

7 August 2018

Richard Owens  
Executive General Manager, Transmission and Distribution Networks  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Locked Bag 14051  
Melbourne City Mail Centre  
Victoria 8001 Australia  
T: 1300 360 795  
[www.ausnetservices.com.au](http://www.ausnetservices.com.au)

Reference code: ERC0227

Dear Richard

### **Draft Rule Determination: Register of Distributed Energy Resources**

AusNet Services appreciates the opportunity to respond to the AEMC's draft rule determination on establishing the register of distributed energy resources (DER).

COAG Energy Council's rule change seeks to improve the collection and sharing of information about small-scale DER. The draft determination and draft rule establishes a framework that is effective in appropriately sharing this information.

We broadly support establishing an efficient mechanism for collecting and sharing DER related technical information. Sharing DER information with Australian Energy Market Operator (AEMO) has the potential improve electricity forecasting and could benefit all customers through better system management.

### **Obligations should only extend to providing data provided by customers**

AusNet Services is concerned the draft rule applies obligations on Distribution Network Service Providers (DNSPs) to provide information that we are entitled to collect under new chapters 5 and 5A rule obligations. However, this would require that customers are compliant in their provision of information to the DNSPs, and that the information provided by customers in the past is in accordance with what DNSPs are entitled to now collect under new chapters 5 and 5A rule obligations.

The draft rule does not include practical mechanisms to participate in enforcement of customers' obligations to seek connection agreements for new or altered DER assets at their premises. Without this enforcement mechanism, the cost of seeking this information on an ongoing basis would be excessive.

Therefore, we consider DNSPs should only be obligated to provide AEMO with data actually collected from customers, and recommend the following amendment to the draft rule.

3.7E (d) Network Service Providers must provide to AEMO in accordance with the DER register information guidelines, DER generation information in relation to connection points on their network which they ~~are entitled to~~ collect under the Rules, including but not limited to DER generation information they ~~are entitled to~~ collect under clauses 5.3.3(c)(4a), 5A.B.2, or 5A.C.3.

### **Timeframe for providing DER register information is too short**

The draft rule does not define what information must be provided, rather it places an obligation on AEMO to develop, maintain and publish DER register information guidelines by 1 June 2019. It is proposed that DNSPs are required to provide this information within 3 months of this date, and to provide new or updated information collected from this date.

Without a description of what constitutes DER register information until 1 June 2019, DNSPs would not be able to commence work on making changes to IT systems required to capture and provide new or updated DER register information to AEMO. Even if DNSP systems are already storing DER information, alterations may still be required to provide currently unforeseen information to AEMO by 1 September 2019.

AusNet Services is concerned this timeframe of only 3 months is not adequate to make the system alterations that must incorporate multiple phases testing. Commencing development on the basis of the draft guidelines, instead of the final guidelines, adds risk and costs to the project, but still does not provide adequate time to make the system changes.

Accordingly, we recommend DNSPs are afforded an extra 6 months to comply with requirements to provide collected DER register information.

If you have any queries about any of the positions outlined in this submission, please do not hesitate to contact Justin Betlehem on 03 9695 6288.

Yours sincerely,

A handwritten signature in blue ink that reads "Kelvin Gebert". The signature is written in a cursive, slightly slanted style.

Kelvin Gebert  
**Manager Regulatory Frameworks**