



Ref: B936320

8 August 2018

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

www.aemc.gov.au/contact-us/lodge-submission

ERC0227 –Submission on the draft rule for the Register of Distributed Energy Resources

Essential Energy welcomes the opportunity to comment on the draft rule for the Register of Distributed Energy Resources (DER).

We see value in collecting and sharing information about small-scale behind the meter distributed energy resources in the national electricity market (NEM). This data will assist in providing visibility of the low voltage network to distribution network service providers (DNSPs) and aid network planning and investment decisions. In addition, it will provide AEMO with improved visibility for load forecasting and modelling.

The draft rule does not however address current weaknesses in relation to the accuracy and completeness of the data being reported. The AEMC is rightly concerned about balancing the need for more information with the cost of providing the data. The draft rule however has the potential to lead to costs with limited additional benefits for DNSPs at least. There are two main areas that the rule change should seek to address:

1. The lack of compulsion for customers to report changes to their DER under the current National Electricity Rules, for example upgrades to solar PV or the addition of a battery. It is almost impossible for a DNSP to effectively monitor changes to existing DER as there may be no interaction with the network during the upgrade process. Without such a requirement the information going into the registry will be inaccurate and deliver few benefits to either the DNSP or AEMO.
2. The quality of existing DER data going into the registry. There is no audit of the DER data supplied from DER providers to DNSPs. While the implementation of an audit program could be a costly exercise, in the absence of such a program and an appropriate ongoing penalty regime there is a real risk that the data provided to DNSPs and onto AEMO is inaccurate. This may limit the visibility of both optimising and managing the risk of DER technologies.

The registry will be an effective tool to improve the visibility of the low voltage network to DNSPs and AEMO but only once the data contained in the registry is accurate and complete. The current draft rule does not provide a mechanism for high quality data capture and does not address existing data quality issues. Collecting information during an initial connection does not capture dynamic changes to equipment settings or upgrades. This information can only be provided by installers and/or DER aggregators. It will therefore be important to find a way to bring these participants into the obligations established by the registry.

If you have any questions on this submission please do not hesitate to contact Natalie Lindsay, Head of Regulatory Affairs on (02) 6589 8419.

Yours sincerely

A handwritten signature in black ink that reads "Chantelle Bramley".

Chantelle Bramley
General Manager Strategy, Regulation and Transformation