

3 August 2018



Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Sir/Madam

**Energy Queensland submission to Draft Determination and Draft Rule for
*National Electricity Amendment (Register of distributed energy resources) Rule
2018 (ERC0227/RRC0011)***

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Commission (AEMC) on its Draft Determination for the *National Electricity Amendment (Register of distributed energy resources) Rule 2018* (draft determination).

As previously noted in our submission to the initial consultation paper for this rule change, Queensland has the highest penetration of distributed energy resources (DER) in the country. Consistently strong interest in DER from our customers presents challenges and opportunities for our distribution network service providers (DNSPs), Energex and Ergon Energy, in the way they manage and integrate DER. These challenges and opportunities also extend to the energy system more broadly, including the influence of DER on the market.

Energex and Ergon Energy already collect DER information from customers through the network connections process to enhance network operation, and to assist forecasting and planning. This static information is also shared with Australian Energy Market Operator (AEMO) to assist with system operation and forecasting.

In response to the draft determination, Energy Queensland:

- broadly supports the establishment of a register for DER across the National Electricity Market (NEM), to be maintained and updated by AEMO, as the most efficient approach to manage the collection of DER information
- agrees that the collection of DER information will enable greater visibility of DER within the NEM and strengthen load forecasting and modelling, which will benefit the planning and operation of networks and the market, and should include DER owned by network service providers as well as end-use customers
- agrees that the collection of DER information through the network connection process is not onerous and notes the potential for alignment with the development of a National DER Connection Guideline by Energy Networks Australia to standardise the DER information to be captured under the draft rule

- notes the challenges for enforcing compliance with the draft rule and will work with Queensland's electrical safety regulator to investigate opportunities to leverage existing mechanisms to enhance compliance outcomes
- notes the fundamental and ongoing obligation for network service providers to protect DER customers' standing data and comply with ring-fencing requirements
- remains prepared to engage with emergency services to ensure that DER information captured is relevant and useable.

Energy Queensland also notes that the draft determination does not consider electric vehicles and electric vehicle charging systems. From a network perspective, electric vehicles are equivalent to a stationary battery, and given the expected increase in uptake of these technologies in the future, capturing this information would be equally important for DNSPs and AEMO.

Should the AEMC require additional information or wish to discuss any aspect of the draft determination in detail, please contact me on (07) 3851 6416 or Trudy Fraser on (07) 3851 6787.

Yours sincerely



Jenny Doyle
General Manager - Regulation and Pricing
Telephone: (07) 3851 6416 / 0427 156 897
Email: jenny.doyle@energyq.com.au