



11 April 2018

Daniela Moraes
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Australian Energy Market Commission
PO Box A2449
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Dear Daniela

Re: REGISTER OF DISTRIBUTED ENERGY RESOURCES CONSULTATION PAPER

CitiPower, Powercor and United Energy welcome the opportunity to respond to Australian Energy Market Commission's (AEMC) consultation report on the register of distributed energy resources (DER).

We support the proposal to develop a register for DER. The DER will bring significant network management and safety benefits to distributors and the wider National Electricity Market (NEM). We also support Jacob's cost-benefit analysis of developing and maintaining the register and the proposal for the Australian Energy Market Operator (AEMO) to be the party responsible for the register.

Our submission highlights further considerations for the development of the register to ensure its effectiveness.

1.1 The obligation to provide information should be on DER owners and installers

The success and relevance of the register will depend on the responsiveness of DER owners. We agree distributors should be required to collect the DER information and provide it to AEMO, however the obligation to provide information should be on the DER owner. In most cases, the distributor will not be aware of installed or augmented DER unless informed by the customer which would make the cost of seeking out that information excessive. As such, we propose that customers be obliged to inform of new and augmented installations, with practical financial penalties in the case of non-compliance.

We believe that DER installers have a strong role in the register by ensuring that the DER owner is aware of their obligation to inform the distributor of the new or changed installation. The obligation should be clear in the paperwork related to the installation.

1.2 Information should be collected from relevant NMIs

We believe that the most practical spatial demarcation is the National Meter Identifier (NMI) to which the DER is connected. This effectively means any DER behind the property's meter. We do not consider that any connection point prior to the meter on the distribution network is appropriate, as those connection points can have more than one NMI attached to it.

It is important to note that this should apply to embedded networks as well. Each embedded network will have one NMI, for which DER information should be provided in an aggregated form. In the case of embedded networks, the obligation to provide aggregate DER information to the distributor should be on the Embedded Network Manager or the Embedded Network Operator.

1.3 Information should be collected for all DER

We propose that all export capable devices connected to a NMI, regardless of storage or export capacity, be required to register in the DER register. All generators with a capacity of more than 5 megawatt (MW) should follow present registration guidelines and register with the network regardless of whether registration with AEMO is required.

While we do not propose a definition of DER, we see benefit in collecting information on at least solar photovoltaic (PV) and battery storage. It is necessary for us to understand the import and export capacity of these technologies to more accurately manage the network. The final definition of DER should allow for more new technologies to be captured as they emerge. The definition of the information to be collected should be agreed by AEMO and distributors.

1.4 Information should be easily accessible to distributors for network management

We support distributors collecting the DER capacity information and providing it to AEMO. We however propose distributors be able to have access to collected information from AEMO in a format most practical for network management (such as consolidated spreadsheets).

We envisage that the highest benefit of the DER register is the potential participation of DER owners in demand management. As such, we propose distributors be able to use information in the register to contact consumers for potential demand management solutions. DER owners should give consent to be contacted for such purposes at the time of registering their DER or when updating their information.

1.5 The register should be updated on a continuous basis

The register should be a 'live' database updated continuously and preferably hosted on an online tool administered by AEMO. This would ensure that the information in the register is up-to-date and relevant in real time, rather than updated periodically. The responsibility for updating the register with real time information should be with AEMO and distributors, while the onus of providing DER information should remain with DER owners.

Should you have any queries about our submission please do not hesitate to contact Sonja Lekovic on (03) 9683 4784 or slekovic@powercor.com.au.

Yours sincerely,



Brent Cleeve
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