



Australian Government



Australian  
**Small Business and  
Family Enterprise**  
Ombudsman

5 November 2020

Clean Energy Regulator  
Rooftop Solar Sector Review  
GPO Box 621  
Canberra ACT 2601

*via email: solarpvreview@cleanenergyregulator.gov.au*

Dear Sir/Madam

### **Rooftop Solar Sector Review**

We note that the majority of solar installers and retailers act with integrity, and the importance of solar rooftop panels in limiting electricity cost increases for small and family businesses. In this light, we make the following comments:

#### **1. Solar Installers Accreditation Expansion**

Although we have not received sufficient complaints from small businesses about faulty solar installations to argue for mandatory accreditation, small solar installers would like to see greater competition in the solar industry accreditation market. Currently the Clean Energy Council holds a monopoly for solar accreditation. Introducing competition would reduce accreditation costs and permit some small installers to become accredited.

#### **2. Approved Retailer Program**

Currently the only Approved Retailer program (ARP) is run by the Clean Energy Council. Should an additional accreditor be introduced, we recommend a second ARP be established, with a supporting code of conduct. This will lower approval costs and make it financially viable for small retailers to become approved.

##### **a. Franchises**

The current program does not specify whether franchisors or franchisees are required to be approved. Clarification that the franchisor requires approval is needed. This would prevent franchisors from pressuring franchisees to become approved retailers, especially where the franchisee has little control over their ability to meet prerequisite and ongoing requirements.

##### **b. Linked Finance Contracts**

We are aware of issues with third party finance providers (linked contracts) in other sectors with similar models. Currently, all approved retailers must meet the requirements of the Solar Retailer Code of Conduct, and should abide by the Code. The Code requires clear disclosure of all information in relation to finance or alternative purchasing arrangements. An additional ARP could boost the number of approved retailers, increasing transparency and accountability regarding disclosure of linked contracts.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Ms Genevieve Chan on 02 6213 7425 or at [Genevieve.Chan@asbfeo.gov.au](mailto:Genevieve.Chan@asbfeo.gov.au).

Yours sincerely

**Kate Carnell AO**

Australian Small Business and Family Enterprise Ombudsman

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