

07 August 2018

Mr John Pierce
Chair
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Draft Rule Determination – Register of Distributed Energy Resources (ERC0227/RRC0011)

Dear Mr Pierce

Energy Networks Australia welcomes the opportunity to provide a submission to the Australian Energy Market Commission's (AEMC) Draft Rule Determination on the '*Register of Distributed Energy Resources*'.

Energy Networks Australia is the national industry body representing businesses operating Australia's electricity transmission and distribution and gas distribution networks. Member businesses provide energy to virtually every household and business in Australia.

Energy Networks Australia and our members have been actively engaged in the consultation processes concerning the establishment of a DER register for Australia, and support its establishment. The register will be a key enabler for distributed level optimisation of DER and will improve power system and network security and operation, through the collection and provision of better information on behind the meter DER.

Support for improved DER reporting

The draft rule determination has identified that Network Service Providers (NSPs) are best placed to collect information about DER connected to their network, and provide this information for inclusion in the register as required. Energy Networks Australia supports this recommendation, and we will build this requirement into the new National DER Connection Guidelines that we are currently developing to establish common requirements for connection agreement processes.

Energy Networks Australia will continue to collaborate with AEMO and the AEMC to align requirements for connections and provision of relevant data with the planned DER register information guidelines.

Energy Networks Australia commends AEMO's efforts in engaging with jurisdiction-level regulators, to improve reporting of DER system details in connection processes, as well as the AEMC's intent to change Chapters 5 and 5a of the National Electricity Rules. However, further work will be required by involved parties to build on this effort, and Energy Networks Australia supports the AEMC's call for safety regulators to investigate how existing compliance mechanisms could be used to improve submission of appropriate data.

In terms of understanding the location and characteristics of existing DER previously connected to the grid without adequate reporting to the NSP, Energy Networks Australia recommends the utilisation of the analysis capabilities of the Commonwealth Department of the Environment and Energy and CSIRO's Energy Use Data Model, to establish this important visibility.

DER register hosting and information access

As stated in previous submissions, Energy Networks Australia is supportive of AEMO being the host of the DER register. Energy Networks Australia looks forward to engaging with AEMO when developing pragmatic DER register information guidelines and transition processes reflective of the current data collection limitations currently experienced by NSPs.

Energy Networks Australia welcomes the AEMC's decision to allow network businesses access to disaggregated information within the DER register. As previously stated, Energy Networks Australia considers there is great benefit in such information sharing between AEMO and network businesses, enabling optimisation of DER utilisation and network hosting capacity.

Early lessons from the Open Energy Networks consultation process

As you are aware, Energy Networks Australia and AEMO are undertaking stakeholder consultation on the functional and technical requirements needed to have visibility, and optimise usage and value, of grid-connected DER through the 'Open Energy Networks' project. Early outcomes from this projects stakeholder consultation have highlighted a few issues that Energy Networks Australia believes should be considered by the AEMC in its final determination. These include:

- » Confirmation that stakeholders consider that the register will be a key enabler to allow optimisation of grid connected DER.
- » The potential inclusion of other potential DERs within the register, other than what has currently been included in the draft determination. For example, electric vehicles and their associated charging systems will become an increasing consideration for networks as future regulatory and technical frameworks likely allow utilisation of electric vehicles as a form of active DER. Without visibility of electric vehicles and associated charging systems, network businesses may find it harder to anticipate localised load or generation responses to market signals.
- » DER and other technology at the "ends" of the power system is rapidly evolving, and regulatory and functional requirements need to be flexible to allow for such change being at a faster rate than previously experienced. To this point, Energy Networks Australia recommends the governance structure of the DER register allows for such agility.

Should you have any queries regarding this submission, please contact Heath Frewin, Head of Distribution, on (02 6272 1531 or at hfrewin@energynetworks.com.au).

Yours sincerely,



Stuart Johnston

General Manager, Network Transformation