



7 August 2018

Daniela Moraes
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Daniela

Re: REGISTER OF DISTRIBUTED ENERGY RESOURCES DRAFT DECISION - ERC0227

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

We broadly support the draft decision and believe the registers will bring significant network management and safety benefits to distributors and the wider National Electricity Market (NEM). In this letter we propose one change to the draft rule to ensure distributors are not required to manage the risk of customers' non-compliance.

Distributors should only be obligated to provide AEMO with data collected from customers

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 through their connection process and deemed standard connection contract. However, distributors should only be obligated to provide the Australian Energy Market Operator (AEMO) with data actually collected from customers, as the cost of seeking out information distributors *are entitled to collect* under the National Electricity Rules would be excessive. As such, we propose the wording in the draft rule for clause 3.7E(d) is amended to the following:

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.

Similarly, customers should be accountable for the quality and completeness of data provided to distributors and ultimately to AEMO. The cost of distributors checking the quality of data collected and/or identifying differences between collected data and that obtained from other sources is also likely to be excessive and outweigh the overall benefit of the register.

We look forward to consulting with AEMO on the DER register information guideline.

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

Yours sincerely,

Brent Cleeve
Head of Regulation, CitiPower, Powercor and United Energy