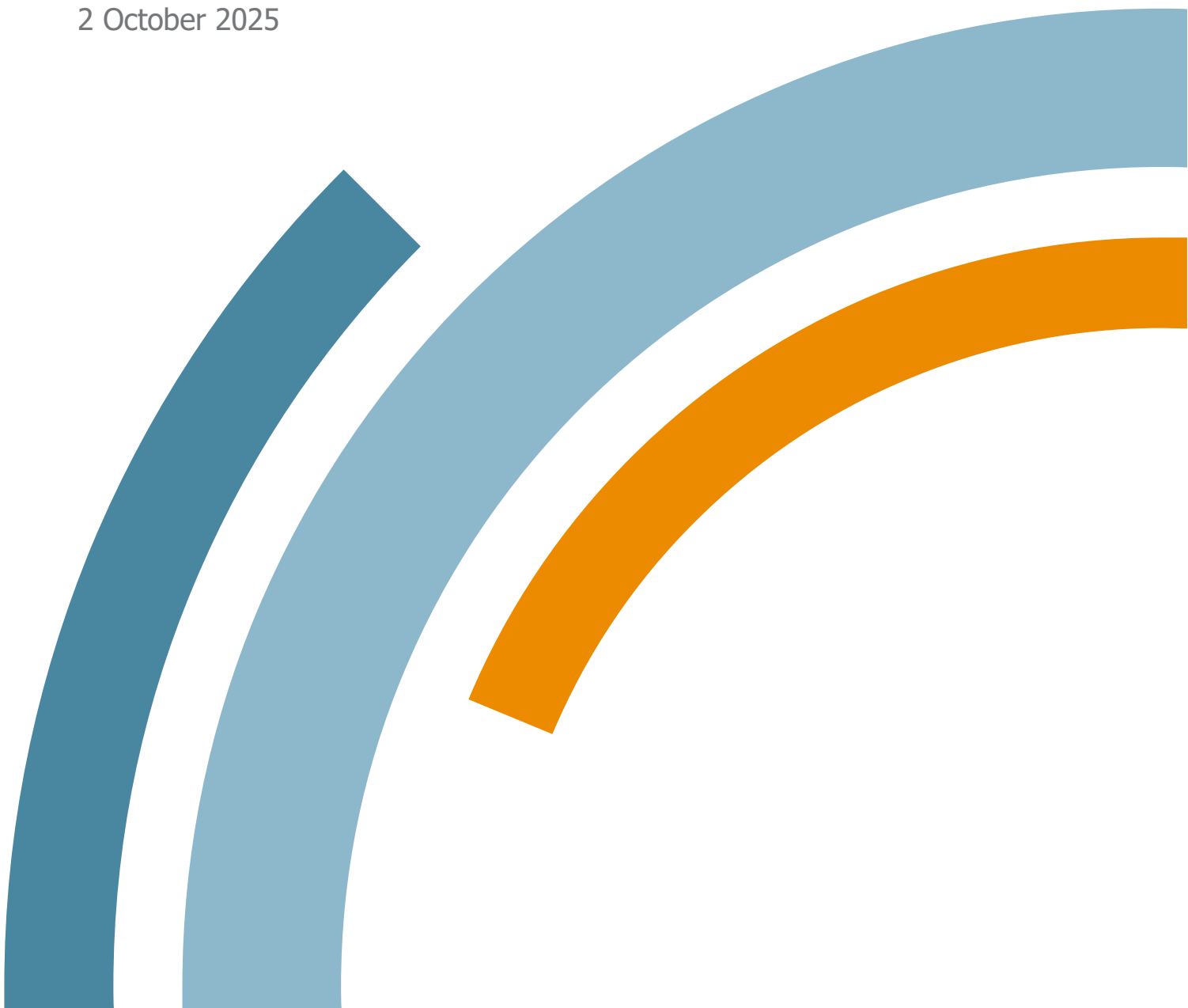


Consultation paper – Guidance and administrative requirements for commercial and industrial solar photovoltaic system activity

2 October 2025



Acknowledgement

We acknowledge the Traditional Owners of the lands and waterways on which we work and live.

We acknowledge all Aboriginal and Torres Strait Islander communities, and pay our respects to Elders past and present.

As the First Peoples of this land, belonging to the world's oldest living cultures, we recognise and value their knowledge, and ongoing role in shaping and enriching the story of Victoria.

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Overview



We invite your feedback on the proposed guidance and administrative requirements for the new commercial and industrial solar photovoltaic (PV) system activity (C&I solar activity) under the Victorian Energy Upgrades (VEU) program.

Your feedback will help us set our guidance and administrative requirements.

Purpose of this consultation paper

The Essential Services Commission (the commission) invites feedback from accredited persons, industry stakeholders, solar system designers and installers, and other relevant parties on:

- our proposed administrative requirements (training and competency and record-keeping requirements) for the C&I solar activity
- our proposed guidance on competent and capable matters for those applying to be accredited to undertake the C&I solar activity
- potential accreditation conditions for accredited persons undertaking the C&I solar activity.

The new C&I solar activity commenced on 29 September 2025.

We recognise the importance of consulting with industry in developing our administrative settings, particularly given the complex, technical nature of this activity. We will use stakeholder feedback to develop guidance and administrative requirements for this activity that strike the right balance between maintaining program integrity/protecting consumers and minimising the red tape burden on participating businesses, in addition to aligning with established industry practices and standards where possible.

Our guidance and administrative framework for this activity will be outlined in relevant program guides and in the Victorian Energy Efficiency Target Guidelines (VEET Guidelines), to be published by late October on the [commission website](#). These will include:

- guidance on matters the commission may have regard to when considering whether the person is competent and capable for the purposes of accreditation in respect of this activity
- training and competency requirements for scheme participants (SPs) undertaking this activity
- record-keeping requirements for APs undertaking this activity.

Have your say

To submit your feedback on the proposed administrative and record-keeping requirements for the commercial and industrial solar PV system activity, please complete the [consultation submission form](#). You can also email your submission to veu@esc.vic.gov.au, using the subject line: 'Consultation submission – VEU commercial and industrial solar PV system activity'.

This consultation will close on **Thursday, 16 October 2025**. All submissions must be received by this date.

If you would like your submission to remain confidential, please indicate this in the consultation submission form or clearly state this in writing if submitting your consultation response via email. This information will be provided in de-identified, aggregated form on our website and shared with the Department of Energy, Environment and Climate Change (the department). No personal information will be shared beyond the team analysing the consultation submissions. You can review the commission's submissions policy [here](#).

About the Victorian Energy Upgrades program

The VEU program helps reduce Victoria's greenhouse gas emissions by providing access to discounted energy-saving products and activities via accredited providers. When accredited persons undertake an eligible energy upgrade, they create Victorian energy efficiency certificates (VEECs) under the program. Each certificate represents one tonne of carbon dioxide equivalent of greenhouse gas saved. For more information on the VEU program please visit www.esc.vic.gov.au/veu.

The *Victorian Energy Efficiency Target Act 2007* (VEET Act) establishes the Victorian Energy Upgrades program and confers functions and powers on the commission to regulate and administer the VEU program. VEU program activities are prescribed and specified in the *Victorian Energy Efficiency Target Regulations 2018* (VEET Regulations), *Victorian Energy Efficiency Target (Project-Based Activities) Regulations 2017* and associated specifications.

Our role

The commission is responsible for regulating participants in the VEU program and administering the program in accordance with the program's Act, regulations and specifications which are developed by the department. The commission is also responsible for preparing and issuing the VEET guidelines for matters required or permitted by the VEET Act.

We publish program guides to assist participants in the program to comply with the program rules. The commission is also responsible for setting administrative requirements for the program, including:

- specifying the records that an accredited person must collect and keep in the VEET Guidelines
- specifying the training and competency requirements to be undertaking by SPs undertaking a prescribed activity or any part of a prescribed activity in the VEET Guidelines
- specifying the manner and form, and information to be recorded on VEEC creation forms and on VEEC assignment forms in the VEET Guidelines.

1. Consultation context: New commercial and industrial solar photovoltaic system activity

The department released the *Victorian Energy Efficiency Target Amendment (Commercial and Industrial Solar, High Efficiency Motors and Other Matters) Regulations 2025* on 23 September 2025 which introduces a new commercial and industrial solar photovoltaic (PV) system activity (C&I solar activity) into the VEU program from 29 September 2025.

The department released the Victorian Energy Upgrades Specifications 2018 (the VEU Specifications) on 29 September to support the introduction of the activity into the VEU program from this date. The VEU Specifications include more detailed information on the:

- product requirements for the activity, including warranty requirements
- pre-installation requirements for the activity
- installation requirements for the activity
- greenhouse gas emissions reduction calculations for the activity (i.e. calculation to determine the number of Victorian energy efficiency certificates (VEECs) to be awarded for the activity.

The commission is consulting on proposed guidance and administrative requirements for this activity, in order to release our guidance and requirements as soon as possible.

This paper outlines the proposed guidance and administrative requirements for the C&I solar activity under the VEU program based on the requirements set out in the VEET Regulations and VEU Specifications.

1.1. Activity requirements – as per the VEET Regulations and VEU Specifications

Part 47 of the VEET Regulations introduces the C&I solar activity as a new activity into the VEU program. Part 47 of the VEET Regulations provide that the prescribed activity is installing, in accordance with a negotiated contract and in accordance with the specified pre-installation requirements (if any) and the specified installation requirements (if any), a product that complies with the criteria specified in table 47.1 of the VEET Regulations which is comprised of:

- one or more approved inverters (other than excluded inverters)
- one or more approved photovoltaic modules (other than excluded photovoltaic modules).

Table 1 below sets both the product criteria for solar systems to be installed under this activity (in the VEET Regulations), as well as the requirements for eligible scenarios for the activity (in the VEU Specifications). Table 2 below sets out additional activity requirements that must be met (in the VEU Specifications).

Note: We are not consulting on the activity requirements which are listed in the VEET Regulations and activity requirements in the VEU Specifications.

Table 1: Product categories and scenario numbers under the C&I solar activity (activity 47)

| Product category/ Scenario number | Requirement of system to be installed |
|--------------------------------------|--|
| 47A | <p>A solar photovoltaic system that:</p> <ul style="list-style-type: none"> • is connected to a distribution network by one or more photovoltaic modules to produce and deliver energy; and • has a solar photovoltaic module capacity of more than or equal to 30 kW and less than or equal to 100 kW; and • is installed in compliance with the relevant Distribution Network Service Provider's negotiated connection contract; and • can be either a new connection or a connection alteration • uses solar photovoltaic modules (solar panels) listed on the Clean Energy Council approved modules list; and • uses inverters listed on the Clean Energy Council approved inverters listed. |
| 47B | <p>A solar photovoltaic system that:</p> <ul style="list-style-type: none"> • is connected to a distribution network by one or more photovoltaic modules to produce and deliver energy; and • has a solar photovoltaic module capacity of more than or equal to 100 kW and less than or equal to 200 kW • is installed in compliance with the relevant Distribution Network Service Provider's negotiated connection contract; and • can be either a new connection or a connection alteration • uses solar photovoltaic modules (solar panels) listed on the Clean Energy Council approved modules list; and • uses inverters listed on the Clean Energy Council approved inverters listed. |

Table 2: Additional requirements for commercial and industrial solar PV systems to be installed

| Product category/ | Requirement type | Details |
|-------------------|------------------|---------|
|-------------------|------------------|---------|

| Scenario number | | |
|-----------------|---|--|
| 47A | Pre-installation requirements – Solar Panel Validation Initiative | All solar photovoltaic module manufacturers must be listed by the Clean Energy Regulator as a participating brand in the industry-led Solar Panel Validation Initiative . |
| 47A and 47B | Installation requirements – monitoring system | Solar photovoltaic systems installed must support a monitoring portal capable of tracking system performance, system energy production and system energy consumption, and which is able to be accessed by the end user. |
| 47A and 47B | Installation requirements – system sizing | The accredited person or scheme participant carrying out the activity must size the system in accordance with Solar Accreditation Australia requirements for the design and installation of grid-connection solar photovoltaic systems. |
| 47A and 47B | Product warranty requirements | <p>All inverters installed must be covered by a warranty against defects for a period of at least 5 years from the date of installation, purchase or supply (as applicable).</p> <p>All solar photovoltaic modules installed must be covered by a warranty against defects for a period of at least 10 years from the date of installation, purchase or supply (as applicable).</p> <p>In addition to the requirements of a warranty against defects under the Australian Consumer Law (Victoria), the warranty must also include the contact details of who to contact regarding the product warranty obligations in Australia in the event of a product failure, if the person who gives the warranty is not in Australia.</p> |
| 47A and 47B | Inverter Requirements | The total connected inverter capacity as installed and per the relevant Distribution Network Service Provider's negotiated connection contract must be a minimum of 30 kVA. |

2. Items for consultation: guidance and administrative requirements

The following section outlines our proposed guidance and administrative requirements for the C&I solar activity.

2.1. Training and competency requirements for scheme participants

Under the VEU program, scheme participants must not undertake a prescribed activity, or part of a prescribed activity, or regulated action unless they:

- have completed with the training and competency requirements specified by the commission in the VEET Guidelines
- provided evidence of compliance to the relevant accredited person
- scheme participants include an employee of an accredited person, a contractor of an accredited person or an employee of a contractor of an accredited person.

We propose to set the following training and competency requirements for the C&I solar activity in accordance with section 14FA of the VEET Act for persons:

- installing the solar PV system (solar system installers)
- designing and sizing the solar PV systems for installation (solar system designers).

Where multiple persons are involved in the installation or design of a solar PV system, we propose that a designated 'lead installer' and 'lead designer' must be identified for each installation. These individuals:

- are responsible for signing the declaration on the VEEC assignment form, confirming that the system was designed and installed in accordance with relevant standards and program requirements
- must be registered with the commission before any VEECs are created for systems installed under this activity.

Proposed training and competency requirements for solar system designers

A solar system designer is responsible for:

- planning and designing the solar PV system layout
- ensuring the solar system meets Australian Standards and local grid requirements
- selecting approved panels and inverters
- producing documentation that supports system performance, safety, and compliance

The table below outlines the proposed accreditations that a solar system designer must hold to design C&I solar PV systems for installation in the VEU program.

Table 3: Proposed training and competency requirements for solar system designers

| Accreditation | Detail |
|---|--|
| Solar Accreditation Australia (SAA) accreditation | <p>All C&I solar PV installations must be designed by a person who holds current SAA accreditation in one of the following categories:</p> <ul style="list-style-type: none"> • Grid Connected PV (GCPV) Design Only, or • GCPV Design & Installation. |

Proposed training and competency requirements for solar system installers

A solar system installer is responsible for the safe and correct installation of solar PV systems in accordance with relevant legislation (including the *Electricity Safety Act 1998*), relevant Australian Standards (including AS/NZS 3000 Wiring rules) and Solar Accreditation Australia (SAA) requirements.

The table below outlines the proposed qualifications, accreditations and training that installers must hold/complete to install systems under the new VEU C&I solar activity.

Table 4: Proposed training and competency requirements for solar system installers

| Licence/accreditation | Detail |
|---------------------------|---|
| SAA accreditation | <p>Installation of the solar PV systems must be undertaken by a person who holds current SAA accreditation in one of the following categories:</p> <ul style="list-style-type: none"> • GCPV Installation Only, or • GCPV Design & Installation. |
| Licensed electrician | <p>All electrical work involved in installation of the solar PV systems must be undertaken by a licensed electrician (A Grade).</p> <p>An apprentice electrician or supervised electrical worker can perform the work if supervised by a licensed electrician pursuant to section 39 of the <i>Electricity Safety Act 1998</i> and Regulation 507 of the Electricity Safety (General) Regulations 2019.</p> |
| Working at heights/safely | <p>All persons undertaking installation of the solar PV systems must have successfully completed one of the following units of competency:</p> <ul style="list-style-type: none"> • VU23631 Work safely on roofs with renewable energy systems, or • VU22744 Work Safely in the Solar industry. |
| White card | <p>All persons undertaking installation of the solar PV systems must have successfully completed one of the following units of competency:</p> |

- CPCWHS1001 Prepare to work safely in the construction industry , or
- CPCWHS1001 Prepare to work safely in the construction industry.

Consultation questions – proposed training and competency requirements:

1. Do you support the proposed training and competency requirements for solar system designers involved in this activity? Yes/No
2. If you selected “No” to Question 1, please explain why the proposed solar system designer requirements may not align with current industry practices and suggest alternate designer requirements.
3. Do you agree with the proposed training and competency requirements for solar system installers involved in this activity? Yes/No
4. If you selected “No” to Question 3, please explain why the proposed solar installer system requirements may not align with current industry practices and suggest alternate installer requirements.

2.2. Record-keeping requirements

To create Victorian energy efficiency certificates (VEECs) under the commercial and industrial solar PV system activity, accredited providers must collect and maintain records that are specified by the commission in the VEET Guidelines. These records must:

- reflect the information included in an accredited person’s VEEC creation form
- be kept for a period of six years
- be made available to the commission upon request.

Proposed record-keeping requirements

We propose accredited persons collect and retain the following records for all C&I solar activities, as set out table 5 below. These will be mandatory record-keeping requirements in accordance with section 72 of the VEET Act.

Table 5: Proposed record-keeping requirements for commercial and industrial solar PV system activities

| Requirement | Documentation | Description |
|-------------|---------------|-------------|
|-------------|---------------|-------------|

| | | |
|--|---|---|
| Assignment of rights to create VEECs | VEEC assignment form | <ul style="list-style-type: none"> All fields in the VEEC assignment form must be completed and signed by the AP, the lead solar system designer, lead solar system installer and energy consumer, including signing of declarations as listed in the VEEC assignment form. See Appendix A draft of the proposed VEEC assignment form for this activity. |
| Proof of information provided to energy consumer | Consumer quote and site-specific design and performance information | <p>The consumer quote and site-specific design and performance information must include:</p> <ul style="list-style-type: none"> full system specifications, including quantity, make and model of all components number of the solar modules and inverter/s proposed for installation written advice from the relevant DNSP regarding applicable feed-in tariffs and any export constraints (as relevant) expected system performance, including one or more of the following: <ul style="list-style-type: none"> expected payback period projected energy savings or expected cost savings total price of the eligible system VEEC incentive and other incentive amounts (e.g. STCs) to be applied; and the amount to be paid by the energy customer, including any upfront deposit required to be paid prior to the scheduled installation of the solar PV system activity. |
| Proof of commercial transaction | Tax invoice | <p>A valid tax invoice for the work carried out including:</p> <ul style="list-style-type: none"> the name, address, and Australian Business Number (ABN) of the supplier business the name, address, and ABN/Australian Company Number (ACN) of the energy consumer the date of issue of the invoice the installation address the brand(s) and model(s) of all installed solar PV modules and quantity installed |

| | | |
|-----------------------|--|--|
| | | <ul style="list-style-type: none"> the brand(s) and model(s) of all installed inverters and quantity installed the brand(s) and model(s) of all installed batteries and quantity installed (if batteries are installed) the price of the system installed (before VEEC incentive is applied) the VEEC incentive and other incentive amounts (e.g. STCs) applied the amount paid by the energy consumer (after VEEC incentive and other incentives are applied). |
| Approved installer(s) | Geo-tagged photos of approved installer(s) with photo identification | <ul style="list-style-type: none"> Pre-installation photo of the installer - Taken in front of premises or business signage before any work begins, Mid-installation photo of the installer - During inverter setup/mounting, installation of panels or racking going down. Post-installation/commissioning photo of the installer - During commissioning of inverter, completion of panel installations or system demonstration with the authorised signatory (energy consumer). <p>Where multiple installers are involved in a solar PV installation, each installer must provide photo evidence of their attendance on site at the relevant installation stage they attended, if requested. Photos can include more than one installer. The photos must clearly show:</p> <ul style="list-style-type: none"> the stage of installation the approved installers' face and their photo identification. |
| Upgrade product(s) | Technical specification/data sheet(s) | <p>Manufacturer datasheets must be supplied for each of the following installed components:</p> <ul style="list-style-type: none"> Inverter(s) PV module(s) Battery (if applicable) <p>Each datasheet must clearly display the product model, electrical specifications, and relevant certifications.</p> |
| Upgrade product(s) | Geo-tagged photos of | <p>The photos must show:</p> <ul style="list-style-type: none"> the mounted inverter in its installed location |

| | | |
|--|--|---|
| | installed inverter(s) | <ul style="list-style-type: none"> the brand and model of the inverter(s) the serial number on the inverter label(s) (clearly visible and legible). |
| Upgrade product(s) | Geo-tagged photos of installed panels | <p>The photos must show:</p> <ul style="list-style-type: none"> all newly installed panels at the installation site the brand and model of the panel(s) as many panels in frame as possible. <p>At least one photograph to be an aerial or elevated photograph capturing the full array.</p> |
| Upgrade product(s) (as required) | Geo-tagged photos of installed batteries | <p>The photos must show:</p> <ul style="list-style-type: none"> the mounted battery unit(s) in its installed location the serial number on the battery label (clearly visible and legible). the brand, model and size of the battery |
| Installation requirement – monitoring system | <p>A video of the active monitoring portal</p> <p>OR</p> <p>Report output from the monitoring portal</p> | <p>The video (less than 2GB in size) must clearly show the monitoring portal interface showing:</p> <ul style="list-style-type: none"> live system data measuring energy generation of the solar system, system performance and energy consumption on site. the address or NMI where the solar PV system has been installed. <p>The report output must include:</p> <ul style="list-style-type: none"> data showing energy generation of the solar system, system performance and energy consumption on site the address or NMI where the solar PV system has been installed. |
| Compliance | Certificate of electrical safety (CoES) | <p>The CoES must clearly detail the work performed and must include:</p> <ul style="list-style-type: none"> type and quantity of components installed (e.g. panels, inverter model, battery system) whether the work involved a new installation, upgrade, or replacement system configuration (e.g. description of system layout). |

| | | |
|---|------------------------------------|---|
| Compliance – solar system design and installation | Single-line diagram (SLD) | <p>The single-line diagram must be in electronic format and include:</p> <ul style="list-style-type: none"> • title block, containing: <ul style="list-style-type: none"> – drawing name, unique drawing number – date and version number – solar system designer and authoriser name – site address and national meter identifier (NMI) • key/legend to single-line diagram • system details, including: <ul style="list-style-type: none"> – total system size (kW/kVA) – number and model of solar panels – number and model of inverters – battery system details (if applicable): capacity in kWh, coupling type, battery management system – export control settings and limits – phases involved (single-phase or three-phase) • electrical configuration details, including: <ul style="list-style-type: none"> – electrical configuration (including string configuration) – wiring from panels to inverter, inverter to site loads, and inverter to grid – all switchboards (e.g. MSB, DB, PVDB) clearly labelled – main solar and battery isolators (must be lockable with a padlock and labelled) – point of supply and boundary to DNSP network – circuit breakers, anti-islanding protection, contactors, CT/VT connections, earth and neutral connections and communication links – energy management system and export limiting devices – Clearly marked backup/essential loads circuit and non-essential loads circuit (if used). • Labels distinguishing between existing and new components of the solar installation. |
| Compliance – proof the system is | Document evidencing system is DNSP | <p>The document must show:</p> |

installed,
operational and
capable of
generating
electricity

connected (e.g.
DNSP approval/
commissioning
document, meter
reconfiguration
and activation
document)

- the NMI or address confirming the specific site where the solar upgrade has been installed
- date of connection/energisation.

Consultation questions – proposed record-keeping requirements:

5. Do you support the proposed record-keeping requirements for this activity? Yes/No
6. If you answered “No” to Question 5, please specify which record requirement(s) you have concerns with and explain why.
7. Do you have suggestions for alternate record-keeping requirements that would better support compliance with the activity requirements? Please list them if you do.
8. 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
9. If you answered “Yes” to Question 18, please specify what different record-keeping requirements you believe should be set based on system size.
10. Do you support the proposed VEEC assignment form information requirements for this activity (see appendix A)? Yes/No
11. If you answered “No” to Question 10, please outline what aspects of the proposed VEEC assignment form you believe should be amended.

2.3. Proposed accreditation related guidance and conditions of accreditation for C&I solar activity

Proposed guidance on the commission’s expectations in assessing whether a person is competent and capable for the purposes of accreditation to undertake the C&I solar activity

Business who wish to create VEECS for the C&I solar activity, must apply to the commission to either:

- become a new AP to undertake the C&I solar activity (if not already an existing accredited person under the program);
- vary their accreditation conditions to include the C&I solar activity; or

- undertake the C&I solar activity as part of their application for renewal of accreditation.

When applying for accreditation, renewal or accreditation or variation of accreditation conditions, we will assess whether as applicant is 'fit and proper' and 'competent and capable' to be accredited to undertake the activities for which they are applying.

Section 10C of the VEET Act sets out matters the commission may have regard to in determining whether a person is competent and capable, including:

- the skills and expertise of the person exercising powers and performing duties as an accredited person, including undertaking a prescribed activity
- whether the person and any contractors or employees engaged by the person have appropriate professional accreditations for undertaking a prescribed activity or part of a prescribed activity.

We propose the following matters against which the commission may assess whether a person is competent and capable to be accredited to under the C&I solar activity as set out in table 6 below:

Proposed competent and capable matters under section 10C of the VEET Act

Skills and expertise of the accredited person

It is the commission's expectation that the applicant satisfies one of the following two options:

Option 1:

- The Applicant to have been operating as a company for a minimum of two years in the solar industry at the time of accreditation application, including in at least one of the following areas:
 - Experience in the management, design and/or installation of commercial-scale solar PV systems (30 kW – 200 kW)
 - Experience managing or delivering solar upgrade projects under the Measurement and Verification (M&V) Method under Project Based Activities of the VEU Program
 - Accreditation in at least one of the following government solar programs:
 1. Solar Victoria (SV) – Registered Solar Retailer
 2. Small-scale Renewable Energy (SRES) scheme
 3. Large-scale Renewable Energy Target (LRET) scheme
 4. New Energy Tech Consumer Code (NETCC) approved seller

Option 2:

- The Applicant to have been operating as a company for a minimum of two years;

- The Applicant to have employee(s) who are engaged in undertaking the installation or ensuring compliance of the install having a minimum of two years experience in the solar industry, including include in at least one of the following areas:
 - Experience in the management, design and/or installation of commercial-scale solar PV systems (30 kW – 200 kW)
 - Experience in the management, design and/or installation of solar systems in at least one of the following government-accredited solar programs:
 - Solar Victoria (SV)
 - Small-scale Renewable Energy Scheme (SRES)
 - Large-scale Renewable Energy Target (LRET)

Having appropriate accreditations to undertake the C&I solar activity

It is the commission's expectation that the applicant has:

- at least one employee who holds Solar Accreditation Australia (SAA) accreditation for GCPV Design and Installation; and/or
- contracts in place for design and installation with a company where their employees hold Solar Accreditation Australia (SAA) accreditation for GCPV Design and Installation.

Potential accreditation condition considerations for feedback

The commission may also prescribe activity specific accreditation conditions, depending on the complexity and risk profile of a prescribed activity under the VEU program. Accredited persons must comply with prescribed accreditation conditions when participating in the VEU program.

We are considering whether accreditation to undertake the C&I solar activity should be subject to a condition requiring a quality assurance review prior to the creation of certificates, to help ensure compliance and integrity of this activity.

Consultation questions – proposed accreditation related guidance and conditions

12. 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
13. If you answered “No” to Question 1, please specify which matters you disagree with and explain why.
14. Do you have suggestions for alternative matters the commission should consider in assessing whether an applicant is competent and capable to deliver the C&I solar activity? Please list them if you do.
15. 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

creation as a practical and effective measure to support compliance and program integrity? Yes/No

16. If you answered “Yes” to Question 15, who do you believe should be responsible for conducting the quality assurance review (i.e. what skills or qualifications should the person hold)? What sort of checks should be included in the quality assurance review?
17. If you answered “No” to Question 15, please explain why.
18. Do you have any suggestions for alternative accreditation conditions you believe should be introduced for businesses participating in this activity to further strengthen compliance, quality assurance, and program integrity? Please list them if you do.

3. Summary of consultation questions

Stakeholders are invited to provide feedback on the questions below by completing the [consultation submission form](#) or by emailing responses to veu@esc.vic.gov.au, using the subject line “Consultation submission – C&I solar system activity”. This consultation will close on **16 October 2025**.

Consultation questions – proposed training and competency requirements

1. Do you support the proposed training and competency requirements for solar system designers involved in this activity? Yes/No
2. If you selected “No” to Question 1, please explain why the proposed solar system designer requirements may not align with current industry practices and suggest alternate designer requirements.
3. Do you agree with the proposed training and competency requirements for solar system installers involved in this activity? Yes/No
4. If you selected “No” to Question 3, please explain why the proposed solar installer system requirements may not align with current industry practices and suggest alternate installer requirements.

Consultation questions – proposed record-keeping requirements

5. Do you support the proposed record-keeping requirements for this activity? Yes/No
6. If you answered “No” to Question 5, please specify which record requirement(s) you have concerns with and explain why.
7. Do you have suggestions for alternate record-keeping requirements that would better support compliance with the activity requirements? Please list them if you do.
8. 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
9. If you answered “Yes” to Question 18, please specify what different record-keeping requirements you believe should be set based on system size.
10. Do you support the proposed VEEC assignment form information requirements for this activity (see appendix A)? Yes/No
11. If you answered “No” to Question 10, please outline what aspects of the proposed VEEC assignment form you believe should be amended.

Consultation questions – proposed accreditation related guidance and accreditation conditions

12. 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
13. If you answered “No” to Question 1, please specify which matters you disagree with and explain why.
14. Do you have suggestions for alternative matters the commission should consider in assessing whether an applicant is competent and capable to deliver the C&I solar activity? Please list them if you do.
15. 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 creation as a practical and effective measure to support compliance and program integrity? Yes/No
16. If you answered “Yes” to Question 15, who do you believe should be responsible for conducting the quality assurance review (i.e. what skills or qualifications should the person hold)? What sort of checks should be included in the quality assurance review?
17. If you answered “No” to Question 15, please explain why.
18. Do you have any suggestions for alternative accreditation conditions you believe should be introduced for businesses participating in this activity to further strengthen compliance, quality assurance, and program integrity? Please list them if you do.

4. Next steps

We will consider your feedback in finalising our guidance and administrative requirements for the C&I solar activity under the VEU program. Key milestones in finalising our administrative framework for this activity are listed below.

| Date | Milestone |
|-----------------|---|
| 2 October 2025 | Open stakeholder consultation |
| 16 October 2025 | Consultation closes |
| 24 October 2025 | Complete review of stakeholder submissions |
| 29 October 2025 | Finalise guidance and record-keeping requirements |
| 31 October 2025 | Release of our program guides and accreditation application forms on the commission website |

Appendix A – Draft VEEC Assignment Form Template: Commercial and Industrial Solar Photovoltaic (PV) System (Activity 47) - Business and Non-Residential Premises

Version 1 - Date TBC

Instructions for APs (APs) on using this template

You must complete a VEEC assignment form to record the assignment of rights for the certificates from the energy consumer to your organisation for an activity under the Victorian Energy Upgrades program.

In using this VEEC assignment form template, you will need to:

- include **all** of the information and fields as outlined in Sections 1, 2 and 3 below into your own document to ensure compliance with the legislation
- customise the form to add your company logo and contact details
- customise the form if you wish the form to accommodate more than one activity
- ensure that all content in the form is legible to the consumer (e.g., minimum font size of Arial 9 or equivalent).

Do not change the words or add additional items to the declaration (e.g., your own terms and conditions) – except when customising a form to accommodate more than one activity.

Submitting your VEEC assignment form for approval

As part of the accreditation application process, you must provide a copy of your form for review to the commission. We may also require that you submit your forms to us for approval where updates are made to the assignment form template (as required). If you are customising your form to accommodate more than one activity, we recommend that you submit your form for review to us.

Providing a copy of your VEEC assignment form to consumers

You must provide a copy of the VEEC assignment form (or a document containing the same information) to consumers at the time of signing (written assignment) or within 10 business days (electronic assignment).

START OF TEMPLATE

Section 1: Consumer rights information

As the energy consumer, you own the rights to create certificates for energy saving activities undertaken at your premises under the Victorian Energy Upgrades program. One certificate represents one tonne of carbon dioxide equivalent (CO₂-e) to be reduced by the activity.

You are able to assign your right to create certificates to an accredited provider under the Victorian Energy Upgrades program. In assigning your right, the accredited provider will be entitled to create and own the certificates for the activity undertaken at your premises. In return, the accredited provider should provide you with an identifiable benefit (e.g., price reduction on a product or a cash-back arrangement).

You are responsible for ensuring you are satisfied with the terms of the assignment of certificates to <insert name of accredited person>, the accredited provider (as detailed below) prior to proceeding with the activity.

If you experience any issues with the outcome of this activity, you should contact <insert name of accredited person> to resolve the matter. For any outstanding issues, you can contact program staff members at the Essential Services Commission, the government body responsible for administering the program, by sending an email to veu@esc.vic.gov.au.

Section 2: Installation and personnel details

Part A: Eligibility checklist

| Upgrade eligibility factors | |
|--|--------------------------|
| The site is not a scheduled activity premises. | <input type="checkbox"/> |
| The site is a scheduled activity premises. I declare that the appropriate notification of intention to undertake prescribed activity has been made to the Essential Services Commission and the activity was undertaken after the date of notification pursuant to Regulations 27 and 28 of the Victorian Energy Efficiency Target Regulations 2018. | <input type="checkbox"/> |

Part B: Accredited person, solar system designer and solar system installer details

| Accredited person details |
|---------------------------|
| Full name: |
| Company name: |
| Company address: |
| Phone number: |

Solar system designer details¹

Full name:

Company name:

Company address:

Phone number:

SAA Accreditation number:

SAA accreditation type: ☐ GCPV Design ☐ GCPV Design and Install

I am ☐ an employee of the accredited person ☐ contracted by the accredited person ☐
employed by/contracted by a third party installer company

Solar system installer details² (Duplicate this table as required, so that details are completed for all installers involved in undertaking the activity)

Full name:

Company name:

Company address:

Phone number:

SAA Accreditation number:

SAA accreditation type: ☐ GCPV Install ☐ GCPV Design and Install

Electrician licence number:

I am: ☐ an employee of the accredited person ☐ a contracted by the accredited person ☐
employed by/contracted by a third party installer company

Part C: Installation details

Site and date details

¹ Where there are multiple solar system designers undertaking the activity, provide details of the 'lead' solar system designer in this table. This 'lead' solar system designer is responsible for signing the relevant declaration below.

² Duplicate this table as required, so that details are completed for all solar system installers involved in undertaking the activity. The lead solar system installer is responsible for signing the relevant declaration below.

| |
|--|
| National Meter Identifier (NMI): ³ |
| Installation site address: |
| Installation commencement date: |
| Date system was energised: |
| Certificate of electrical safety (COES) number: |
| System mounting type: (select all applicable types) <input type="checkbox"/> Rooftop solar (single-story) <input type="checkbox"/> Rooftop solar (multi-story) <input type="checkbox"/> Solar canopy <input type="checkbox"/> Ground-mounted solar <input type="checkbox"/> Floating solar |
| The solar PV system installed is: <input type="checkbox"/> Replacing an existing system <input type="checkbox"/> Upgrading an existing system <input type="checkbox"/> Installing a new system |
| Is the system connected to a battery? <input type="checkbox"/> Yes – New battery installed <input type="checkbox"/> Yes – Existing battery integrated with this system <input type="checkbox"/> No battery connected |
| Total solar PV module rated power output (kW): |
| Total inverter nominal AC power output (kW): |
| Total inverter manufacturer's maximum allowable array size (kW): |
| Total connected inverter capacity (kVA): |

³ Only one solar PV system can be installed per single NMI for each VEEC creation claim for the C&I solar activity. If solar systems are being connected to multiple NMIs at the one site address, you will need to complete a separate assignment form and VEEC creation form for each NMI.

| Installed PV module product details (duplicate as required) | |
|---|------------------------|
| Brand: | Model: |
| Number of modules: | Module serial numbers: |
| Solar PV module rated power output (kW): | |

| Installed inverter product details (duplicate as required) | |
|--|--|
| Brand: | Model / series: |
| Number of inverters: | Inverter serial numbers: |
| Inverter nominal AC power output (kW): | Inverter manufacturer's maximum allowable array size (kW): |

| Attachments (or evidence collected) | |
|--|--|
| Technical specification(s)/data sheet(s): | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Single-line diagram: | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Consumer quote and site-specific design and performance information: | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Tax invoice/proof of purchase: | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Photo evidence (as per activity guide): | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Certificate of electrical safety | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Evidence of DNSP connection approval | <input type="checkbox"/> Yes <input type="checkbox"/> No |

| Form of benefit provided |
|---|
| <input type="checkbox"/> Upfront cash <input type="checkbox"/> Price reduction <input type="checkbox"/> Delayed cash <input type="checkbox"/> Other (please describe) |
| Amount of benefit provided for assignment of certificates: |

Section 3: Declarations

Part A: Accredited person declaration

I <insert name> am the authorised representative of <insert name of accredited person> and declare that:

- all scheme participants involved in undertaking this activity comply with the relevant training and competency requirements as specified in the VEET Guidelines
- all solar PV modules and inverters installed appear on the Clean Energy Council's approved product lists at the time of installation.

- if the system installed was between 30kW to 100kW, the PV module product brand is listed as a participant in the Solar Panel Validation Initiative (SPVI)
- the system installed supports a monitoring portal capable of tracking system performance, system energy production and system energy consumption and is accessible by the user.
- the consumer has been provided with a copy of the warranty against defects (with a minimum period of 10 years) for any solar PV module product(s) installed.
- the consumer has been provided with a copy of the warranty against defects (with a minimum period of 5 years) for any inverter product(s) installed.
- the solar PV system was sized and installed in accordance with Solar Accreditation Australia requirements, relevant laws and Australian standards
- the solar PV system is complete and generating electricity
- the solar PV system installed is connected to the grid and has met the obligations under the contract (or quote accepted) relating to the connection of the unit to the grid
- the above activity was not undertaken at a scheduled activity premises listed on the Essential Services Commission's Register of Scheduled Activity Premises on the VEU Registry. If undertaken at a scheduled activity premises, I declare that the appropriate notification of intention to undertake prescribed activity has been made to the Essential Services Commission
- the information supplied in this form is complete and accurate and I am aware that it is an offence to provide false or misleading information to the Essential Services Commission under the *Victorian Energy Efficiency Target Act 2007*.

Name:

Signature:

Date:

Part B: Solar system designer declaration

I declare that:

- I was the accredited designer of the solar PV system installed at <insert installation site address> and verify that I comply with the training and competency requirements for persons undertaking designs of commercial and solar PV systems under the VEU program
- the solar PV system has been sized and designed:
 - in accordance with all relevant Australian standards and SAA requirements for the design and installation of grid-connected solar PV systems
 - in compliance with all local and state government requirements for the installation of the unit including the sighting of the unit and attachment to the building or structure.
- the information supplied in this form is complete and accurate and I am aware that it is an offence to provide false or misleading information to the Essential Services Commission under the *Victorian Energy Efficiency Target Act 2007*.

Lead Designer full name:

Lead Designer signature:

Date:

Part C: Solar system installer declaration

I declare that:

- I was the lead installer of the solar PV system installed at <insert installation site address> and verify that I comply with the training and competency requirements for persons undertaking installations of commercial and solar PV systems under the VEU program
- all work undertaken in respect of installing the solar PV system was undertaken by persons who comply with the training and competency requirements for persons undertaking installations of commercial and solar PV systems under the VEU program
- the solar PV system has been installed:
 - in accordance with Solar Accreditation Australia requirements for the design and installation of grid-connected solar PV systems.
 - in compliance with the relevant Distributed Network Service Provider (DNSP) negotiated connection contract
 - in accordance with all relevant laws and Australian standards, including all local and state government requirements for the installation of the unit including the sighting of the unit, the attachment to the building or structure (if applicable) and the grid connection of the system installation
- I have provided the owner of the unit with any documents required by Victorian laws certifying that the installation of the unit complies with the relevant laws relating to safety and technical standards.
- I received a copy of the design of the unit and:
 - ☐ The design was not modified during the installation of the unit and it was installed in all material aspects, in accordance with the design, or
 - ☐ The design was modified during the installation of the unit and the modifications were consistent with all relevant requirements of the accreditation scheme for the design of the unit and that the unit was installed, in all material aspects, in accordance with the modified design. The unit will perform consistently with the design or modified design (as applicable).
- the information supplied in this form is complete and accurate and I am aware that it is an offence to provide false or misleading information to the Essential Services Commission under the *Victorian Energy Efficiency Target Act 2007*.

Lead Installer full name:

Lead Installer signature:

Date:

Section 4: Consumer details and declaration

Part A: Consumer details

Consumer details

Full name:

Business/company name:

ABN/ACN: □□□□□□□□□□

Industry/business type*:

Phone:

Address:

** Please fill in, or alternatively leave blank and tick one of the categories listed in Appendix A of this form.*

Part B: Declaration by consumer or authorised representative

I declare that:

- I am the energy consumer or I am authorised to make this declaration on behalf of the above entity that is the consumer
- the above entity is the energy consumer of the premises at the above installation address
- to the best of my knowledge, the information in Section 2 is complete and accurate
- that the above activity was not undertaken at a scheduled activity premises listed on the Essential Services Commission's Register of Scheduled Activity Premises on the VEU Registry
- If undertaken at a scheduled activity premises I declare that the appropriate notification of intention to undertake prescribed activity has been made to the Essential Services Commission
- I understand that by signing this form I am assigning the right to create certificates for the installation to <insert name of accredited person>
- I have received an identifiable benefit from <insert name of accredited person> in exchange for assigning my rights to create the certificates for the above installation
- I have (or the above entity has) access to a monitoring portal connected to the installed system, capable of tracking system performance, system energy production and system energy consumption

- the Essential Services Commission has the right to inspect the installation with reasonable notice
- I understand that information on this form will be disclosed to the Essential Services Commission for the purpose of creating certificates under the *Victorian Energy Efficiency Target Act 2007* and for related verification, audit and program monitoring purposes
- I understand that the Essential Services Commission may use the details provided on this form to issue commission correspondence
- I am aware that it is an offence to provide false or misleading information to the Essential Services Commission or any person exercising powers under or in connection with the Victorian Energy Efficiency Target Act 2007.

Consumer (or authorised representative) signature:

Date:

Name:

Position:

Company name:

Phone number:

Email address:

Appendix A: Industries/business types

(Please tick one or manually fill in the “Industry / business type” field in Section 4, Part A)

- | | | |
|----|---|--------------------------|
| 1 | Accommodation services | <input type="checkbox"/> |
| 2 | Administrative & support services | <input type="checkbox"/> |
| 3 | Agriculture, forestry & fishing | <input type="checkbox"/> |
| 4 | Arts and entertainment - cinema, art gallery & creative | <input type="checkbox"/> |
| 5 | Construction - building & other | <input type="checkbox"/> |
| 6 | Construction - land & site preparation | <input type="checkbox"/> |
| 7 | Education - community | <input type="checkbox"/> |
| 8 | Education - preschool, childcare & kindergarten | <input type="checkbox"/> |
| 9 | Education - primary school & high school | <input type="checkbox"/> |
| 10 | Education - tertiary | <input type="checkbox"/> |
| 11 | Electricity, gas, water & waste services | <input type="checkbox"/> |
| 12 | Financial services - banks | <input type="checkbox"/> |
| 13 | Food & beverage services | <input type="checkbox"/> |
| 14 | Government bodies & agencies | <input type="checkbox"/> |
| 15 | Hair and beauty | <input type="checkbox"/> |
| 16 | Health care and assistance - hospitals | <input type="checkbox"/> |
| 17 | Health care and assistance - medical & other | <input type="checkbox"/> |
| 18 | Information media and telecommunications | <input type="checkbox"/> |
| 19 | Internet service providers & data processing services | <input type="checkbox"/> |
| 20 | Library and other information services | <input type="checkbox"/> |
| 21 | Manufacturing - clothing, textiles & footwear | <input type="checkbox"/> |
| 22 | Manufacturing - food & drinks | <input type="checkbox"/> |
| 23 | Manufacturing - furniture | <input type="checkbox"/> |
| 24 | Manufacturing - other | <input type="checkbox"/> |
| 25 | Manufacturing - petroleum & coal | <input type="checkbox"/> |
| 26 | Manufacturing - pulp, paper & paperboard | <input type="checkbox"/> |
| 27 | Mining | <input type="checkbox"/> |
| 28 | Other | <input type="checkbox"/> |
| 29 | Postal services | <input type="checkbox"/> |
| 30 | Professional services | <input type="checkbox"/> |
| 31 | Real estate services | <input type="checkbox"/> |
| 32 | Rental & hiring - property operators/hire facilities | <input type="checkbox"/> |
| 33 | Retail trade - food retailing | <input type="checkbox"/> |
| 34 | Retail trade - fuel retailing | <input type="checkbox"/> |
| 35 | Retail trade - motor vehicle | <input type="checkbox"/> |
| 36 | Retail trade - online non store based | <input type="checkbox"/> |
| 37 | Retail trade - store-based | <input type="checkbox"/> |
| 38 | Sports & recreation - gym, sports clubs & other | <input type="checkbox"/> |
| 39 | Transport services | <input type="checkbox"/> |
| 40 | Warehousing & storage services | <input type="checkbox"/> |
| 41 | Wholesale trade - grocery & other | <input type="checkbox"/> |
| 42 | Wholesale trade - machinery & equipment | <input type="checkbox"/> |
| 43 | Wholesale trade - motor vehicle & parts | <input type="checkbox"/> |
| 44 | Wholesale trade - other goods | <input type="checkbox"/> |

END OF TEMPLATE