

17/04/2018

Mr John Pierce  
Chair  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Dear Mr Pierce

### **Consultation Paper – Register of Distributed Energy Resources rule change request**

TransGrid welcomes the opportunity to provide comments on the AEMC Consultation Paper on the Rule change request to establish a register of distributed energy resources.

TransGrid is the operator and manager of the high voltage transmission network connecting electricity generators, distributors and major end users in New South Wales and the Australian Capital Territory. TransGrid's network is also interconnected to Queensland and Victoria, and is instrumental to an electricity system that allows for interstate energy trading.

The National Electricity Market (NEM) is in the midst of a transformation, with the transition towards renewable energy and an increasing penetration of distributed energy resources (DER). The proposed Rule change to establish a register of DER aims to improve power system and network security and operation through the provision of better information on behind the meter DER.

TransGrid supports the overall intent of the proposed Rule. However, we submit that the proposed rule would have significantly greater benefits if it was amended to allow transmission network service providers (TNSPs) to have access to the information in the DER register.

Allowing TNSPs to have access to the information in the register has the potential to offer benefits to the planning and operation of transmission networks on a number of fronts including:

- > allowing improved forecasting of long-term demand, which would inform the planning of transmission network investment.
- > allowing improved forecasting of short-term energy flows over the transmission network, which would inform TNSPs of all available opportunities in operating the transmission network and assist in ensuring system stability.
- > indicating those areas of the transmission network where there are significant potential sources of demand management. This would assist TNSPs in identifying opportunities of non-network options to defer or avoid transmission network investment.

Allowing TNSPs to have access to the register of DER will facilitate more prudent and efficient planning and operation of transmission networks, resulting in lower prices for all consumers. If you would like to discuss this submission, please contact Neil Howes, Acting Manager, Regulatory Policy, on 02 9284 3748.

Yours faithfully



Caroline Taylor  
**Acting Executive Manager, Regulation**