

Thursday, 30 January 2014

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Chairman
Australian Energy Market Commission
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RE: Clean Energy Council Submission to ERC0156 Publication of Zone Substation Data Draft Determination

The Clean Energy Council (CEC) welcomes the opportunity to provide this submission to the Australian Energy Market Commission's Draft Determination on the Publication of Zone Substation Data Rule Change (ERC0156).

The Clean Energy Council works with more than 600 solar, wind, bioenergy, hydro, cogeneration, geothermal, marine energy, energy efficiency and energy storage businesses to accelerate the transformation of Australia's energy system into one that is smarter, cleaner and more consumer-focused.

The CEC supports the Commission's direction as proposed in the draft determination and agrees with the data availability criteria, the process of obtaining data from a DNSP and the requests being met with a fee. However, further consideration should be given to the options for charging for access to the data, and the availability of data on the reactive component of demand. These matters are discussed below.

Fees for preparing and collecting data

While the CEC accepts that DNSPs should recover reasonable costs to prepare and provide the data, in order to ensure this outcome the National Electricity Rules should be more prescriptive than simply requiring that fees reflect reasonable costs.

Simply requiring a monopoly provider to "make costs reflective of effort" has not necessarily led to a demonstration of costs being efficient. A person making the request for the data (or the Australian Energy Regulator for that matter) has no way to know if the costs are efficient, reasonable or otherwise.

Draft clause 5.13A(d)(7) should require that DNSPs demonstrate that their fees are reasonable by providing a cost breakdown demonstrating hours, rates and expenses relevant to the task. This approach would also be likely to remove the need for the Australian Energy Regulator to regulate the price of this service, and therefore avoid any associated transitional arrangements.

Availability of data on the reactive component of demand

While it is reasonable to expect that the basic form of available raw data will be real power in MW. There are many cases where the corresponding reactive component of the demand is also recorded (either as MVA, MVAR or Power Factor).

This additional piece of information is a significant component of any analysis for which the data may be used. In its absence any modelling undertaken will have lower value due to the lost accuracy introduced by an *estimated* reactive component.

As written cl. 5.13A(b) of the draft rule implies that the provision of this information is entirely optional for the DNSP. Despite this it is extremely likely that, where recorded, it will be very simple to extract information on the reactive component in the same step as extracting the real power component. The reactive component will simply be an additional column in the same data file.

Where the reactive component is not recorded the DNSP should be able to provide an indication of the values which are used in its planning processes for the zone substation in question. This may simply be an estimated average power factor for example. Since the DNSP holds the requisite knowledge of its network it is best placed to provide this estimate.

In addition, with the prevalence of more intelligent metering and control systems expected to be included in distribution systems in the short term, it is anticipated that the reactive component of zone substations' demand will become more readily accessible over time. On this basis the CEC believes that the draft cl. 5.13A(b)(4) and (5) will rapidly lose relevant as this occurs.

The final cl. 5.13A(b)(4) should require that, where the reactive component of demand is recorded, the DNSP provides reactive power, apparent power or power factor data (as is available). In the absence of any recorded reactive component the DNSP should be required provide an indicative power factor relevant to that zone substation.

Summary

The CEC reiterates support for the proposed rule change and expects that the publication of zone substation demand data with appropriate detail will create opportunities for a broad range of benefits. The CEC believes that the incremental

changes suggested here will add significant value to the rule while being achievable at very low cost, and reinforcing the National Electricity Objective.

Please do not hesitate to contact the undersigned for any queries regarding this submission.

Yours sincerely,

A handwritten signature in blue ink that reads 'Tom Butler'.

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