Attachment 1 Stakeholder feedback template

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in this paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

Organisation:

Contact name:

Contact details (email / phone):

| Questions | Feedback |
| --- | --- |
| **Chapter 4 – Assessment framework** |
|  | Is the assessment framework appropriate for considering the proposed rule changes? |  |
|  | Are there other relevant considerations that should be included in the assessing the proposed rule changes? |  |
| **Chapter 5 – Section 5.1.1 – Benefits of a register** |
|  | What are the likely uses of a distributed energy resources register? |  |
|  | How, and to what extent, could the static information provided by a DER register meet the objectives outlined by the COAG Energy Council, namely: |  |
|  | 1. more accurate load forecasting?
 |  |
|  | 1. improving AEMO's ability to manage power system security during credible contingency, protected and non-credible contingency events?
 |  |
|  | 1. improving AEMO's ability to set the bounds of the technical envelope at an efficient level?
 |  |
|  | 1. improving efficient market and network investment?
 |  |
|  | Are there any other ways that a distributed energy resources register could benefit the National Electricity Market? |  |
|  | What features does a register need to have in order to meet the objectives outlined by the COAG Energy Council? |  |
| **Chapter 5 – Section 5.1.2 – Expected costs** |
|  | What costs do you believe would likely be involved in the collection of useful data about DER? |  |
|  | Do you agree with the costs identified by Jacobs for different stakeholders? If not, why? |  |
|  | Are stakeholders able to provide data or case studies that would support further quantification (in monetary terms) of any of costs likely to manifest? |  |
|  | How might the nature and magnitude of these potential costs change over time? |  |
| **Chapter 5 – Section 5.2 – Governance** |
|  | Please comment on the suitability of the following: |  |
|  | 1. Should 'small scale' systems be limited to generation systems below 5 MW? Should any further limitations be imposed (e.g. a minimum capacity or a threshold in MWh for energy storage)?
 |  |
|  | 1. Is the NER definition of 'connection point' an appropriate spatial demarcation for 'behind the meter' DER? If not, what is an appropriate spatial demarcation for 'behind the meter' DER?
 |  |
|  | 1. Is a 'distributed energy resource' "*an integrated system of energy equipment co-located with consumer load*"? If not, what else could it be characterised as?
 |  |
|  | Regarding the management of a DER register: |  |
|  | 1. To what extent should the types and capacity of DER eligible for inclusion in the register be defined in the NER or in an AEMO guideline?
 |  |
|  | 1. Should the nature of the information being collected and recorded in the register and any other requirements, such as how often parties need to report the data, be determined in an AEMO guideline?
 |  |
|  | 1. What types of principles, factors or other criteria should AEMO be required to consider when developing guidelines on the collection and recording of information on DER?
 |  |
| Chapter 5 – Section 5.3 – Data collection and compliance |
|  | How often does the data need to be collected and updated to achieve the objectives of a DER register? |  |
|  | Do you agree that there is a need for consistency across network regions in what data should be collected? |  |
|  | If DNSPs' connection application processes are considered a good method of collecting data, what changes are needed to existing processes? |  |
|  | Should obligations on parties other than DNSPs be considered to support data collection? If yes, which parties are best placed to collect and report this data? |  |
|  | How would an obligation on the parties identified above best be applied and enforced? Please provide details. |  |
|  | Will a register be beneficial if the levels of compliance in relation to providing information are similar to the low levels of compliance with the DNSP connection application processes? What levels of compliance are needed? |  |
|  | How else can compliance levels be improved? |  |
|  | How can compliance best be maintained over time as technology changes? |  |
| Chapter 5 – Section 5.4 – Transparency and confidentiality |
|  | Given the nature of information that may be required to be provided by registered participants under the proposed rule change, are existing regulatory arrangements (such as the protected information provisions under the NEL and Privacy Act 1988) regarding the collection and disclosure of information adequate to protect market participants and consumers whose DER systems are included in the register? |   |
|  | If not: |  |
|  | 1. What are the likely nature, and magnitude, of potential consequences of insufficient protection of such information?
 |  |
|  | 1. Should the NER limit, on the basis of confidentiality concerns, the information that registered participants or others would be required to provide to AEMO under the DER Register Guidelines? If yes, how?
 |  |
|  | 1. Should the NER limit, on the basis of confidentiality concerns, how AEMO may use or disclose information provided to it under the DER Register Guidelines? If yes, how?
 |  |
|  | Are there any competition concerns raised by the establishment of the register? |  |
| Chapter 5 – Section 5.5 – Safety issues and emergency response |
|  | Would the sharing of data collected under a DER register be useful to emergency services, and if so, how? |  |
|  | Are there existing mechanisms currently in place (e.g. requisite IT systems) that could facilitate the practical sharing of data with emergency responders on a real time basis? |  |
|  | Is the proposed DER register the most practical mechanism to provide emergency services with the required information? |  |
|  | What important features does a register need to have in order to meet the needs of emergency services? |  |
|  | To what extent is energy related information already shared between relevant bodies (e.g. AEMO/CER) to emergency services for safety reasons? |  |
| Other comments on the rule change request or consultation paper |
|  | Do you have any other comments on the rule change request or the consultation paper? |  |