

Ref: ERC0301

Alex Oeser
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000

23 July 2020

Landis+Gyr response to AEMC Consultation Paper on Technical Standards for DER

Dear Mr. Oeser,

Landis+Gyr is pleased to submit our response to the Australian Energy Market Commission's (AEMC) consultation paper associated with the "National Electricity Amendment (Technical Standards for Distributed Energy Resources) Rule 2020 and National Energy Retail Amendment (Technical Standards for Distributed Energy Resources) Rule 2020" issued on 25th June 2020.

Background to Landis+Gyr

Landis+Gyr is the global industry leader in energy measurement solutions and advanced meter management for electricity, gas, heat and water utilities. Focused on quality, reliability and innovation, Landis+Gyr offers a complete portfolio of energy meters and integrated smart metering solutions, enabling utilities and end-users to use scarce resources efficiently, save operating costs and protect the environment by managing energy better.

Response

As a general statement, Landis+Gyr agrees with the introduction of a process for the setting of DER minimum technical standards to support system security requirements. While Landis+Gyr will not make comment on all questions, we broadly support the introduction of a process through a subordinate instrument rather than defining an explicit minimum technical standard in the NER itself. This approach allows flexibility to account for changes in technology, markets and other external drivers which may not be known or fully understood immediately. Landis+Gyr supports a subordinate instrument that includes a consultation process to determine minimum technical standards.

Further, Landis+Gyr note that any process would need to be flexible enough to keep pace with a rapidly developing ecosystem and changing external factors. Technology is advancing very quickly in the DER domain. Given this pace of change and its continuous nature, our view is that the definition of DER not be not finalised in this process to enable updates as required. Landis+Gyr supports a process where any changes to the DER definition should be a result of consultation. It seems appropriate that specific dedicated technical standards are created based on each particular and agreed definition of a DER.

We thank the AEMC for the opportunity to provide input into this consultation regarding the setting of minimum technical standards for DER in the NEM. We welcome the opportunity to engage in consultation further if required.

Please contact me on 0438 104 862 or opi.taumalolo@landisgyr.com if you have any questions or comments about our submission.

Yours faithfully,



Opi Taumalolo
Head of Product Management, ANZ
Landis+Gyr