

This submission can be made public.

The consultation

The ESIA referred to the document at <https://www.esc.vic.gov.au/victorian-energy-upgrades/updates-reports-reviews-and-data/veu-reviews-and-consultations/consultation-guidance-and-administrative-requirements-commercial-and-industrial-solar-pv-system>

Timeline

The webpage states:

- Consultation opened – **2 October 2025**
- Consultation closes – **16 October 2025**
- Complete Review stakeholder submissions – **24 October 2025**
- Final guidance on record-keeping requirements – **29 October 2025**
- Release of program guides & accreditation application forms on ESC website – **31 Oct**

2. Response to Consultation Questions

Consultation questions – proposed training and competency requirements:

1. **Do you support the proposed training and competency requirements for solar system designers involved in this activity?**

Yes, the requirements align with other schemes that support these upgrade types.

2. **If you selected “No” to Question 1, please explain why the proposed solar system designer requirements may not align with current industry practices and suggest alternate designer requirements.**

N/A

3. **Do you agree with the proposed training and competency requirements for solar system installers involved in this activity?**

Yes and No.

The proposed training and competence requirements align with other schemes.

However, there may be some VEU requirement that are redundant.

4. **If you selected “No” to Question 3, please explain why the proposed solar installer system requirements may not align with current industry practices and suggest alternate installer requirements.**

An SAA Installer licence requires an Electrical licence and working at height as a prerequisite, therefore these requirements should not be required again under VEU.

Consultation questions – proposed record-keeping requirements:

5. **Do you support the proposed record-keeping requirements for this activity?**

Yes and No.

6. **If you answered “No” to Question 5, please specify which record requirement(s) you have concerns with and explain why.**

The proposed requirement for video footage is impractical. As well as potentially

putting installers at risk on site e.g. in adverse weather conditions or challenging physical conditions, video files can be difficult to upload e.g. from a site where reception or bandwidth is poor. Such video files of commercial installations could potentially be very large. Even smaller sites may present significant video file size challenges e.g. for upload to compliance platforms. Instead, the proposed requirement could be a combination of image/PDF files that provide proof that all the evidence requirements have been met. E.g. a still image /PDF of the portal webpage should be adequate to illustrate the monitoring system for the installation.

Clarity is sought on the proposed requirement of only one VEEC installation per NMI or per site? The requirement needs to be a reasonable reflection of what is found in the field, which can include more or less than one NMI per site.

The proposed requirement is suggesting where there are multiple installers on site, Selfie photos of each installer are required. This seems unreasonable and should be updated to align with CER requirements of a Selfie of the supervisor installer only.

Considering that the battery rebate is not covered as part of Activity 47, requiring battery details including name plates and serial numbers seems to be compliance evidence gathering overreach. There are mixed views on whether this is necessary.

The need, or not, for single line diagrams based on the system size needs to be clearly communicated and justified. There are mixed views of what is required and where this will or won't align with other regulators such as for STC versus LGC creation. Aligning the requirement with CER requirements where possible seems reasonable. In this case, for installation below 100KW there should not be a requirement for SLD, as this just adds to cost and ultimately reduces the financial benefit to the customer.

7. Do you have suggestions for alternate record-keeping requirements that would better support compliance with the activity requirements? Please list them if you do.

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8. Should the record-keeping requirements for validating systems differ based on system size (i.e. less than 100 kW vs. greater than 100 kW)?

Yes.

9. If you answered "Yes" to Question 18, please specify what different record-keeping requirements you believe should be set based on system size.

Emulate the Clean Energy Regulator requirements for consistency.

10. Do you support the proposed VEEC assignment form information requirements for this activity (see appendix A)?

No, not entirely.

11. If you answered “No” to Question 10, please outline what aspects of the proposed VEEC assignment form you believe should be amended.

There are mixed views in the ESIA membership about a reasonable approach. Some consider that the AP should sign off to say that everything is true and that false information has not been provided. However, others consider that it should be the AP or solution provider business that should do so, especially in cases where these entities are two different businesses. This would put the onus on the entity that holds the installer license, e.g. the solution provider, that is the entity that can clearly be held to account directly if they prove to be the entity that provides false information or has engaged the installer directly (as an employee or contractor) that has done so. PBA AP businesses noted that the AP always has been required to sign. ESIA has long held the position the installer should sign to provide visibility to the regulator, and now also that the solution provider business needs to be more visible to the regulator.

Consultation questions – proposed accreditation related guidance and conditions

12. Do you support the proposed matter the commission may have regard to in assessing whether an applicant is competent and capable to deliver the C&I solar activity?

No

13. If you answered “No” to Question 1, please specify which matters you disagree with and explain why.

Clarity is sought on whether it is the installer person or the business providing the solution and engaging the installer, either as a contractor or employee, that requires a minimum of two years’ experience.

Clarity is sought on where an AP business will stand in the this scenario as the AP business that simply creates the VEECs will not have two years’ of experience doing installations.

14. Do you have suggestions for alternative matters the commission should consider in assessing whether an applicant is competent and capable to deliver the C&I solar activity? Please list them if you do.

The ESC should collaborate with other regulators (such as the Clean Energy Regulator) to quickly verify applicants that have compliance record issues. The ESC

should consider any penalties against entities issued by other regulators.

15. Do you support the inclusion of a C&I solar activity accreditation condition requiring an accredited person to undertake a quality assurance review of an activity prior to VEEC creation as a practical and effective measure to support compliance and program integrity?

Yes

16. If you answered “Yes” to Question 15, who do you believe should be responsible for conducting the quality assurance review (i.e. what skills or qualifications should the person hold)? What sort of checks should be included in the quality assurance review?

There are mixed views. Some members consider that the person responsible for conducting a quality assurance review should be appropriately trained by a qualified person but not necessarily qualified themselves. This values the acquired learning which occurs amongst sophisticated AP businesses. For example, they train their compliance team staff to audit jobs for which they are not personally licensed, but for which they have check lists that are reasonable to provide with certificate creation.

Checks as part of a quality assurance review are best sourced directly from Ap businesses, as this information can be commercial in confidence.

17. If you answered “No” to Question 15, please explain why.

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18. Do you have any suggestions for alternative accreditation conditions you believe should be introduced for businesses participating in this activity to further strengthen compliance, quality assurance, and program integrity? Please list them if you do.

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For more information regarding this submission, please email ESIA Executive Director, comns@esia.asn.au