

24 April 2018

Ms Daniela Moraes
Adviser & Project lead: DER Registry Rule
Australian Energy Market Commission
201 Elizabeth St
Sydney NSW 2000

By email: daniela.moraes@aemc.gov.au

Dear Ms Moraes,

RE: Consultation paper – National Electricity Amendment (Register of distributed energy resources) Rule 2018

GreenSync is pleased to provide comments on the DER Registry Rule consultation paper.

GreenSync is an Australian energy technology company that is pushing the boundaries towards more flexible and decentralised grids – keeping grids stable and efficient whilst absorbing more renewable energy.

The electricity system in Australia is shifting from one that delivers electricity long distances from a few large centralised generators, to one where millions of small, local generation sources supply customers directly and provide localised energy services.

We appreciate that the AEMC's consultation and proposed rule change responds to emerging gaps in information requirements, data collection and DNSP approaches to connection of – and communication with – distributed energy resources (DER).

While data is becoming increasingly rich, and valuable, in all corners of our lives, it is important to note that in relation to data from DER:

- data belongs to the asset(s) owner and must be carefully protected
- asset owners have little faith in sharing their data unless its value is clearly communicated to them and they are fairly remunerated.
- dynamic asset data is infinitely more useful than a static, historic register of what was once deployed.
- data is not particularly valuable being collected if it is not able to be shared, therefore:



- data sharing should be encouraged with direct and proportional incentives to the asset(s) owner
- incentives for making data available, and enabling assets to participate in markets, can provide much richer and dynamic data to support market evolution.

GreenSync's decentralised energy exchange (deX) will enable "smart" DER owners to gain incentives for making their asset(s)' services available to other parties via deX. Ensuring that data capture is digital, dynamic and as simple (and transparent) as possible – for the installer and the asset owner – is vital to the capabilities that will be possible through the deX marketplace.

Given our existing collaborations on deX, and a strong interest from our tech development perspective, we are keen to understand what new requirements will come from any centralised DER registry so that we can both accommodate and build to these, or potentially provide this service.

Regardless of how this requirement is enabled (via a new Rule as is being proposed here, or another mechanism), we are committed to ensuring that deX will meet and exceed the needs of the DER registry and other market information expectations. For example, deX can provide a key avenue for data capture and consumer incentives to be structured at the point of purchase, connection & installation and operation. deX ensures data access will meet the needs of tech providers, retailers, networks, AEMO, regulators, consumer protection agencies and emergency services.

Fundamentally, GreenSync considers that data resources should be digital and dynamic. Digitisation, done well, should enable a vast improvement on current (inefficient, inconsistent, incomparable) and proposed data and information management systems.

We agree that data collection should be streamlined (as far as possible) and that existing inefficiencies and overlaps should be eliminated. We believe that the registry should not restrict types of DER and should be expandable to manage consumer investment choices over time (which may change).

Further, it is our view that DNSPs, through the network connection process, are best placed to facilitate data collection. We would recommend that the Commission focus on a 'sticks *and* carrots approach' through the use of incentives as well as compliance and enforcement mechanisms. The value streams emanating from markets (like deX) are ideal 'carrots' for both new DER deployment and historic updates.

We welcome the step towards improving data systems across the energy market and through energy institutions, but we note that there are a number of processes underway that should, in an ideal world, provide input and direction to further work on the registry – including:



- The Energy Security Board's NEM data strategy
- The Energy Networks Australia National Connection Guidelines principles and technical guidance
- The Consumer Data Right and its application to the energy sector, and specifically the consumer electricity data access scheme
- Energy Consumers Australia – behind the meter code of conduct
- Updates to AS 5139 for battery installation

Relatedly, it would be worth considering the DER data capture opportunities (and tools that may be needed) that could augment accredited training, assessment, certification, quality assurance and any compliance frameworks managed by existing training providers (eg. CEC, NECA etc) or regulatory agencies.

To proceed further, it would be helpful to see a map of the AEMC's understanding of who needs access to what, when and why? This could be represented by mapping out the desired DER data capture ecosystem. We recommend that the AEMC seek stakeholder feedback on gaps, opportunities and supporting tools that could be used to improve and streamline this desired approach.

Involving companies in the energy technology, telemetry and communications industries in focused design thinking is crucial to the creation of secure, transparent, efficient and optimised DER registries (or, better; marketplaces). Wider collaboration is also crucial to ensure that consumers' interests and protections are linked, and incentive arrangements link data capture from installation through to system operation.

GreenSync would be very pleased to expand on the comments outlined above and welcomes questions about deX and the potential role it can play in enabling incentives and data capture. We look forward to further engagement regarding this process.

Yours sincerely,



Doug Cook
A/g Chief Strategy and New Business Officer



