

Ms Merryn York  
Chair  
Australian Energy Market Commission

Via the AEMC website using the “lodge a submission” function

18 January 2021

Dear Ms York

**RE: ERC0301 – Technical standards for Distributed Energy Resources**

The Queensland Electricity Users Network (QEUN) appreciates the opportunity to provide a consumer perspective to the AEMC’s draft determination for a more preferable draft rule to create an initial set of technical standards that will apply to Distributed Energy Resources (DER) across the National Electricity Market (NEM).

The QEUN is a consumer advocate representing small business and residential consumers with a particular emphasis on regional consumers. We advocate for affordable and reliable electricity from a resilient national electricity system where the pace of the transition to a renewable energy future is not at the expense of the economy, jobs or reasonable living standards.

On Wednesday 13 January 2021, the Queensland Electricity Users Network met with staff from the Australian Energy Market Commission to discuss the Draft Determination on Technical Standards for Distributed Energy Resources (DER). This discussion has formed the basis of QEUN’s submission.

QEUN proposed that the AEMC consider, as part of the final rule determination, the following points:

- how existing inverters operating in the NEM, which may have latent voltage disturbance ride through capabilities that are not enabled, can be updated to meet the new requirements under the draft rule;
- the implications of introducing the DER Technical Standards on the existing responsibilities of Distribution Network Service Providers (DNSPs) to manage network voltage and customers’ supply, particularly as it relates to existing distribution (not transmission) regulatory obligations around voltage management;
- the potential for arrangements that would allow for the independent testing of existing inverters, either those that are installed or are waiting in stock, to meet the new voltage ride through testing requirements under the draft rule. This is proposed on the basis that installers may have existing stock in substandard inverters, representing a sunk cost;
- in the case that AS4777.2:2020 was the version of the standard included in the final rule, how the number of changes to AS4777.2:2020 beyond those that relate to voltage ride through would be treated. This was raised on the basis that the technical detail of those additional features of the standard are not widely accessible or understood particularly by consumers who will purchase or replace inverters prior to the new standard becoming mandatory;

- that 6 months may not be sufficient time for sufficient stock of inverters to be available and the AEMC should be guided by manufacturers on what time is needed to transition to voltage ride through compliant inverters, especially in light of supply constraints caused by COVID-19.

In addition, QEUN sought:

- information on the cost impact of inverters moving from compliance with AS 4777.2:2015 to AS 4777.2:2020
- clarification on whether the final rule would introduce other requirements for inverter in addition to voltage ride through (for example, cyber security)

The QEUN wish to emphasise that the draft rule affects DER equipment that is located behind the meter. Equipment that is owned, repaired and maintained not by market participants or distribution and transmission network businesses, but by millions of individual owners/consumers. We are concerned the DER technical standards will be used to take control of consumer owned DER equipment without the knowledge or consent of the owners of DER equipment.

We expect that the AEMC will receive few submissions from consumers, the party directly affected by the AEMC's DER technical standards. This is largely because consumers/DER owners have not had sufficient time to be briefed on the new inverter standard. The new inverter standard AS4777.2:2020 was published in December 2020 and submissions to the AEMC's draft rule on DER technical standards closed on 14 January 2021.

Thank you for the opportunity to provide a consumer perspective.

Yours faithfully

A handwritten signature in blue ink that reads 'Jennifer Brownie'.

Jennifer Brownie

Coordinator

Queensland Electricity Users Network