
From: Ian Cargill
Sent: Tuesday, 16 June 2020 12:50 PM
To: Adjudication
Subject: Representation re Solar Retailer Code

Dear ACCC

I have read a draft of a submission to ACCC by Ronald Brakels of SolarQuotes. Ronald says it better and more comprehensively than I could, But I agree completely with what he says and fully endorse it. I urge the ACCC to NOT reauthorise the CEC's Approved Retailer Scheme.

Based on Ronald's submission, I would re-iterate the CEC Approved Retailer Scheme has...

1. Not been voluntary in practice.
2. Reduced competition which has been against the public interest.
3. Has resulted in the CEC acting to the detriment of solar installation companies that are not Approved Solar Retailer members.

Not Voluntary: Various subsidy schemes — most notably the Victorian Solar Homes Scheme — have required participants to be CEC Approved Retailers to access the state solar rebate. If you are not a CEC Approved Retailer in Victoria, your solar systems will be about \$2,000 more expensive. Because of this, membership was clearly not voluntary but a prerequisite of remaining in the residential solar business in Victoria.

In SA you cannot access the SA Home Battery scheme rebate (about \$4000) unless you are an Approved Solar Retailer. If you want to be in the residential storage installation business in SA you are **forced** to be an Approved Solar Retailer.

Reduced Competition: Subsidy schemes that require CEC Approved Retailer membership reduce consumer choice and are **anti-competitive**.

Does Not Represent the Industry: The CEC claims to represent the rooftop solar installation industry but has taken actions to promote members of its Approved Retailer scheme to the detriment of installation companies that were not members. This has resulted in installers being driven out of the residential business in Victoria, not for the quality of their work but simply because they were not members of a group the CEC describes in its application or authorization as “voluntary”. There was obvious potential for **conflict of interest** in the organization in charge of setting standards and accreditation creating the Approved Retailer group and in practice, it has been glaring.

1. Wind down the CEC Approved Retailer scheme in a way that causes minimal disruption and inconvenience for existing members.
2. Completely separate the existing Approved Retailer scheme from the CEC.
3. Replace it with a robust, independent, inspection and mystery shopper scheme with publicly available results that provides consumers with clear information on the quality of installations.

Regards
Ian Cargill

