

Guidance and Administrative Requirements for Commercial and Industrial Solar Photovoltaic System Activity

VIC

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Master Electricians Australia (MEA) is a peak industry association representing electrical contractors and is recognised by industry, government and the community as a leading business partner, knowledge source and advocate. You can visit our website at www.masterelectricians.com.au

MEA welcomes the opportunity to provide feedback on the Essential Services Commission's *Guidance and Administrative Requirements for Commercial and Industrial (C&I) Solar Photovoltaic System Activity* consultation.

MEA commends the Commission's intent to enhance integrity, safety, and consistency within the VEU program for C&I Solar PV installations. However, it is essential that these objectives are balanced with maintaining proportionality and minimising administrative duplication for accredited electrical contractors.

As MEA supports a nationally consistent approach to electrical licensing and accreditation, we favour an approach that aligns with the Solar Accreditation Australia (SAA) framework. MEA commends the Commission's efforts to ensure the proposed accreditation model reflects established and nationally recognised competency standards.

MEA's submission outlines practical opportunities to streamline administrative processes, improve interoperability between regulatory systems, and ensure the accreditation model remains proportionate to project risk while upholding safety, consumer confidence, and regulatory integrity.

Activity Requirements – VEET Regulations and VEU Specifications

Do you agree with the proposed training and competency requirements for solar system installers involved in this activity? Yes/No

Yes. MEA supports national harmonisation of electrical licensing and accreditation. In our recent response to the Federal *MP3 CER Roadmap* consultation, MEA reaffirmed its support for a national, mandatory accreditation scheme requiring licensed electrical workers to obtain SAA accreditation as a prerequisite for installing

Consumer Energy Resources (CER) irrespective of whether it is a condition of a government rebate program or not.

The requirements outlined in the consultation paper align with this position, without imposing any additional or unique accreditation or competency obligations on Victorian installers.

Record Keeping Requirements

Do you support the proposed record-keeping requirements for this activity? Yes/No

Installation Information

MEA urges the VEU administrative requirements to be interoperable with ESV's reporting requirements of electrical contractors to enable maximum data and information sharing through Certificate of Electrical Safety (CoES) systems via API integration. This approach would reduce duplication of information already captured under the CoES, minimising administrative burden and compliance costs for installers.

Geo-Tagged Images

MEA urges that system uploads be enabled in single, geo-tagged batches to streamline documentation. Consideration should also be given to offline functionality for installers operating in areas with limited connectivity.

Where possible, the VEU program should integrate with ESV's CoES system, enabling installers to complete all administrative uploads and documentation through a single submission.

Where CoES integration is not viable and/or practical, MEA encourages the development of a software portal for electrical workers that allows simple image uploads with automated location tagging and progressive saving, reducing the time required to capture and submit evidence during installation.

Product Traceability and Conformance

MEA supports the digitised product conformance and traceability framework developed by the National Building Products Coalition and recommends digitised conformance and traceability for CER.

Enhanced product traceability ensures that all CER actors (installers, aggregators, system operators, manufacturers) have access to complete and accurate product data, improving reliability in maintenance, orchestration and monitoring.

The framework also supports safer and more efficient maintenance over the product's lifecycle and improves accountability if faults or non-compliance are identified during future repair or replacement work.

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

As suggested above, MEA recommends:

- *CoES API Integration* – Between VEU and ESV systems i.e. CoES requirements) to streamline data and attachment capabilities, reducing duplication and compliance burden.
- *Software Ap* - Development of a pre-automated software portal enabling installers to capture and progressively save geo-tagged images through a mobile app, including offline functionality for areas with limited connectivity.
- *Product Traceability and Conformance* - Through adoption of the digitised conformance and traceability framework developed by the National Building Products Coalition (NBPC), supporting end-to-end visibility for CER products.

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/No

Given the intent of the photos and data captured, and MEA's proposed solutions to minimise the administrative requirements on electrical contractors, we believe the record-keeping requirements should remain largely consistent across all system sizes.

Do you support the proposed VEEC assignment form information requirements for this activity (see appendix A)? Yes/No

MEA believes the process can be significantly streamlined through the implementation of our previously suggested API integration or software ap, and product traceability measures. While the current form is satisfactory as an interim solution, it creates administrative burden by duplicating information already required from installers under CoES requirements.

We encourage interoperability between ESV and VEU systems by digitising the process so that the form is either pre-populated from the CoES form (and/or vice versa).

Customise

The requirement to customise the VEEC form with company logos and cost details should include functionality to save and auto-populate this information for future submissions, reducing duplication.

Administrative Requests

To improve usability, data fields completed by electrical contractors should also be saved and pre-filled where possible for subsequent form submissions.

Proposed Accreditation Related Guidance and Conditions of Accreditation for C&I Solar Activity

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?

Yes/No

MEA supports the Commission's expectation that applicants either employ, or have contractual arrangements with, individuals who hold SAA accreditation for Grid-Connected PV (GCPV) Design and Installation.

This requirement ensures installations are carried out by suitably qualified personnel while maintaining flexibility for smaller electrical contractors who may rely on contractual partnerships rather than direct employment. It also aligns with MEA's broader position supporting national consistency in licensing and accreditation through SAA.

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
MEA agrees with the intent to uphold quality and compliance but is concerned that requiring a QA review before VEEC creation would lead to delayed payments for the electrician installing the system. An alternative approach could be for the Commission to arrange remote verification of a system's performance within the first 90 days of installation, and if there are any performance issues to require rectification by the installer, or the installer would face losing their accreditation.

Additional Suggestions

Complaints Process

Where a complaints procedure is required under the 'Code of Conduct' requirements within scheme's application process, it should align with existing complaints handling procedures

Conclusion

MEA appreciates the opportunity to provide input into the Essential Services Commission's consultation on the *Guidance and Administrative Requirements for Commercial and Industrial (C&I) Solar Photovoltaic System Activity*. We commend the Commission's commitment to strengthening the integrity, safety, and consistency of the VEU program and acknowledge the importance of aligning accreditation requirements with established national competency frameworks.

MEA supports a nationally consistent, risk-proportionate approach that recognises existing regulatory and licensing frameworks administered by Energy Safe Victoria (ESV) and aligns with the Solar Accreditation Australia (SAA) model. Such an approach promotes confidence in industry while avoiding unnecessary administrative duplication or state-based divergence re accreditation requirements.

To reduce administrative burden and duplication on installers, MEA encourages further digitalisation of reporting requirements, including data integration between ESV and VEU, particularly through API connections to the Certificate of Electrical Safety (CoES) system and the adoption of digital product traceability frameworks. These measures would streamline compliance, automate data collection, and strengthen verification without adding red tape.

By taking a collaborative, technology-enabled approach, the Commission can deliver a framework that upholds safety and program integrity while supporting an efficient, future-ready, and nationally aligned clean energy workforce.

MEA looks forward to the development of this review and is available for further discussion.