



## Response to questions

7 May 2025

Responses to questions asked during the Battery information session are provided below. We have also included responses to questions asked by attendees when registering for the session. Questions have been grouped by themes. Some similar questions have been listed together, and a combined response provided. All questions have been included here, though some were answered during the session. You can watch the recording of the session on our website [here](#).

### Distributed Energy Resources (DER) Register - processes

**35% of audit recommendations related DER. 5 months into the scheme, we still don't have a functional process. Any updates on this?**

DCCEEW and AEMO continue working with DNSPs to improve processes and address delays. There has been a significant improvement since the activity commenced in November 2024 for Ausgrid and Essential. Endeavour's system is now live. View the [video of AEMO's presentation](#) for an update and to hear what AEMO is doing to support the DER registration process. See these AEMO links for more information, including FAQs:

- [DER Register information](#)
- [DER Register portal – support documentation](#).

An update on the Endeavour DER registration is provided below. More information is available on the [Endeavour website](#).

**If a DNSP is not providing timely or workable systems or processes to complete a DER, how does IPART intend to deal with this apart from penalising ACPs.**

The transitional provisions for the DER Register allow ACPs to register certificates ahead of being able to evidence a BESS being on the Register. There are 2 parts to the transitional requirement:

- Clause 11.7(a) applies in place of the Implementation Requirement 4 in the rule: "The ACP must have made a proper application to register the installation of the End-User Equipment on the DER Register"
- Clause 11.7 (b) - within 60 days of the Implementation Date, the ACP must ensure that the installation of the End-User Equipment is registered on the DER Register.

IPART will take into account individual circumstances when considering how to manage issues with the DER registration process. For example, where an ACP has made a proper application and taken all reasonable steps to ensure that an installation is registered, auditors would generally provide qualified assurance. IPART has taken the view that the appropriate remedy is for the ACP to report on progress with the DER Register application and evidence when it is complete. A simple way to do this is via Audit Recommendations. The audit recommendation remains outstanding until the BESS makes it onto the DER Register.

**The transitional arrangements for the DER Register requirement expire on 19 June 2025. Will IPART as Scheme Administrator extend them?**

IPART is monitoring progress of the DER registration process in conjunction with AEMO. No decision has been made by the Scheme Administrator. ACPs should work on the assumption that the transitional arrangement will expire on 19 June 2025 and help installers understand how to meet evidence requirements. IPART will provide notice if it intends to publish a different expiry date.

**What was done by IPART to understand how and if the DER Register was working before activity launch? Could these issues have been identified prior to the launch?**

IPART does not draft the Rule. However, it liaised with key stakeholders and continues to work with DCCEEW, AEMO and the NSPs to identify issues and their resolution. Feedback on PDRS Rule requirements and other policy issues can be directed to DCCEEW at [sustainability@environment.nsw.gov.au](mailto:sustainability@environment.nsw.gov.au).

## DER Register – registration, evidence requirements and access

**What kind of document is a "DER Registration receipt"? What does it look like? Is it just the email confirmation from the DNSP?**

The DER Register receipt is the receipt obtained when the battery has been successfully registered on the DER Register. See pages 22-23 of the [Guide to DER Register Installer Portal](#) for more information. It takes the form of a PDF. An example is provided on page 23 of the Guide.

**What specific evidence is required to prove sufficient steps have been taken to register?**

The [PDRS Method Guide](#) provides clear guidance on what constitutes a proper application.

Auditors receive guidance from IPART on application of the Rule. It is not their role to provide guidance to ACPs outside of their Audit Reports. We will consider an ACP's individual circumstances when assessing what, if any, compliance action may be appropriate if an ACP does not meet a requirement. See previous responses for more information.

**Can we submit an alternative receipt such as HTML response for the DER submission, or does it have to be the AEMO generated PDF?**

Page 22-23 of the [Guide to DER Register Installer Portal](#) shows how to download the PDF. ACPs should be working with their installers/representatives ahead of expiry of the transitional provisions, to ensure their representatives can provide evidence in a suitable format.

**What is the plan regarding the DER register receipt technical issues?**

**What to do if the ACP incorrectly input details in the DER Register (e.g., incorrect nominal capacity)? What's the next step if they make this mistake?**

Contact AEMO support for assistance – see [AEMO | DER Register portal](#) for contact details.

**What should installers do when existing solar installs had wrong details and application is locked?****If the job shows as "locked" on the AEMO portal and we cannot download the AEMO receipt, what does it mean?**

According to AEMO a locked record means one of two things:

- (1) The record is confirmed, and no changes can be made as it is. A request to the NSP to grant access would unlock the record.
- (2) The initial record is over 365 days old and has become an 'idle' record. The NSP can request to assign a new job number, and the record will be accessible.

**Can AEMO provide examples of the document that is required to be submitted? My understanding is that the evidence differs depending on DNSPs.**

Each DNSP has its own procedure for applications to connect. Installers should work with the systems of the relevant DNSP.

**Is it correct that installers / DNSP must report the battery usable kWh capacity regardless of the inverter kW / kVA value to the DER Register?**

This is correct – the kW and kWh rated values for the battery installation are both required.

**Can it be considered that ACPs could access the DER register as a way of confirming installers have submitted their registration?**

We have passed this question on to AEMO for consideration.

## DER Register – Endeavour systems

**What is IPART's stance on the Endeavour DERR process? Currently they need to apply for grid connect and complete a web form but can't add battery to DERR.**

Not all DNSPs, e.g. Endeavour, have a process linked to the system. What do we do then?

What about Endeavour Energy who do not create any AEMO registration for the battery?

How are you going to address the issue with Endeavour who are not sending DER details to AEMO therefore installers cannot get access to the receipt?

What about Installers that are actively being told by Endeavour Energy that they don't need to complete a battery registration?

How best to deal with backlog of Endeavour jobs?

Endeavour clearly published that a battery registration form is an alternative evidence for DER registration but it is deemed unacceptable by IPART.

Registering a battery installation on the DER Register is a requirement for **all** battery installations, including those outside the PDRS. Installers and ACPs should ensure they meet these requirements.

The transitional Rule arrangement allows for PRC creation ahead of proof that a BESS is on the DER Register provided a proper application has been made. The [PDRS Method Guide](#) explains how to evidence a proper application for the transitional arrangements in the Endeavour network (see also the [Guide to DER Register Installer Portal](#)). IPART's documents are the source of authority for scheme requirements.

The Endeavour system is now live for new applications. More information is available on the [Endeavour website](#). Endeavour is processing the existing applications in 2 separate tranches and expects to be able to progress those with AEMO soon. You can follow Endeavour's instructions on its website.

We understand that once this update is complete, Endeavour will be decommissioning the current forms on its website, and installers will be able to finalise closeouts and registrations via AEMO's portal.

IPART is tracking the progress of implementations in audit. We expect ACPs to establish that the BESS makes it onto the register. This arrangement ensures no certificate creation is held up where a proper application for DER registration has been made.

Auditors will make findings for where DER Register listing is outstanding and a corresponding recommendation that it be tracked and confirmed when registered on the DER Register.

IPART is liaising with AEMO and Endeavour to monitor the backlog.

## Installation

**Please clarify the requirement for weep brick hole within the barrier zone of the habitable room. Do we have to seal them fire retardant sealant?**

**Does the 600mm rule apply for a door that is only 1m high & leads to under floor [1m high] room that will be used for Storage Inverter, and Storage Battery is in this room also?**

**In case of the picture shared by Paul - the one with the lamp - is the implementation deemed to be invalid?**

**[Please clarify] location of batteries - Not to face North into the hot sun? Not to be within 70cm of power boxes? Not to be in sun when installed externally? External battery covers?**

**When is a smoke alarm required for a battery installation for carports, verandah and underneath buildings?**

**Does an inverter supply switch label constitute compliant labelling of the switchboard?**

**Is a garage door, being an exit which requires the 600mm clearance, something that is stipulated in NSW state legislature or is it also mentioned in AS/NZS5139?**

We received several questions seeking clarification about specific installation requirements. We're not able to answer questions about specific situations or cannot advise on how to fit particular scenarios to PDRS or AS/NZS 5139 requirements.

Requirements for battery installations are set out in AS/NZ5139 and other relevant standards flagged in the Building Commission presentation. ACPs should work with their representatives to ensure they can clearly demonstrate compliance.

That may include identifying a different installation location or designing the installation to better meet the standard. If in doubt, seek professional advice or act conservatively. If an implementation does not comply with AS/NZS 5139, it is in breach of the PDRS Rule. In case of the 'lamp in the exclusion zone' example, this is a breach of AS/NZS 5139. Rectification of that scenario may be as simple as relocating the light.

It is good practice to protect a battery from extreme conditions. See AS/NZS5139 and other guidance documents on good installations and how to protect batteries from extreme environmental conditions and physical damage. The NSW Climate and Energy Action [Guide to owning a battery](#) webpage has more information, including links to installation guides.

**Who can we ask about site-specific conditions that are sometimes unclear in the installation guidelines? For example, the clearance from gas pipes or meters.**

Installers should work with their ACP who may in turn also access consulting or legal advice.

## PRC creation

**The current BESS1 calculation method returns a different number of PRCs to the TESSA upload file (due to rounding). Will this be addressed in a rule update?**

It is a matter for DCCEEW to consider if clarification in the PDRS Rule is warranted. IPART intends clarifying rounding in its guidance.

**What is the highest volumetric limit that has been given to an ACP?**

We are unable to disclose this information.

**Why are the volumetrics so low?**

**As an ACP we have complied with all of IPART's requirements through audit, site inspection findings and requests for information, yet awarded a very low volumetric.**

We take a risk-based approach when managing certificate creation limits. Batteries are a new activity and have different risks to other ESS and PDRS activities. It is appropriate that we take these factors into account when setting certificate creation limits. We all want the scheme to be successful AND sustainable. We understand that certificate creation limits can have an impact on how you manage your business, but we will continue to take a measured approach while we build our understanding of the risks.

You always have the option of pre-registration audits, and we encourage you to use these to manage certificate creation. The results of all audits are included in your compliance record and considered when you apply to amend your conditions of accreditation.

IPART will consider applications to increase a volumetric limit on a case-by-case basis and using a risk-based approach. We make decisions based on the information provided in the application and our published guidance. The guide allows for flexibility where appropriate and it is open to ACPs to apply to vary their conditions. It is up to ACPs to make a case to demonstrate that a variation to conditions is appropriate.

ACPs should proactively manage their certificate limits, including through planning for pre-registration audits. You should ensure you have all evidence to help streamline the audit process. There is no one-size-fits-all approach to how an ACP should manage certificate creation, and we have seen ACPs use a range of business models. One approach is the use of a combination of pre-registration and post-registration audits.

We anticipate that as ACPs, installers and regulators get more comfortable with the activity, certificate creation limits will continue to grow.

**Should my ACP be charging GST on their invoices? STC invoices have never attracted GST unless commercial. I am unsure why PRCs are any different?**

We cannot provide advice on the application of GST. Please contact the Australian Taxation Office.

**Is there a limit in the number of PRCs ACPs can create monthly?**

**When will you give ACP's power to approve unlimited PRC credits? We are currently unable to trade jobs that are approved due to limits imposed on our ACP.**

There are no monthly limits but ACPs can only create PRCs up to their unaudited certificate creation limit. ACP audit conditions are set out in the ACP's accreditation notice. An ACP can apply to change their audit conditions and certificate creation limit. Section 4.1 of the [Amending audit certificate creation limit conditions guide - ACPs](#) provides details.

ACPs can also undertake pre-registration audits before registering PRCs if they wish to register more certificates. There is no limit to the number of PRCs that can be audited in a pre-registration audit.

**When can I trade PRCs? My ACP has put payments on hold due to IPART restrictions? Their next audit is sometime this month but we are small business without 28k.**

ACPs can create PRCs only up to their unaudited certificate creation limit. An ACP's audit conditions are approved by IPART in an ACP's accreditation notice. An ACP can apply to change their audit conditions and certificate creation limit. Payments are a commercial matter between installers and ACPs. Your ACP has a range of options available to them to manage their certificate creation limits including using pre-registration audits and applying for an increase in their certificate creation limit.

## Audits and inspections

**How do Building Commission NSW and IPART update ACPs on inspection results, regardless of the outcome? Similar to Solar Victoria and CER independent reports?**

Currently IPART only contacts ACPs if an issue is identified during an inspection. We could consider informing ACPs of all inspections, regardless of the outcome.

**When undergoing an IPART audit, what is the process for selecting jobs to be audited? Is it a sample size?**

The [IPART Audit Guide](#) sets out the sample method to be followed in the audit. It uses a statistical approach to identify the number of implementations to be tested in each of 3 testing tiers. The sample sites are selected at random unless IPART identifies particular sites for testing.

All sample sites undergo Tier 1 testing which is a desktop review of evidence. A subset of the Tier 1 sites undergoes more detailed testing (Tier 2 testing) while a subset of these sites undergoes a site visit (Tier 3 testing).

**In the event of serious complaints regarding specific installers, will IPART/Building Commission name these parties so other participants are aware?**

IPART will not name specific installers as it does not regulate installers. The Building Commission has named licenced trades people who have been fined for specific breaches.

**How does IPART and the Building Commission work together?**

IPART looks at compliance with PDRS Rule requirements, while the Building Commission looks at compliance from a different perspective as they regulate the installers. We're working together and we all want the scheme to be successful.

## Consumer information

**Is this information session of any use for a private house holder who has solar panels and wishes to install battery? If not, where can we get information.**

NSW Government's Energy website has information on [things to consider before installing a battery](#), including links to sites where you can find more information. They also have a [checklist for consumers](#).

IPART has published a [battery factsheet for consumers](#).

**If customers don't recall the name of an ACP despite best efforts, this likely represents the customers perception, attention or recall capabilities.**

The ACP must have a documented customer engagement procedure to show how you will meet the [PDRS Method Guide](#) Customer Engagement Requirements contained in Table 3.2. This includes explaining the contents and function of the Nomination Form (which includes the ACP's details) and providing a copy to the customer. When IPART conducts inspections, we ask customers if they received any paperwork or emails to prompt them.

**The customer demographics for 80% of sales is 50–60-year-olds. Customers receive ACP's details in email. Most are not tech savvy. What else can/should we do?**

It is the responsibility of installers to make the ACP's name and details clear to the customer. They have to inform their customers that they are acting on the ACP's behalf. It is the responsibility of the ACP to ensure that installers are appropriately trained to provide this information to the customer.

## Products

**During the audit, did we find any products that did not qualify for the scheme requirements? If yes, which ones?**

No, IPART has not found any products during audits that did not meet scheme requirements.



**What about batteries that don't comply with the equipment requirements in the PDRS rule? Such as the cumulative throughput not meeting 2.8MWh/kw.**

Products that don't meet PDRS requirements are not eligible under the scheme.

**There are many solar battery recall notices advertised on TV. Any further info?**

The ACCC is Australia's consumer product safety regulator. See the [ACCC website](#) for more details about product recalls.

## Installation data

**How many batteries are being installed in NSW each week?**

While the number installed weekly has varied over time, monthly reporting data indicates there were 9738 BESS1 implementations to the end of March 2025. That equates to over 450 batteries installed per week under the PDRS on average since the activity commenced on 1 November 2024. We don't have data for batteries installed in NSW outside the PDRS.

**Is there any report on who installs how many each month, like Solar Victoria industry reporting?**

While we require ACPs to report monthly on implementations in the previous month we do not make the data publicly available for privacy and commercial reasons. PDRS [Implementation Data available in TESSA](#) does provide data on PRC registrations for battery activities by ACPs.

## Evidence requirements

**Is IPART working to refine the BESS2 evidence process to make it easier for customers to register their claim?**

Under the PDRS only ACPs can register certificates from BESS2 implementations. Customers cannot claim certificates. Installers should work with the customer and the ACP to ensure they meet PDRS evidence requirements for BESS2.

**What is the process to request an update to the method guide to improve clarification around evidence requirements?**

We welcome feedback. Please contact us via the methods listed on our [Contact us page](#), providing detailed reasoning for your request.

## Home building insurance

**Is IPART working with the relevant Government bodies to ensure that Home Building Compensation cover is taken out where appropriate?**

IPART makes referrals to the Building Commission and other regulators where we receive reports of or detect non-compliance. See [Home Building Compensation Fund \(HCBF\)](#) for information on when HCBF insurance is required. Use the [HBC Assist tool](#) to check if a job needs HBC cover.



## Licensing

**We have found that a number of retailers and installation companies did not have a company's contractor license. Was this a systemic issue in the industry?**

**Does the business that sold the battery need to hold the contractor license or does the installer?**

IPART has issued [Heat Pump Water Heater – Scheme Legislative Licence Requirements guidance](#) which specifies when a contractor licence is required. Generally, if a business is advertising for work, they would need a contractor licence but for a more precise answer, contact the Building Commission.

## Implementation data reporting

**Why does IPART ask for data for jobs that hasn't been submitted yet? IPART audited jobs that weren't compliant and would have been rejected by ACP.**

Monthly implementation data submitted is not audited by IPART. We use the data you provide to identify trends in terms of location, system sizes, preferred products and the installers you are working with. The intent of this data interrogation is to give us information to identify emerging risks and assist customers.

## TESSA

**TESSA import CSV says "Was a new inverter installed?", but does IPART need existing inverter details on battery-only installs where battery is not "smart"?**

**In the implementation data reporting for inverter warranties, do hybrid inverters need to be reported on? For example, Teslas have built in inverters.**

ACPs only need to provide inverter brand and model information when a new inverter is installed as part of the implementation. Brand and model information is not required for existing inverters or integrated inverters.

## ACP application approval

**What is the timeframe for approving Accreditation applications for PDRS Battery?**

Assessing an application from a new applicant typically takes around 4 months from when the application fee is paid. The time it takes to become accredited depends on the quality of your application, your business systems and processes, and whether you are already an ACP. See the [PDRS application process page](#) for more information.

## ACP responsibilities

**What are my responsibilities as an ACP?**

You can find out more about the scheme by watching a recording of our [Understanding the PDRS information session](#).

When you are accredited as an ACP for battery activities, you are issued an Accreditation Notice setting out the conditions imposed on the accreditation. This will detail your various responsibilities.

The [PDRS Method Guide](#) sets out your obligations as an ACP. Please also see the [Compliance Guide](#) which details how IPART monitors activities to prevent non-compliance.

## Incentive stacking

**There is a clause in the PDRS rule that doesn't allow a claim for STCs and PRCs. With the possible Federal battery scheme coming up, would this be reviewed?**

As is currently drafted, in the PDRS Rule, activities eligible to create tradeable certificates under the *Renewable Energy (Electricity) Act 2000* (Cth) are not eligible under the PDRS (cl. 5.4(e)). Changes to the PDRS Rule are a matter for DCCEEW. You can contact DCCEEW at [sustainability@environment.nsw.gov.au](mailto:sustainability@environment.nsw.gov.au).

## Retailer's role

**What's the role of the retailer? If any non-compliance is found, are installers solely responsible?**

Battery retailers do not have a role in the scheme. ACPs and their installers are responsible for ensuring PDRS and other requirements are met. Retailers have no role in instances of non-compliance, unless they are also the installer.

## Warranty

**Can IPART provide some clarification around the warranty requirement for batteries under BESS1? Many manufacturers have a clause around warranty start date.**

Battery energy storage systems installed under Activity Definition BESS1 must meet warranty requirements specified in the Equipment Requirements for Activity Definition BESS1 (See Schedule C in the [PDRS Rule](#)). Existing inverters installed before the Implementation Date must also meet warranty requirements specified in Activity Definition BESS1. ACPs must work with their installers to ensure batteries installed under the PDRS meet all PDRS requirements, including warranty requirements.

## Questions received during registration for the session

**Why aren't solar batteries affordable?**

The PDRS BESS1 and BESS2 activities aim to reduce the cost of installing batteries. Early indications are that the Scheme is supporting household uptake of batteries.

**What does an auditor need to be aware of in battery installations and to review in detail?**

Requirements are set out in our [PDRS Method Guide](#) and audit scopes. The method specific scope items cover eligibility requirements, equipment requirements including warranty requirements, installation requirements including ANZS/5139.

We are working with auditors to focus the assessment of the standard to items specifically listed in the [PDRS Method Guide](#) (p67) relating to installation safety:

- Battery not in restricted zone or near windows/doors, etc.
- Habitable room requirements
- Site map
- Risk assessment
- Switchboard labelling and signage.

**Does IPART have any checklist for battery installation as a single document that solar installers can use?**

IPART provides guidance in its [PDRS Method Guide](#) on PDRS requirements for batteries. It includes a compliance checklist for ACPs but is focused on rule compliance and is not designed for installation compliance.

There are publicly available guidance documents such as the [Solar Victoria Battery Audit check list and guide](#). DCCEEW has published a [Battery Installation Checklist](#) from a consumer point of view.

Installers should work with their ACP on specific requirements, and it is open to them to come up with their own process and systems to manage compliance with standards. IPART does not intend to develop a 'single document' checklist for installers. We may publish further specific guidance, such as the FAQs we did for heat pumps, as we get learnings on the key issues we are seeing with installation.

**Does the Regulator, IPART, have data on how many BESS 1 Battery activities have also been sold with a BESS2 VPP activity? What is the uptake for VPP sign-ups since the two activities were introduced 1 November 2024?**

We don't have any specific data at hand, but generally the uptake of BESS2 has been slower and there is a smaller number of approved ACPs and an even smaller number that are active.

**Are there incentives for C&I batteries being introduced to PDRS. If so, when?**

This is a policy issue for DCCEEW to consider. IPART will work with DCCEEW on operational and implementation considerations if C&I battery activities are included in the scheme.

**Are there stickers available to cover up the branding on Tesla batteries?**

It is not a good idea to change the appearance of a battery as it might interfere with the ability to identify the product in an emergency. We are not aware of any attempts to deliberately damage or vandalise battery products under the scheme to date.