

# Stakeholder engagement summary: Consultation on guidance and requirements for commercial and industrial solar photovoltaic system activities under the Victorian Energy Upgrades program

## Background

The Essential Services Commission recently consulted with Victorian Energy Upgrades (VEU) program participants and industry on administrative settings for the new commercial and industrial solar photovoltaic (PV) system activity (C&I solar activity) that commenced on 29 September 2025.

This is to ensure our guidance and administrative requirements for this activity strike the right balance between protecting consumers, maintaining program integrity and minimising the red tape burden for participating businesses, while also aligning with established industry practices and standards where possible.

The new C&I solar activity enables Victorian energy efficiency certificates (VEECs) to be created for the installation of solar systems that are between 30 to 200 kilowatts (kW) in size at commercial and industrial premises.

## How we engaged



### Key dates

- 2 October 2025: consultation released
- 16 October 2025: consultation closed
- 24 October 2025: review of submissions completed
- 31 October 2025: release of program guides and accreditation application forms.



### Methodology

We published a [consultation paper](#) on the commission website and invited feedback on the following:

- 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.

Submissions could be made either through an online consultation form or by email. All stakeholders on the program's mailing list were notified of the consultation via email.



#### **Number of submissions received (online, written)**

Submissions were received from 14 stakeholders, comprising:

- 8 accredited providers
- 2 solar providers
- 3 industry bodies
- 1 relevant entity.

## **Summary of feedback**

Stakeholder feedback was mainly supportive of the proposed requirements outlined in the consultation paper. Key feedback themes are summarised below.

| Consultation item                                            | Feedback themes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| Training and competency requirements for scheme participants | <ul style="list-style-type: none"> <li>• 12 stakeholders (86 per cent of respondents) support the proposed training and competency requirements for solar system designers. One stakeholder provided feedback unrelated to the proposed designer requirements.</li> <li>• 10 stakeholders (71 per cent of respondents) support the proposed training and competency requirements for solar system installers.</li> <li>• Four stakeholders offered suggestions to align requirements set by the Clean Energy Regulator (CER) and Solar Accreditation Australia (SAA) requirements to avoid duplication.</li> </ul> |
| Record keeping requirements for accredited persons           | <ul style="list-style-type: none"> <li>• Five stakeholders support the proposed record keeping requirements and five respondents did not support the requirements. Two stakeholders both agreed and disagreed with</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                      |

different aspects of the requirements. Two stakeholders did not provide a relevant response.

- Feedback requested that requirements align with the Small-scale Renewable Energy Scheme (SRES) and Large-scale Renewable Energy Target (LRET) programs administered by the CER.
- Eight stakeholders (57 per cent) felt the record-keeping requirements for solar systems should differ for systems below or above 100kW. Six respondents support consistent requirements across all solar system sizes under the activity.
- Feedback primarily centred on the requirement to provide a single-line (SLD) diagram for systems under 100 kW, with stakeholders requesting alignment of SLD provisions with existing CER requirements.
- Nine stakeholders (64 per cent) support the requirements of the proposed assignment form. Four stakeholders did not. Main feedback related to suggestions to streamline the form through a technological solution. One stakeholder did not provide a response.

#### Competent and capable criteria

- Four stakeholders support the proposed criteria the commission may have regard to when assessing whether an applicant is competent and capable to deliver the C&I solar activity. Three stakeholders offered alternative requirements. One stakeholder did not provide a response.
- The other six stakeholders either requested clarification on the criteria or provided feedback on the criteria set under the activity's streamlined accreditation pathway which was not relevant to matters being consulted on.

#### Accreditation conditions

- Nine stakeholders (64 per cent of respondents) support the inclusion of an accreditation condition requiring an accredited persons to undertake a quality assurance review of the activity prior to VEEC creation.
- Three stakeholders did not support the accredited person undertaking the assurance review and suggested different models.
- One stakeholder required additional information to confirm whether they supported the proposed accreditation condition.

## How feedback has been incorporated into the commission's regulatory settings for the C&I solar activity

The table below details how we have incorporated feedback into the regulatory settings for the C&I solar activity. This includes amendments we have made to our training and competency requirements for scheme participants, record-keeping requirements, and competent and capable criteria.

We have also shared stakeholder feedback that relates to policy matters to the department for consideration, as the policy owners of the program.

| Consultation item                                            | Amendments made reflecting stakeholder feedback                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| Training and competency requirements for scheme participants | <ul style="list-style-type: none"> <li>Amended requirement for SAA accreditation to only be mandatory for lead solar system designers and installers.</li> <li>Inclusion of working from heights safety competency requirements and white card competency requirements for on-site solar PV workers.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Record keeping requirements for accredited persons           | <ul style="list-style-type: none"> <li>Revisions to the information required on the consumer quote and site-specific design and performance information document.</li> <li>Updated geo-tagged photo of installer requirement to only require collection of photos of the lead installer and to remove requirement for photo identification to be captured at all stages of an installation.</li> <li>Revision to geo-tagged photo(s) of installed panels requirement to allow multiple aerial or elevated photographs to be captured.</li> <li>Revision to geo-tagged photos of installed battery systems requirement to simplify the evidence the photo must capture.</li> <li>Update to record requirement for system's monitoring portal to allow for geo-tagged photos of the portal.</li> <li>Revisions to SLD requirements to simplify what the SLD must include.</li> <li>Update to the VEEC assignment form to clarify scanned images of PV modules and inverter serial numbers may be attached to the assignment forms.</li> </ul> |
| Competent and capable criteria                               | <ul style="list-style-type: none"> <li>Amended 'skills and expertise' criteria to allow applicants to either have employees with a minimum of two years solar</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

experience or to have contracts in place with solar companies with a minimum of two years solar experience.

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| Accreditation conditions | <ul style="list-style-type: none"> <li>Confirmed that accreditation conditions may be imposed as part of an accreditation or variation of accreditation conditions approval to undertake C&amp;I solar activity to manage risk. Example accreditation conditions may include reporting on quality assurance activities, undertaking independent inspections of installations or meeting additional compliance assurance requirements prior to certificate creation</li> </ul> |
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## Activity guide and forms for C&I solar activity

Information by consultation feedback, we released new program guides, accreditation application forms and VEEC assignment forms incorporating our regulatory requirements for the C&I solar activity on 31 October 2025. You can access these documents here:

- [Commercial and Industrial Solar Photovoltaic System activity page](#)
- [How to become a VEU accredited person page.](#)

## More information

Please refer to these documents released by the Department of Energy, Environment and Climate Action (the department) for more information about the new C&I solar activity:

- [\*Victorian Energy Efficiency Target Amendment \(Commercial and Industrial Solar, High Efficiency Motors and Other Matters\) Regulations 2025\*](#)
- [\*Victorian Energy Upgrades \(VEU\) Specifications \(version 21\).\*](#)