Australian Government
Clean Energy Regulator

Working as a verification service provider – expectations

Purpose

The purpose of this document is to set out the expectations of you as a verification service provider selected by the Clean Energy Regulator (CER) under the Solar Panel Validation (SPV) Initiative. This document aligns with requirements under your Verification Service Provider Deed (Deed) with the CER[1]. Your verification service issues verification responses to apps operating in SPV to enable the creation and delivery of signed data packages for successfully verified solar panel serial numbers. These signed data packages are used by Registered Persons and Registered Agents when creating small-scale technology certificates (STCs) under the Small-scale Renewable Energy Scheme (SRES).

Your participation in SPV, compliance with the Deed and these expectations is critical in helping to protect the integrity of the SRES and the Australian solar industry. In doing so, it provides industry and consumers with an easy way to check and confirm that solar panels are backed by manufacturer warranties, meet Australian standards for quality and performance, and are eligible for STCs.

Make your verification service compliant and available

All verification service providers issue a verification response to apps to enable the creation of signed data packages for use by installers and Agents during the creation of STCs. To achieve this, as a verification service provider you must:

1. Ensure your verification service complies with the requirements and obligations of the Deed and the SPV Message Interface Standard (MIS), all relevant legislation including under the *Renewable Energy (Electricity) Act 2000* (REE Act) and, relevant regulatory requirements, standards and guidelines. In particular, your verification service must:

    a. Offer all mandatory requirements and together with your database, ensure compliance through conducting regular conformance testing to confirm that its use does not compromise the integrity of the SPV.

    b. Receive data packages from installer Apps and verify data against information in your database and produce a Written Statement as part of the Verification Response to Apps operating in SPV.

    c. Be supported by a database of information related to relevant solar panel serial numbers that correspond to the Clean Energy Council (CEC) Approved PV Modules list. This information must be sourced from Approved Entities as defined under the Deed and satisfy the relevant Deed

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[1] In this document, capitalised words have the meanings given to those words in the Deed.

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requirements. This information must not be duplicated in databases belonging to other verification service providers.

2. Have a process or procedure in place to:

    a. Regularly check and monitor your Verification Service and information in your database to ensure compliance with the Deed and SPV MIS. Your database must contain accurate, complete and current information.

    b. Prevent a successfully verified response where the solar panel serial number has already been successfully verified.

    c. Monitor use of your verification service to identify and address improper use and/or non-compliance with the terms and conditions for the use of your verification service.

3. Report any non-compliance to the CER.

4. Be fair and reasonable with access to your verification service and database by providing app users and app providers with free access and use of the mandatory functions of your verification service.

5. Cooperate with any CER requests to undertake audits of your verification service and your database to ensure compliance with the Deed and SPV MIS and ensure currency and integrity of the data stored.

Best practice professional standards

Verification service providers are expected to apply best practice standards to protect themselves and their customers including by:

1. Treating everyone with respect and courtesy, this includes verification service providers, app providers, installers/app users, customers, and the CER. This means:

    a. Raising and seeking to resolve issues respectfully with the CER and others.

    b. Ensuring your own obligations in the Deed underpin negotiations with others.

2. Co-operating with the CER and others, complying with direction and making changes, reasonably requested by the CER, for the purposes of SPV.

3. Engaging with the CER about potential or confirmed changes to SPV that impact your verification service and database, including advising of any implications to your business or verification service.

4. Providing any documentation or information requested by the CER for:

    a. Confirming organisational details such as directors and personnel.

    b. Undertaking due diligence checks.

    c. Establishing your capacity to provide a verification service.

5. Having systems/processes in place to detect anomalies, manipulation, or erroneous data in your database. This includes the ability and actioning immediately, the removal and reporting to CER of any information from your database that does not comply with the requirements under the Deed or that would compromise the integrity of the data stored or the SPV.

Have good business practices

Verification service providers are expected to have good business practices to ensure success in delivering on obligations under the Deed by:

1. Identifying businesses to engage with and reviewing their different strengths and weaknesses, to determine alignment with your organisation's goals.

2. Engaging and negotiating with other businesses in good faith and discussing in more detail, any disagreement over matters, to better understand each other's point of view.

3. Having a legal agreement in place with the business that you engage with. This agreement should enable you to comply with your requirements under the Deed and contain clear and accurate details about what both parties have agreed and exactly what you expect from each other. These include:

    a. Legal agreements with Approved Entities to source solar panel information for your database.

    b. Legal agreements with app providers that request access to your verification service.

4. Having a compliance framework in place as required under the Deed which includes:

    a. Regular checks to ensure the integrity of your verification service, including your own regular conformance testing and reviews of your processes.

    b. Organisational due diligence as reflected in the Deed. If needed, the CER's due diligence checklist can be referred to.

    c. Having policies and procedures to manage how information is collected, used and disclosed. This includes recording the written consent of the person or business that owns and/or is providing the information and for what purpose the information is to be collected, used and disclosed.

    d. The management and protection of intellectual property, privacy and confidential information, including monitoring arrangements to identify unauthorised access, use and disclosure.

5. Having systems in place to notify the CER if you suspect that an Approved Entity, app provider or user is in breach of the REE Act or other legislation, including if you suspect solar panels do not meet Australian Standards or other requirements for listing on the CEC Approved Modules list.

Expectations and Deed references

Expectations	Relevant clauses in the Deed
Make your Verification Service compliant and available • Expectations 1-5	3.1.2(a), (e), (f), 3.3.1(a), (c) to (l),3.3.2, 3.3.7, 3.3.9, 3.4.1, 3.4.8, 3.5.1, 3.6.1 and 3.6.2, 3.7.1(b) and (c), 8.1.1(c)
Best practice professional standards • Expectations 6-10	3.2.1, 3.3, 3.4, 3.7, 3.8, 3.9, 4.1, 4.2, 6.1 to 6.4, 7.1.1 to 7.1.4, 10.1 and 10.2, 11.1 and 11.2
Have good business practices • Expectations 11-12, 15	3.1.2, 3.3.1, 3.3.9, 3.4.2 to 3.4.7, 3.7.1(a) and (d), 8.1.1
Have good business practices • Expectation 13 (legal agreements)	3.1.2(c) and (d), 3.3.1(b), 3.3.9(a) to (e), 3.4.2 to 3.4.7, 3.7.1, 8.1.1(a) and (b)
Have good business practices • Expectation 14 (compliance framework)	3.5.1(a)