

CER Taskforce Consultation: National Technical Regulatory Framework for CER

Submission to the draft Prototype –
National Technical Regulatory Framework
for Consumer Energy Resources

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Feedback on the draft National Technical Regulatory Framework for CER

Energy Consumers Australia (ECA) is the national voice for household and small business energy consumers. We advocate for a fair, affordable, and reliable energy system—one that meets everyone's needs and leaves no one behind on the journey to net zero.

Consumers are increasingly participating in the energy market and their adoption of Consumer Energy Resources (CER) will play a pivotal role in meeting our future energy needs. CER devices, including their installation and operation, are complex and consumers cannot be expected to ensure their safety, compliance or interoperability with the grid.

In this context, regulation is required to overcome the information asymmetry between industry (manufacturers, installers, retailers and others) and everyday consumers. A regulatory framework should protect consumers from unsafe, unfair or poor practices by the industry that support the adoption of these technologies. Furthermore, better technical regulation can reduce the cost of effectively integrating CER into the energy system, providing benefits for all consumers.

ECA supports the national focus of the technical regulatory framework for CER ('the framework'), including the mandatory accreditation of installers and devices. ECA recommends that the CER Taskforce uses this opportunity to:

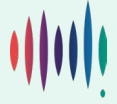
1. Enable access to independent dispute resolution by requiring installers to become members of ombudsman schemes.
2. Explore whether a consumer duty is suitable to the technical regulation of CER.
3. Regulate installers beyond the technical elements of their role to include all interactions with the consumer.
4. Share information with consumers through trusted, accessible sources.
5. Protect consumers from buying devices not on the Accredited Device List and expand its scope.

Each recommendation is discussed in turn below. If you have any questions about this submission, please contact Lotte Wolff at lotte.wolff@energyconsumersaustralia.com.au

Recommendation 1: Require installers to become members of state-based ombudsman schemes

ECA support nationally consistent access to dispute resolution for consumers who have an issue with their CER installation or product. Access to independent external dispute resolution builds trust with consumers and strengthens the market.

Currently, many complaints about CER products are outside the jurisdiction of the State and Territory energy ombudsman. In their November 2024 report, the Energy and Water Ombudsman Victoria (EWOV) reported an 11% increase in solar-related complaints compared to the previous financial year and revealed they were also receiving cases related to other forms of CER such as home batteries and electric vehicles. They note:



“These cases highlight the difficulties consumers face in engaging with these products, often due to complex tariff arrangements or unclear contract terms. All or part of the case may be outside of EWOV’s jurisdiction.”¹

It is ECA’s view that the existing energy and water ombudsman schemes should be expanded to cover CER. Some jurisdictions are already actively considering expanding their jurisdiction to cover CER.

For this to be effective, installers need to be required to become members. The CER Taskforce should add to the list of requirements that installers need to be part of their ombudsman scheme for complaint handling and dispute resolution.

Recommendation 2: Explore the suitability of a consumer duty for the technical regulation of CER

ECA supports a framework that is consumer-centric and focused on system outcomes.

Prescriptive rules may deliver the best outcome for consumers in the context of regulating the technical requirements of CER. Mandatory accreditation of devices and installers is an example of prescriptive rules and standards on CER that protect consumers from unsafe and non-compliant installation.

ECA has advocated for outcomes-based regulation to support outcomes for consumers now and into the future as the energy market evolves. The ACCC supports an overarching consumer duty for current and future energy services, such as CER.²

A consumer duty is needed to regulate industry interactions with consumers and should apply both to traditional retailers and new service providers, including installers. This could look like setting outcomes and providing detailed guidance to industry to ensure there is clarity and consistency as to what is expected from them.

We encourage the CER Taskforce to consider whether a consumer duty is relevant to technical regulation of CER. More information on consumer duty can be found in our submissions to the Better Energy Customer Experience (BECE) consultation and CER consumer protections review in Victoria.

Recommendation 3: Regulate installers across the consumer journey

Installers are often consumers’ primary interaction with the system and source of information about CER products. Ensuring they are a trusted by consumers, through accurate information and reliable installation, is critical avenue to improve consumer trust and build social licence for the transition.

Recent analysis by AEMO suggests compliances rates with technical standards are below the level required to ensure system security.³ Audits completed by Solar Victoria also found more than a third of installations were substandard.⁴

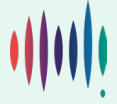
ECA supports nationally consistent, mandatory installer accreditation with an obligation for ongoing education. Specifically, ECA supports requiring installers to hold a licence from their jurisdictional safety

¹ EWOV, Reflect, November 2024, available: <https://www.ewov.com.au/reports/reflect-202411#issues-watch>

² ACCC, Inquiry into the National Electricity Market, July 2025, available at: [Inquiry into the National Electricity Market - July 2025 report](#)

³ AEMO, Compliance of Distributed Energy Resources with Technical Settings, 2025, available: [2025-08-19-as4777-compliance-status-update.pdf](#)

⁴ Victorian Auditor-General's Office, Delivering the Solar Homes Program, 2021, available: <https://www.audit.vic.gov.au/sites/default/files/2021-06/20210624-Solar-Homes-report.pdf>



regulator and complete CER specific training and examination. It is important that obligations for installers drive improvements in technical compliance of CER devices, as well as maintaining safety.

The CER Taskforce should consider broader obligations for installers in the design of the installer accreditation scheme. Eventually, installers should be regulated across non-technical elements of their role, including in recommending further CER products, calculation of payback periods and advice about electrification and disconnecting from the gas network.

Education and training should equip installers with the knowledge to provide consumers with accurate, honest advice to support consumers long-term interests. Monitoring of installers is essential so that non-compliant or dishonest installers can be identified and face consequences for non-compliance, including losing their accreditation.

Recommendation 4: Provide information through trusted sources

The regulatory framework proposes the regulator will provide information to consumers and industry. ECA supports providing industry will all the required technical information to fulfill their obligations.

Any information for consumers about CER should be provided through the most trusted and easy to access channels. Our research and experience shows this is:⁵

- At the point of sale, or where they make decisions about which device to purchase.
- From consumer advocacy organisations, such as CHOICE.
- Information provided by government, especially when integrated with sources consumers already access (e.g. Service NSW, Centrelink).

ECA recommends that any information provided to consumers should be aligned with existing information sources as much as possible, such as on Energy Made Easy, energy.gov.au or any future information hub.

Recommendation 5: Expand the scope of the Accredited Device List and prevent suppliers from selling non-accredited devices

There is an open question about how the Accredited Device List prevents non-accredited devices from being sold in Australia. The regulatory framework should operate so that suppliers cannot sell and install non-accredited devices. The Taskforce should clarify whether devices that are not accredited can be sold in the market; and what the mechanism is for monitoring and enforcement.

The onus should not be on consumers to check whether the device they are being sold is accredited. This would lead to a poor outcome for consumers, where consumers with lower energy literacy, a lack of time or knowledge to understand whether their device is accredited purchasing devices that are not approved or have poor interoperability with other devices.

The Taskforce should consider expanding the scope of the Accredited Devices List to include other consumer devices capable of demand flexibility, such as hot water heaters and space cooling/heating.

⁵ Insight Centre, for Energy Consumers Australia, 'Household Energy Consumers Information Research', November 2023, available at <https://energyconsumersaustralia.com.au/sites/default/files/wp-documents/Household-Energy-Consumer-Information-Research-Nov-2023.pdf>