



# Commercial and Industrial Solar Photovoltaic System (Part 47)

Frequently Asked Questions (FAQs) and example installation scenarios



We acknowledge and respect Victorian Traditional Owners as the original custodians of Victoria's land and waters, their unique ability to care for Country and deep spiritual connection to it.

We honour Elders past and present whose knowledge and wisdom has ensured the continuation of culture and traditional practices.

DEECA is committed to genuinely partnering with Victorian Traditional Owners and Victoria's Aboriginal community to progress their aspirations.

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# Background

The Victorian Energy Upgrades (VEU) program is the Victorian Government's flagship energy savings and emissions reduction program. The VEU program offers upfront discounts for households and businesses to upgrade to energy-efficient products and services, helping Victorians cut their energy bills, reduce their energy use and lower greenhouse gas (GHG) emissions.

On 29 September 2025, the VEU program introduced upfront discounts for commercial and industrial (C&I) premises to save energy and reduce emissions by installing solar photovoltaic (PV) systems of 30 to 200 kilowatts (kW) in size (under the Part 47 Activity – Commercial and industrial solar photovoltaic system).

The requirements for solar system installations to be eligible to create Victorian Energy Efficiency Certificates (VEECs) for this activity are included in the [Victorian Energy Efficiency Target Regulations 2018](#) and [Victorian Energy Upgrades Specifications 2018](#).

This document provides responses to frequently asked questions on the C&I solar activity.

For more information, please contact us via email on [energy.upgrades@deeca.vic.gov.au](mailto:energy.upgrades@deeca.vic.gov.au).

## List of acronyms

Table 1 - List of acronyms

Acronym	Text
AP	Accredited provider
C&I	Commercial and industrial
CER	Clean Energy Regulator
DNSP	Distribution Network Service Provider
ESC	Essential Services Commission
GHG	Greenhouse gas
kVA	Kilovolt-ampere
kW	Kilowatt
kWh	Kilowatt-hour
kWp	Kilowatt-peak
LGCs	Large-scale generation certificates

Acronym	Text
<b>M&amp;V</b>	Measurement and verification
<b>NETCC</b>	New Energy Tech Consumer Code
<b>NMI</b>	National Metering Identifier
<b>PBA</b>	Project-based Activities
<b>PV</b>	Photovoltaic
<b>SAP</b>	Scheduled Activity Premises
<b>SMM</b>	Specified Measurement Method
<b>SPVI</b>	Solar Panel Validation Initiative
<b>SRES</b>	Small-scale Renewable Energy Scheme
<b>STCs</b>	Small-scale technology certificates
<b>VEECs</b>	Victorian Energy Efficiency Certificates
<b>VEET Act</b>	Victorian Energy Efficiency Target Act 2007
<b>VEU</b>	Victorian Energy Upgrades

# Frequently asked questions

## Eligible sites

### Q - What types of premises/sites are eligible?

All new and existing non-residential premises (including for instance, businesses and factories as well as community buildings, schools and hospitals) are eligible to install a solar PV system and claim incentives, with a limit of one solar PV system per National Metering Identifier (NMI).

Non-residential sites which seek to install solar that is not affixed to a building, such as ground mounted systems and car park rooftops, are also eligible.

Apartments and residential buildings are **not eligible** for this activity.

Mixed use buildings<sup>1</sup> that include apartments are also **not eligible** for this activity. For example, a building that contains both apartments and retail or office spaces is not eligible.

### Q - How are residential premises defined?

Residential premises are defined in the Victorian Energy Efficiency Target Regulations 2018 as:

- a) a building classified as a Class 1 building under Part A6 of Volume One of the Australian Building Code (formally known as the National Construction Code) – residential homes.
- b) a sole-occupancy unit in a building classified as a Class 2 building under Part A6 of Volume One of the Building Code – domestic apartment buildings.
- c) a sole-occupancy unit in a building classified as a Class 3 building under Part A6 of Volume One of the Building Code – long-term or transient accommodation.

### Q - Are property renters (business) eligible under the C&I solar activity?

Yes. If a business rents the property it operates in, it can install solar provided it has reached an agreement with the site owner/landlord.

It is strongly advised renters check the terms of their lease agreement and engage with the landlord before undertaking any upgrades.

### Q - Are primary and secondary schools eligible?

Yes. Both primary and secondary schools are eligible for incentives under the C&I solar activity.

### Q - Are motels eligible?

Yes. Provided the system is installed on a common area of a motel, this is considered a non-residential site and would be eligible.

### Q - Are commercial farming/agriculture sites co-located with a home eligible?

A farming or agriculture site can access VEU incentives for installing a solar PV system provided the solar PV system is not being installed solely to serve a residential building and is serving an eligible non-residential part of the property. Installations must collect all supporting evidence to demonstrate compliance, outlined in the Essential Services Commission's (ESC) [Commercial and Industrial Solar Photovoltaic System Activity \(Activity 47\) Guide](#).

### Q - Are off-grid sites eligible?

Off-grid sites are not eligible for incentives under the C&I solar activity. The activity requires a negotiated connection contract to be undertaken with the relevant Distribution Network Service Provider (DNSP) and a NMI.

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<sup>1</sup> Mixed use buildings have mixed (or multiple) National Construction Code building classifications – more information on mixed use buildings can be found here: <https://ncc.abcb.gov.au/ncc-navigator/building-classifications>

### **Q - Are small medical centres considered a non-residential site?**

Yes. A small medical centre would be considered a non-residential site.

### **Q - Are scheduled activity premises (SAP) sites excluded unless they opt-in?**

All relevant VEU regulations and requirements need to be adhered to. This includes for SAP sites which are not eligible unless they opt-in to the VEU program.

## **Doorknocking and telemarketing**

### **Q - How does the VEU program regulate doorknocking and telemarketing, and does this differ from the federal government schemes?**

Under the VEU program, accredited providers (APs) are banned from using the following to market VEU program lead generation services:

- Telemarketing (since May 2024).
- Doorknocking (since 1 August 2024).

The Solar Homes program also requires solar retailers to adhere to the following requirements:

- A ban on door-to-door solar sales (since September 2021) and cold-call telemarketing sales techniques (since May 2024). This includes sales outsourced to contractors or marketing companies.

We expect that many solar retailers operating in Victoria, both through the Solar Homes program and VEU program, would already be familiar with these requirements. Businesses who become accredited to undertake the C&I solar activity will have to adhere to the VEU rules and regulations on telemarketing and doorknocking and meet their obligations under the VEU code of conduct.

These bans apply irrespective of whether the installation is eligible for federal incentives.

More information available here: <https://www.esc.vic.gov.au/victorian-energy-upgrades/participating-veu-program/meeting-your-obligations-under-veu-code-conduct>.

Installations for the C&I solar activity that are the result of telemarketing or doorknocking will be subject to the same enforcement and compliance penalties as any other VEU activity.

## **System compliance and requirements**

### **Q - How do you identify eligible panels under the Solar Panel Validation Initiative (SPVI)?**

For systems up to 100 kW, solar PV module manufacturers must be listed by the Clean Energy Regulator (CER) as a participating brand in the industry-led SPVI. Brands which participate in the SPVI are listed on the following webpage: <https://cer.gov.au/schemes/renewable-energy-target/small-scale-renewable-energy-scheme/small-scale-renewable-energy-systems/rooftop-solar/solar-panel-validation-initiative>.

### **Q - Can multiple retailers in embedded networks install systems for the C&I solar activity?**

The C&I solar activity is limited to one installation per NMI. If the gate meter (also known as a parent meter) NMI is listed/used in the negotiated connection contract with the relevant DNSP, this would limit the installation to one system for the embedded network. If a business customer is located on an embedded network, we would recommend discussing the installation with the operator of the embedded network, the installer and the relevant DNSP.

### **Q - What are the data requirements for inverters under the C&I solar activity?**

The system must include monitoring that provides the customer with information on system performance, energy production and system energy consumption, as per the requirements set out in the Specifications for Activity 47. Installers must collect evidence of the monitoring portal displaying real-time data, as per the ESC Activity Guide.

### **Q - Do projects under the C&I solar activity require pre-approval?**

No, VEU project pre-approval is not required.

## Greenhouse gas abatement calculations

### **Q - How many VEECs does the C&I solar activity create? What is the formula?**

The number of VEECs created will vary based on the total rated capacity of the system installed (in kW) and the location it is installed (metro/regional). The formula to calculate the number of VEECs can be found in the VEU Specifications here: <https://www.energy.vic.gov.au/victorian-energy-upgrades/installers/industry-specifications>.

The GHG savings for each scenario under the C&I solar activity is calculated using the following inputs:

- system size
- input factor
- lifetime
- regional factor.

This works out to approximately 1.3 VEECs per kW for systems 30 kW to 100 kW in size and 2.45 VEECs per kW for systems over 100 kW to 200 kW.

### **Q - How was the input factor decided, and why is it different between scenario 47A and 47B?**

The input factor was calculated based on the estimated on-site self-consumption of solar across a range of business types. The VEU program can only reward GHG emissions savings for activities that are additional (would not have occurred without the VEU program). For systems less than 100 kW (scenario 47A), upfront incentives for Small-scale technology certificates (STCs) reduce this additionality. The input factor and therefore incentives are lower.

### **Q - Is the system size defined by inverter size kilovolt-ampere (kVA), or PV array size in kilowatt-peak (kWp)?**

The system size is defined by the total rated capacity of the solar system (i.e. the sum of the power-generating capacity of all solar panels, measured in kW).

### **Q - Is the VEEC calculation methodology for the C&I solar activity the same as the current Project-based Activities (PBA) methodology?**

The methodology for calculating VEECs is based on the estimated on-site self-consumption of solar. The activity is a 'deemed' activity – rather than measurement and verification (M&V). GHG savings are calculated upfront based on the Government's modelling which takes a conservative view.

### **Q - Why does the C&I solar activity not incentivise systems above 200 kW?**

Deemed activities use best-practice data and estimates to determine GHG savings. For systems above 200 kW, there is considerable variability in both solar output and on-site consumption. The use of the VEU M&V method is recommended for systems above 200 kW to ensure the accuracy of GHG abatement.

## Installing at sites with an existing solar system

### **Q - Are discounts rewarded for new solar PV systems, or does the C&I solar activity include additional solar PV systems?**

New and additional systems are eligible for VEU incentives, noting there can only be one C&I solar activity per NMI and only within the eligibility criteria for system sizes. The DNSP negotiated connection contract / evidence provided to the ESC must also clearly state the additional capacity being installed.

### **Q - Can a business that already has a 100 kW system add another 100 kW system under this activity?**

If a business has installed the initial 100 kW outside of the VEU program, it can claim VEU incentives for the additional 100 kW capacity. If the system is equal to or below 100 kW, this would be claimed under scenario 47A. Incentives cannot be claimed for the existing system.

### **Q - If a site already has 200 kW and adds another 200 kW, is the incremental capacity eligible, or is there a 200 kW cap per NMI total?**

The 200 kW can be installed as additional/incremental capacity.

## Installing solar systems in stages

### **Q - Is this rebate available per NMI or per property?**

Incentives for the C&I solar activity are available once per NMI.

When creating VEECs under the C&I solar activity the system being installed must be equal to or below 200 kW as listed on the negotiated connection contract with the relevant DNSP.

Systems above 200 kW are eligible to create VEECs through the M&V method.

### **Q - Can you claim the first 200 kW of a 300 kW system under the C&I solar activity?**

When creating VEECs under the C&I solar activity the system being installed must be equal to or below 200 kW as listed on the negotiated connection contract with the relevant DNSP.

It is possible for sites to install a 200 kW system under the C&I solar activity and then install additional capacity under the VEU M&V method at a later date. The energy savings from the system that has been installed under the C&I solar activity must be deducted from the M&V savings. This approach cannot use the counted savings mechanism in PBA to deduct the already awarded VEECs. The energy savings of the existing system need to be entirely removed.

### **Q - How many times can you claim VEECs under the C&I solar activity? Can two separate new systems installed at a given NMI both be eligible?**

Solar systems can be installed in phases but can only claim C&I solar activity incentives once per NMI for up to a maximum of 200 kW. For example, if two 100 kW systems are installed in phases on the same NMI, the 'system' is defined as a 200 kW installation when creating VEECs. The limit of one system per NMI applies and both systems must have been energised, be compliant with the DNSP negotiated connection contract and meet all VEU requirements to create VEECs. The systems cannot be submitted separately for VEEC creation and must be submitted at the same time.

### **Q - If you claim VEECs for a 30 kW system under the C&I solar activity, then decide to install another 170 kW (under the same NMI), can you claim the 170 kW system under the C&I solar activity?**

No. Once a business has claimed VEECs for the 30 kW system, it will not be eligible. Only one system can be installed and claim VEECs per NMI.

### **Q - If a 300 kW system is being installed, can you claim VEECs, STCs and LGCs on the initial 200 kW if staged and/or separately metered?**

The C&I solar activity provides incentives for systems between 30 to 200 kW. Systems above 200 kW may use the VEU M&V method (if the system size stated on the negotiated connection contract is above 200 kW).

If the installation is staged, a business may be able to claim deemed VEECs the first 200 kW under the C&I solar activity and the additional 100kW under the M&V method. The contributions of the 200 kW system installed under the C&I solar activity will need to be removed entirely as part of the M&V project.

## Interaction with Project-based Activities

### **Q - Is the C&I solar activity a sub method of PBA?**

No. This is a new activity that will provide upfront incentives for the installation of 30 to 200 kW solar systems.

A Specified Measurement Method (SMM) was released under PBA in August 2025 that streamlines the M&V method for solar upgrades.

Systems that are 30 to 200 kW in size can either undertake the C&I solar activity or M&V, but not both methods. Systems above 200 kW are eligible to claim incentives under M&V.

### **Q - How does the C&I solar activity interact with the existing M&V process? Can larger 200 kW+ systems receive rebates under both methods?**

For solar installations to be eligible for VEECs under the C&I solar activity, the total rated capacity of the solar system being installed (in kW) must be stated on the negotiated connection contract and be equal to or below 200 kW. Systems up to 200 kW can receive VEU incentives under the C&I solar activity or M&V but cannot undertake both methods.

It is possible for sites to install a 200 kW system under the C&I solar activity and install additional capacity later under the M&V method. The energy savings from the system that has been installed under the C&I solar activity must be deducted from the M&V savings. This approach cannot use the counted savings mechanism in PBA to deduct the already awarded VEECs. The energy savings of the existing system need to be entirely removed.

### **Q - If a site is installing a solar PV system and a battery, can you claim VEECs for the solar PV system under the C&I solar activity, and claim VEECs for the battery under M&V?**

Yes, the first 200 kW of the solar PV system can claim incentives under the C&I solar activity.

The battery installation can claim further VEECs under PBA. However, as this project would be defined as a battery upgrade in PBA (i.e. not be eligible for the Solar PV SMM). This would increase complexity for the PBA project which will now need to establish a baseline and require more time.

If the battery and solar were both registered as a single PBA project, the Solar PV SMM approach would be suitable.

### **Q - Does the C&I solar activity have the same definition of Energy Consumer under Solar PV SMM method?**

Yes, the definition of energy consumer is the same under the SMM. The 'energy consumer' for an upgrade is defined under the *Victorian Energy Efficiency Target Act 2007* (VEET Act) and includes the consumer of electricity or gas at the premises as well as site owners or landlords.

## Claiming LGCs and STCs

### **Q - Can you access rebates through the federal LGC and STC schemes, together with the VEU discount?**

Yes, in addition to incentives under this VEU activity, consumers are also eligible to claim incentives under the Renewable Energy Target.

- Systems 30 to 100 kW may be eligible to claim STCs under the Small-scale Renewable Energy Scheme.
- Systems of more than 100 kW and up to 200 kW may be eligible to claim large-scale generation certificates.

If claiming VEECs and either LGCs and/or STCs, then the requirements of the VEU program will be required to be met.

### **Q - A 200 kW system has been sold to a customer. System A is 100 kW and collects STCs. System B is 100 kW and collects LGCs. Despite being sold as a single system, they are separately installed systems. Do you need to submit them as separate systems?**

Solar systems can be installed in phases to claim STCs and LGCs but can only claim C&I solar activity incentives once per NMI for up to a maximum of 200 kW. For example, if two 100 kW systems are installed in phases on the same NMI, the 'system' is defined as a 200 kW installation when creating VEECs. The limit of one system per NMI applies and both systems must have been energised, be compliant with the DNSP negotiated connection contract and meet all VEU requirements to create VEECs. The systems cannot be submitted separately for VEEC creation and must be submitted at the same time.

### **Q - Why can you claim both STCs and VEECs for the C&I solar activity (Part 47), but cannot claim both STCs and VEECs for the Commercial heat pumps activity (Part 44)?**

Under the Small-scale Renewable Energy Scheme (SRES) only hot water systems with an insulated storage volume less than 425 litres are eligible to create STCs. Under the Commercial and Industrial Heat Pump Water Heater activity (Activity 44) only hot water systems with an insulated storage volume above 425 litres are currently eligible.

Rather than excluding double dipping entirely, the C&I solar activity accounts for additionality by reducing VEEC incentives for systems less than 100 kW.

## Becoming an accredited provider

### **Q - When will the C&I solar activity be available for businesses and APs to apply and how long will it take to get approved?**

The ESC anticipates businesses will be able to apply to be accredited to undertake the C&I solar activity from 31 October 2025 when the accreditation application forms are released.

C&I solar activity applications are subject to external compliance checks, particularly for new applicants. Timing will also depend on the volumes of applications received. At this stage, the ESC expects new applications to likely take up to five weeks. Applications to vary conditions and approve the accreditation of an existing AP to undertake the C&I solar activity will likely take between two to four weeks.

### **Q - What does the accreditation process look like?**

APs for the VEU program are regulated by the ESC. To find out more about how to become accredited, please see the ESC website: <https://www.esc.vic.gov.au/victorian-energy-upgrades-program/participating-veu-program/how-become-veu-accredited-person>.

### **Q - Do you have to be New Energy Tech Consumer Code (NETCC) signatory to participate?**

APs do not have to be a signatory to the NETCC to participate. However, the ESC may consider this in assessing whether a business is competent and capable to be accredited for the C&I solar activity.

### **Q - Why is the accreditation process currently only open for APs who participate in C&I solar system upgrades under the PBA (M&V) method?**

The aim of the streamlined pathway is to enable the ESC to approve applicants quickly and therefore provide consumers with ability to access incentives as soon as possible. A quick approval process necessitates approving APs with demonstrated experience undertaking C&I solar via the VEU M&V method.

The streamlined pathway is only a temporary accreditation pathway. Other APs are able to apply from 31 October 2025. Further information on becoming an AP for this activity is available here: <https://www.esc.vic.gov.au/victorian-energy-upgrades-program/participating-veu-program/how-become-veu-accredited-person>.

### **Q - When can APs start talking about this with their prospective customers?**

Information on the activity and requirements is now available. APs are encouraged to familiarise themselves with the activity requirements as set out in the [Victorian Energy Efficiency Target Regulations 2018](#) and the [Victorian Energy Upgrades Specifications](#), prior to engaging with energy consumers. The ESC Activity Guide sets out the requirements and obligations for APs when undertaking this activity. Information is available here: <https://www.esc.vic.gov.au/victorian-energy-upgrades/activities-offered-under-veu-program/commercial-and-industrial-solar-photovoltaic-system-activity>

### **Q - Where can APs find further information about the accreditation requirements for the VEU C&I solar activity, and how these might differ from the federal government schemes?**

For more information about accreditation requirements, please visit: <https://www.esc.vic.gov.au/victorian-energy-upgrades-program/participating-veu-program/how-become-veu-accredited-person>. If you have further questions for the ESC about accreditation or the administration of the C&I solar activity, please send an email to: [veu@esc.vic.gov.au](mailto:veu@esc.vic.gov.au).

## Activity implementation

### **Q - When will solar PV system installations be eligible for rebates under the new C&I solar activity?**

To create VEECs for the C&I solar activity, solar PV systems are eligible to be installed from the date the AP is approved to undertake the VEU Part 47 activity.

### **Q - Why are solar PV system installations only eligible under the C&I solar activity once the AP is approved for accreditation (rather than once the AP applies for accreditation)?**

There have been several amendments to the VEET Act over the life of the VEU program, where different VEU program rules were in place previously. Under the current VEET Act, section 15A prohibits the undertaking of a prescribed activity without the relevant accreditation, and section 20A makes it an offence to create a certificate in breach of a condition.

### **Q - When will the ESC VEU Registry be able to process VEEC creation applications for the new C&I solar activity?**

The ESC anticipates the changes to the VEU Registry to facilitate VEEC creations for the C&I solar activity will occur in November 2025.

### **Q - When can customers expect to receive incentives from their solar PV system installation from the C&I solar activity?**

APs will be able to trade VEECs once they are registered. Currently, the ESC VEEC registration process has a general target timeframe of 21 calendar days but may take longer if any eligibility issues are identified through the assessment process. Given the C&I solar activity is a new and complex activity, the ESC is developing the scope of assessments for the C&I solar activity based on activity's risk profile. The ESC expect that registration assessment timeframes are likely to be longer, particularly in respect of each AP's first VEEC creation claims for this activity.

### **Q - Has the ESC engaged with software platform providers in advance to support the development of the C&I solar activity VEU Registry?**

Yes. The ESC Salesforce development team are currently implementing changes to support the C&I solar activity for deployment into the production environment in November 2025.

## Consultation on the C&I solar activity

### **Q - Why have you not publicly consulted? Is this something that industry should expect moving forward for future activities?**

Public consultation for VEU C&I solar activity was not held to prevent industry disruption and avoid the risk of businesses delaying decisions to install solar PV until new incentives were available.

Solar Victoria and the ESC welcome feedback from industry on the C&I solar activity. The activity will be evaluated in 2026 to ensure that it is meeting the intended outcomes.

### **Q - Was this activity part of the VEU industry work program roadmap?**

Yes, the activity was listed as 'Business Electrification'. The C&I solar activity was not specifically referenced on the workplan to prevent industry disruption and potentially stopping businesses from installing solar PV until new incentives were available. The department will take on feedback from industry and the activity will be evaluated in 2026 to ensure that it is meeting the intended outcomes.

# Appendix - Example installation scenarios and eligibility

## Scenario 1 – Solar systems above 200 kW

**Description:** A customer wants to install a system greater than 200 kW and claim VEECs for 200 kW of the system using the C&I solar deemed activity.

The customer is **not eligible** to claim VEECs for 200 kW of the system, as the capacity stated on the DNSP negotiated connection contract is above 200 kW.

It is recommended the site undertakes the VEU M&V method for solar systems above 200 kW.

## Scenario 2 – Undertaking the C&I solar activity (Part 47) and M&V for the same 30 to 200 kW system

**Description:** A customer wants to claim upfront VEECs under the C&I solar deemed activity by installing a 200 kW solar system, and 'top-up' incentives by undertaking an M&V activity for the same system.

The customer is **not eligible** to claim VEECs under both the C&I solar activity and M&V method. Systems that are 30 to 200 kW can be installed under either the C&I solar activity or the M&V method. The same system cannot undertake both methods.

## Scenario 3 – Installing an initial 200 kW system and undertaking M&V for future installations

**Description:** A customer wants to install a solar system greater than 200 kW in two stages. For example, claim 1 x 200 kW system first under the C&I solar activity and claim the additional system capacity (for instance 500 kW) under the M&V method.

The customer **is eligible** provided the negotiation connection contract for the C&I solar activity does not exceed 200 kW. Systems can undertake the M&V method for additional capacity. Note – the entire energy savings from the 200 kW must be excluded as part of the M&V project.

## Scenario 4 – Installing a 30 to 200kW system in stages

**Description:** A customer wants to install a 200 kW solar system in two stages. For example, claiming 1 x 100 kW system for STCs and 1 x 100 kW system for LGCs.

The customer **is eligible**. Solar systems can be installed in phases to claim STCs and LGCs but can only claim C&I solar activity incentives once per NMI for up to a maximum of 200 kW. For example, if two 100 kW systems are installed in phases on the same NMI, the 'system' is defined as a 200 kW installation when creating VEECs. The limit of one system per NMI applies and both systems must have been energised, be compliant with the DNSP negotiated connection contract and meet all VEU requirements to create VEECs. The systems cannot be submitted separately for VEEC creation and must be submitted at the same time

## Scenario 5a – Installing additional capacity (extensions)

**Description:** A customer with an existing 100 kW system wants to install an additional 200 kW system.

The customer **is eligible** provided the negotiated connection contract for the additional capacity being claimed under the C&I solar activity is up to 200 kW. The DNSP negotiated connection contract / evidence provided to the ESC must also clearly state the additional capacity being installed.

## Scenario 5b – Installing additional capacity (extensions)

**Description:** A customer with an existing 15 kW system wants to install an additional 20 kW system.

The customer is **not eligible** as the additional capacity being claimed is under 30 kW.

