



**Essential Services Commission of South Australia**

Submitted online

Att: Mr Adam Wilson, Chief Executive Officer

RE: [Scentre Shopping Centre Management application for exemption from holding licence](#)<sup>1</sup>

Dear Adam,

This submission is provided in response to ESCOSA's consultation on Scentre Shopping Centre Management (SSCM)'s application for an individual exemption from the requirement to hold a generation licence for their 540kW solar array at the Westfield Marion Shopping Centre.

We don't have any direct experience with SSCM, but The Energy Project has provided advice and assistance to multiple South Australian clients (solar and battery projects <5MW at existing customer sites) in order for them to:

- Apply for a generation licence,
- Comply with requirements of licences, particularly in relation to annual compliance reporting,
- Develop documentation and procedures for complying with generation licence conditions,
- Surrender licences based on operational/commercial changes to gain exemption under Regulation 15 of the SA Electricity Regulations.

Our experience is consistent with SSCM in that the compliance effort required for entities who operate generators >100kVA but less than 5MW is often disproportionate to the benefits received through operation of the generator - particularly when the generator is used primarily to offset on-site electrical load.

Further, our view is that the technical criteria for connection at this scale are best dealt with through the SA Power Networks connection process rather than generator licensing.

We support SSCM's pursuit of an exemption and encourage the Commission to consider a **review of the generation license threshold of 100kVA** in the context of the other obligations placed on distributed generators by AEMO, SA Power Networks, OTR, SA Government's smarter homes initiatives, AS4777:2020 and so on.

Sincerely,

Dr Andrew Nance  
Director

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<sup>1</sup> <https://www.escosa.sa.gov.au/projects-and-publications/projects/electricity/electricity-generation-licence-application-scentre-shopping-centre-management/electricity-generation-licence-application-scentre-shopping-centre-management>