

Submission to the Victorian Government Energy Safety Review Consultation

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About RACV

RACV welcomes the opportunity to respond to the Victorian Government's Energy Safety Review Consultation.

Representing over 2.3 million members and an additional 500,000 customers, RACV exists to improve lives in the areas of home, cleaner energy, motoring and leisure.

RACV is committed to helping Australians transition to a cleaner energy future. We offer cleaner energy products and services including solar panels and batteries through RACV Solar. RACV Solar is now one of the largest installers of solar power, both commercial and residential, on the east coast of Australia and is one of the largest installers of home batteries in Victoria.

RACV is an electric vehicle charger network operator with locations at RACV Clubs and resorts and public locations across Victoria. In 2025, a comprehensive upgrade was completed to enhance speed and reliability. Each RACV charging site also features CCTV security cameras to provide a safer environment for members and customers while charging their EV and help prevent vandalism.

RACV has also invested in electric vehicle charging companies JET Charge and Chargefox. Our team of electricians, engineers and project managers design, install and support commercial and residential EV charging infrastructure and provide integrated energy solutions for homeowners, fleet operators and businesses.

RACV delivers expert and tailored commercial energy solutions to help businesses save on energy costs, improve energy resiliency and reliability, reach renewable energy goals, unlock additional revenue streams and maximise return on assets through the energy markets.

Key services include commercial solar, battery storage, EV chargers, renewable energy roadmaps and system operation and maintenance.

This year RACV launched a new product for commercial and industrial customers following our successful installation of one of Australia's first Virtual Power Plant (VPP) of its kind at RACV's Torquay and Inverloch resorts. RACV's own VPP is one of the first to participate in the very-fast Frequency Control Ancillary Services (FCAS) market managed by the energy market operator. This followed the ARENA-supported AEMO VPP Demonstration Project in 2022.

By installing VPPs at our resorts, we have been able to realise a range of commercial benefits such as managing energy costs and generating revenue, at the same time as contributing to grid stability by feeding energy back into the grid during periods of high demand. Delivered in collaboration with PowerSync Technologies, the VPPs aggregate over one megawatt of battery capacity from the Torquay and Inverloch resorts – the storage equivalent of approximately 20 average electric vehicle batteries.

Recommendations

RACV supports the proposed reform options and any measures to further protect and improve the safety of consumers, workers and businesses.

The complexity and pace of the energy transition can have unintended consequences – impact on business costs and ultimately costs to consumers.

<p>Consumer Energy and Battery Resources Safety</p>	<p>Rapid technology improvements and an ongoing fall in costs will pave the way for smarter home charging and electrification solutions (including Vehicle-to-Home and Vehicle-to-Grid).</p> <p>Australia remains relatively immature and unsophisticated in implementing technical standards for electric vehicle charging hardware, particularly in areas like cybersecurity, interoperability, and communication protocols. Failing to manage cyber and privacy risks, or setting a consistent standard, exposes consumers, industry and the electricity network to cyber, privacy and performance risks. Consumers are particularly susceptible, and these risks cannot be adequately mitigated through education.</p> <ol style="list-style-type: none"> 1. The Victorian Government should advocate for the national adoption and regulation of Combined Charging System Combo 2 (CCS2) as the default EV charging system specification and update Australian Design Rules so that any new electric vehicle capable of V2G follows the CCS2 standard and the corresponding communication protocol (ISO 15118). 2. The Victorian Government should consider the cost of inspection to the consumer, additional costs to business and implications for insurance cover and claims when considering potential consequences of mandatory or voluntary inspections to ensure ongoing safety for solar, batteries and EVs used as home storage.
<p>Legislative and institutional reform</p>	<p>The transition to electrification will see both an increase in businesses operating in the renewable energy industry as well as maturity and growth of existing operators working across State and Territory borders. This means that State and Territory-based product and licence regulation has the potential to create regulatory anomalies and increase the complexity and inefficiency of an already complicated regulatory environment particularly for those that operate nationally.</p> <ol style="list-style-type: none"> 3. Streamline the Federal and State compliance and safety regulatory environment. Define clear roles and responsibilities of all Federal and State regulators and government bodies. This should include hierarchy and escalation process/pathways. The Victorian energy safety reform should include how the role of the New Energy Tech Consumer Code and the Clean Energy Council, as the current approved product listing body, interplay with the energy safety reform options and regulatory landscape. 4. Improve communication and processes between Federal and State Governments, regulators and the approved product listing body to guarantee manufacturers are meeting all Australian legislative and regulatory requirements. 5. Update the energy safe regulations to anticipate future technological innovation and enhancement given the increase in consumer energy resources. It is essential that the regulations are aligned with the capabilities of modern energy storage systems to facilitate their adoption and use. 6. The Victorian Government should encourage better collaboration between Governments, Distributed Network Service Providers and industry to identify streamlined connection processes or expedited pathways for projects under specific MW thresholds that support the uptake of consumer energy resources in Victoria. 7. Improve communication to installers and consumers if a manufacturer is not meeting legislative and regulatory requirements. Immediately remove the product from the approved product listing until resolved. Introduce mandatory and stricter timeframes for manufacturers to respond to Government and regulators. 8. Align regulatory responsibilities for rental property energy safety. Although RACV research indicates there is not a critical mass of rental properties with solar energy systems¹ consideration should be given to rental provider obligations in maintaining safe energy storage systems.

¹ RACV Research 2024, n=1,000. Nine per cent of renters indicated that their rental property had solar panels.

Worker licensing and development

The transition away from gas heating solutions will drive a substantial increase in demand for refrigeration-qualified installers. As households shift towards electric heating and cooling systems, the need for licensed and skilled professionals will surge, potentially leading to delays in installations and increased service costs due to labour shortages in the field of refrigeration.

With a predicted 4.8 million gas appliances needing to be replaced, demand for installation services will outpace supply. There is a risk that unqualified individuals may attempt to enter the market. This could lead to unsafe installations, non-compliance with regulations, and an overall decline in the quality of workmanship, potentially endangering consumers and increasing long-term maintenance issues.

In time, the phase-out of gas will leave many gas plumbers without sufficient work, creating an urgent need for workforce transition programs. A six-month training course for experienced gas plumbers (with over five years of experience) could enable them to gain the necessary skills to install and service refrigeration appliances up to 18kW in the residential sector.

9. The ARCTick licensing body should consider introducing a special licence class for gas plumbers. This would help address the skills gap while ensuring job continuity for those affected by the transition.
10. Support for existing State and Federal Government workforce strategies to increase the clean energy workforce. Governments should consider more direct and targeted employer and employee incentives.

Consumer education and national harmonisation

RACV supports better regulation of lithium-ion batteries, which are becoming a growing cause of house fires in Victoria. Households should understand what to look for when purchasing items with lithium-ion batteries and how to use, charge and dispose of them safely.

Research indicates that one in five people are not aware of any risks of lithium-ion batteries². RACV recognises that there is a need to provide consumers with practical safety guidance for electric vehicles and micromobility device batteries.

11. The Victorian Government should work with the Federal and other State and Territory Governments to harmonise lithium-ion battery regulations, standards and labelling requirements for consumer products. This should also extend to e-mobility devices. The Federal Government should be responsible for developing and maintaining technical standards, placing import and/or sales restrictions on devices that don't meet the technical standards. The Victorian Government should be responsible for imposing operational restrictions on the use of e-mobility devices and enforcing misuse and unlawful modification of e-mobility devices. This should include strengthening labelling requirements on devices to address the increasing availability and use of off-brand chargers. This will require monitoring and enforcement to ensure compliance.
12. The Victorian Government should continue to fund education and awareness campaigns for consumers to improve energy literacy, including how to safely use and charge lithium-ion batteries and EVs and what to do should an incident occur.

² RACV Research 2024, n=1,000.