

20 August 2021

Ms Anna Collyer
Chair
Australian Energy Market Commission
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By online submission

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Dear Ms Collyer

Generator registrations and connections rule change draft determination (ERC0256)

AEMO welcomes the opportunity to comment on the Australian Energy Market Commission's (**AEMC**) draft determination for the Generator registrations and connections rule change (**Draft Determination**).

The Draft Determination attributes the draft decision to retain the current 30 MW threshold for classifying generators as non-scheduled in part to AEMO's existing powers to impose specific central dispatch obligations on individual facilities where necessary for adequate system operation and the maintenance of power system security. AEMO agrees that it needs to retain the power to impose specific scheduling requirements where necessary, but is concerned that the current mechanisms in the National Electricity Rules (**NER**) are not sufficiently flexible in practice. If the 30 MW threshold is to be retained, AEMO proposes some modifications to the current mechanisms to support power system operation and promote equity between market participants.

The Draft Determination introduces a new clause 2.1.3 with a new regulatory obligation for AEMO. Essentially, AEMO must develop, maintain and publish Registration guidelines with the requirement to consult on relevant amendments. AEMO supports transparency in relation to its registration processes, and publishes a wealth of material to support registration applicants.

However, we are concerned that the new, broad regulation imposed in the draft rule is not appropriate or proportionate, and was neither foreshadowed in the consultation paper nor proposed in submissions.

It will reduce the ability for AEMO to quickly and flexibly adapt published materials for the benefit of registration applicants and the market, to respond to evolving power system needs as well as changes in rules, technologies and business structures.

Additionally, we are concerned that the draft rule would require AEMO to consult on matters for which AEMO must retain the ability to exercise its independent discretion – in accordance with its functions under the National Electricity Law (**NEL**) and within the extensive registration requirements and criteria already set out in the rules. If the AEMC considers it necessary to

formalise aspects of AEMO's current practice, AEMO considers that the alternative obligations proposed in this submission will better and more appropriately support transparency, flexibility and efficiency, more effectively and efficiently serving the long term interest of consumers. Under these alternative proposals AEMO would:

- develop and publish Generator exemption guidelines subject to consultation with registered participants and interested parties, with appropriate consultation requirements that will not unnecessarily restrict timely responses or the ability to respond to emerging requirements; and
- maintain a resource on its website to provide guidance on registration, classification and aggregation processes.

Further information on these matters, and other aspects of the Draft Determination, is provided in Attachment A.

We would welcome the opportunity to discuss the matters raised in this submission further. Should you have any questions, please contact Kevin Ly, Group Manager Regulation at kevin.ly@aemo.com.au.

Yours sincerely



Tony Chappel
Chief External Affairs Officer

Attachment A: AEMO submission to the Draft Determination

ATTACHMENT A: AEMO SUBMISSION TO THE DRAFT RULE DETERMINATION – GENERATOR REGISTRATIONS AND CONNECTIONS (ERC0256)

The Commission’s draft determination includes four aspects:

1. Retention of the current 30 MW threshold for classifying generators as non-scheduled.
2. Narrowing the grounds upon which a generator can be exempt from scheduling obligations.
3. Requiring AEMO to develop, maintain and publish Registration guidelines that cover all of the registration, classification, exemption and aggregation processes in chapters 2 and 3 of the NER, with the requirement to consult on amendments to the guidelines where applicable.
4. Clarify the connection process and application of performance standards.

This submission provides AEMO’s response in respect of items 1 to 3 above, including proposed modifications to the Draft Determination.

1. Retention of the 30 MW threshold for classifying generators as non-scheduled

1.1. The AEMC’s draft determination

The AEMC attributes its draft decision to retain the current 30 MW threshold for classifying generating units as non-scheduled in part to AEMO’s existing powers under the NER (particularly clauses 2.2.3(c) and 3.8.2(e)) to impose central dispatch obligations where it reasonably considers them necessary for adequate system operation and the maintenance of power system security.¹ The Draft Determination also suggests that the Energy Security Board’s (ESB) Post 2025 market design ‘scheduled lite’ work program is a potential way to improve visibility of non-scheduled resources.

Implicit in this decision is an assumption that the ability to impose scheduling obligations for non-scheduled plant is workable.

1.2. Importance of AEMO’s powers to impose scheduling obligations

The generation mix in the National Electricity Market (NEM) is evolving quickly. AEMO is preparing to be able, by 2025, to manage the power system in a way that allows for all instantaneous demand to be met by renewable generation. As the generation mix continues to rapidly change over coming years and decades, it will be necessary for AEMO to have:

- greater **visibility** of the growing number of relatively small generating units and DER devices in the power system;
- reasonable **forecastability** of their operation; and
- the necessary **controllability** to maintain the security of the power system in the most efficient way.

¹ Draft Determination, page ii.

As the growth of distributed, variable renewable generation continues in the power system transition, it is not possible for adequate power system operation to be maintained without additional measures to ensure appropriate levels of visibility, predictability and controllability of smaller individual facilities and plant aggregations.

For registered generators in the non-scheduled category, AEMO is theoretically able to issue manual directions. However, this requires a pre-existing degree of visibility and controllability and also becomes unworkable as the number of such facilities grows.

Operator response time within the AEMO NEM control room is critical during challenging power system events. Minimising manual interactions and decision-making during these complex events is necessary for adequate system operation and the maintenance of power system security. During these events, the power system is already at heightened risk, and additional manual processes add to an already complex and intensive environment. Following a significant contingency, the need for manual intervention will delay the return of the power system to a secure operating state, likely beyond the 30-minute period provided under NER 4.2.6(b).

Consequently, AEMO's existing powers to impose any necessary scheduling obligations on non-scheduled generators remain important to ensure adequate operation of the power system, but they must be capable of application in an efficient and practical manner. AEMO has provided examples of the obligations that could be imposed in relevant circumstances in its *Guide to Generator Exemptions and Classification of Generating Units*.² These include provision of Short Term PASA information, Medium Term PASA information, submission of dispatch information, or provision of an energy conversion model.

AEMO considers that participation in central dispatch will be increasingly feasible for newer facilities between 5 and 30 MW, as smaller generators are increasingly demonstrating controllability and the ability to respond to wholesale prices, as are required to participate in any scheduling process. However, AEMO agrees with the AEMC that inefficient costs are likely to arise if all generating units 5 MW and above were to be classified as semi-scheduled or scheduled, and required to comply with all of the associated obligations.

1.3. Difficulties of imposing obligations under NER clauses 2.2.3(c) and 3.8.2(e)

AEMO's experience indicates that the imposition of obligations on facilities via NER clauses 2.2.3(c) and 3.8.2(e) can be extremely difficult, particularly (but not only) for existing operational facilities.

AEMO has recently determined a need to impose scheduling obligations for several operational non-scheduled facilities, to reduce power system security risks associated with issuing manual directions in a number of foreseeable circumstances.

AEMO recognises that compliance with new requirements and processes can be challenging, and has sought to engage with the relevant participants to understand their existing capabilities and change requirements, accommodate compliance challenges, and develop implementation

² Available at https://aemo.com.au/-/media/files/electricity/nem/participant_information/new-participants/generator-exemption-and-classification-guide.pdf?la=en. See section 5.3.4.

plans. However, this engagement has revealed various challenges with the process that are detailed in Table 1.

Table 1: Challenges encountered with imposition of obligations on existing facilities

Aspect	Challenge
Lack of information/visibility	<ul style="list-style-type: none"> • AEMO typically has little detail of the current capability of non-scheduled facilities, to understand the scale of change required, and relies on the co-operation of the relevant participant to formulate a set of obligations that can reasonably be implemented and will contribute to improved operational and security outcomes. • If plant upgrades are required, it can be difficult for AEMO and/or the participant to understand or determine the technical limitations of the current plant, particularly for older facilities. • Participants often rely on original equipment manufacturers (OEMs) to provide expert advice. OEM expertise may be difficult to access in a timely manner, if at all (for example, if the OEM has limited or no business interest in Australia).
Stakeholder management and expectations	<ul style="list-style-type: none"> • Meaningful engagement and consultation takes time, can be impacted by complex operational management arrangements, and is heavily influenced by each stakeholder's unique position (both technical and in terms of market opportunity). • Generators may challenge AEMO's view of the issues that necessitate action, or that their plant can or should be part of the solution. Operational or system security challenges are typically presented by the impact of a group or subset of facilities with particular attributes (e.g. size, location, operating patterns), and therefore can only be addressed by participation of the group. A requirement for participation in dispatch cannot necessarily be justified on an individual basis, which some participants may demand. • Multiple, bespoke solutions are difficult to manage and can present operational challenges equal to those that are to be addressed by participation in dispatch.
Timing	<ul style="list-style-type: none"> • AEMO must see the challenge to power system operation or threat to power system security with sufficient lead time, and may need to anticipate a threat before first experiencing it. • The most appropriate solutions needed to mitigate the risk, and the time required for implementation and compliance with new obligations, are often unknown until substantial work has occurred. This will include time to: <ul style="list-style-type: none"> ○ understand the issue and explore options ○ communicate the issue and seek participant support ○ resolve any technical questions

Aspect	Challenge
	<ul style="list-style-type: none"> ○ coordinate, plan and implement changes ● The time required for these activities is largely outside AEMO’s control and visibility, and likely to be impossible to predict.

To reduce these challenges, it would be preferable to be able to foresee future power system requirements at the time of constructing and connecting a generating unit, so that any necessary obligations or conditions can be imposed at that time. However, AEMO may only become aware of some new generating units upon receipt of a registration application, by which time the facility may be substantially built.

In addition, it is not possible for AEMO to reasonably foresee all requirements that may arise during the decades-long life of a new generating unit.

1.4. ‘Scheduled lite’

AEMO acknowledges the benefit in only requiring non-scheduled generators to comply with tailored, lighter scheduling obligations where required for adequate power system operation and the maintenance of power system security. This approach should avoid the imposition of unnecessary costs for generators and AEMO.

AEMO understands that the focus of ESB’s ‘scheduled lite’ proposal has to date been on improving the visibility and participation of flexible demand and aggregators of distributed energy resources (**DER**).

These lighter, voluntary scheduling obligations are also likely to provide a lower-cost arrangement for non-scheduled generators to participate in scheduling arrangements. However, the application of scheduled lite arrangements to non-scheduled generators will require further consideration as part of the design of the mechanism.

1.5. Proposed amendments to improve workability of draft determination

As noted above, the AEMC’s draft determination to retain the current 30 MW threshold for classifying generators as non-scheduled is premised upon AEMO’s powers to impose targeted scheduling obligations on individual facilities where reasonably necessary. However, the sections above highlight operational difficulties with these powers.

To ensure the workability of these arrangements, AEMO proposes rule amendments with the intention of:

- enabling AEMO to impose scheduling obligations or conditions where it reasonably considers that these obligations or conditions are likely to be necessary in future; and
- uplifting the capability of new connecting facilities to facilitate the imposition of obligations on facilities during their operational life.

1.5.1. Clarification of AEMO's powers under NER clauses 2.2.3(c) and 3.8.2(e)

AEMO considers it important that it should be able to impose scheduling obligations and conditions where it reasonably considers that these are likely to be necessary in future to support adequate power system operation and the maintenance of power system security. However, NER clauses 2.2.3(c) and 3.8.2(e) do not indicate that AEMO may consider future power system conditions when making such a determination. Rather, AEMO must determine that it "is necessary" (clause 2.2.3(c)) or "reasonably necessary" (clause 3.8.2(e)), which implies that it must currently be so (not at some future date). Further, it is not clear in the current provisions that the necessity for additional obligations need not arise from the impact of an individual generating unit. Rather, that need may arise from the impact of a group of facilities to which that generating unit belongs.

As explained above, the current wording of the provisions is contributing to the difficulties that AEMO is facing when seeking to impose such conditions on registered participants, and does not accommodate the lead time that may be required for AEMO to impose, and for a Generator to comply with, new conditions.

The Draft Determination acknowledges "the importance for AEMO to have greater visibility over non-scheduled resources as the NEM transitions"³, and that the draft decision to retain the current 30 MW threshold is attributed in part to the existence of AEMO's powers under NER clauses 2.2.3(c) and 3.8.2(e). Consequently, AEMO considers that amendments to these clauses can be made within the scope of this rule change in order to ensure their workability as the NEM transitions.

AEMO considers that amendments to these clauses to explicitly allow the consideration of future power system conditions and groups of generators (rather than the specific generator) will alleviate some of these difficulties and improve transparency for all stakeholders. AEMO proposes that NER clause 2.2.3(c) be amended as follows:

If, in relation to an application under paragraph (b), in AEMO's opinion it is is, or is reasonably likely to be, necessary for any reason (including *power system security*) for the relevant *Generator, or a group of Generators to which that Generator belongs,* to comply with some of the obligations of a *Scheduled Generator or Semi-Scheduled Generator* for that *generating unit,* AEMO may approve the classification on such terms and conditions as AEMO considers reasonably necessary.

Similarly, AEMO proposes that NER clause 3.8.2(e) be amended as follows:

If AEMO considers it reasonably necessary for adequate system operation and the maintenance of *power system security,* or reasonably likely to be necessary in future, *Registered Participants, or a group of Registered Participants,* who may otherwise be exempted from participating in the *central dispatch* process must do so to the extent and in the capacity specified by AEMO.

³ Draft Determination, page 12.

1.5.2. Increases to minimum access standards for non-scheduled generating units

Given the difficulties experienced in retrofitting or adding capabilities to facilities after they have been operational for many years, there will be significant efficiencies for capabilities to be installed at the time of construction where it is reasonably anticipated that they will be required for future power system operability. Consequently, AEMO considers that an uplift to the minimum access standards applicable to non-scheduled generating units⁴ is warranted to ensure that AEMO can readily impose scheduling obligations and conditions on facilities when required.

Specifically, AEMO considers that it is appropriate that the minimum access standard for remote monitoring of non-scheduled generating units, contained in NER S5.2.6.1, is uplifted as part of this rule change. AEMO proposes to require that these facilities must have remote monitoring equipment and remote control equipment that can both transmit data to, and receive instructions from, AEMO's control centres in real time in accordance with rule 4.11.

AEMO considers this in scope because it seeks to ensure the workability of the arrangements in the Draft Determination, and notes that the Draft Determination already includes amendments related to the application of generator technical performance standards.

AEMO also observes that this forward-looking approach, requiring capabilities ahead of when they may be needed, is similar to the approach taken in the AEMC's work on system strength. As explained by Victoria Mollard and James Hyatt: "While we often talk about "just in time" delivery to avoid over-investment, our assessment has been that the substantial transition underway means we need to be purposefully forward-looking in our approach. ... The framework ... is designed to position us for a future where lower emissions energy is seamlessly integrated into the grid."⁵

2. Narrowing of circumstances in which generators may be classified as non-scheduled

The Draft Determination proposes to remove NER clause 2.2.3(b)(1), which requires AEMO to approve the classification of a generating unit as non-scheduled if the primary purpose of the generating unit is local use and the aggregate sent out generation rarely, if ever, exceeds 30 MW. The removal of this clause was proposed by the AEC and supported in AEMO's previous submission.

AEMO acknowledges that the removal of this clause may reduce some flexibility for market participants. AEMO observes that project developers are contemplating new facility configurations, including hybrid facilities, and expects that applications for hybrid facilities will grow in future. AEMO notes that the ability to classify some larger generating units as non-scheduled may allow for alternative scheduling arrangements that provide flexibility for project developers while allowing AEMO to ensure it has sufficient visibility, forecastability and controllability to support power system security. In contrast, the removal of NER 2.2.3(b)(1) may

⁴ AEMO considers that this should apply equally for non-scheduled integrated resource units, if these are introduced through the *Integrating energy storage systems into the NEM* rule change.

⁵ Energy Source & Distribution, Jul/Aug 2021, p39, *System strength – a must in a changing electricity market*.

create a barrier for some existing customers that wish to take steps to supply their own demand locally.

3. Registration guidelines

3.1. The AEMC's draft determination

The rule change request from the Australian Energy Council (**AEC**) raised a concern about the transparency of individual AEMO decisions related to the **exemption** of generating units, above the automatic exemption threshold in AEMO's *Guide to Generator Exemptions and Classification of Generating Units*⁶, focusing on generating units between 5 and 30 MW.

The related request by Mr Damien Vermeer proposed that AEMO be required to consider 'conditional exemptions' to provide enough certainty to allow proponents to follow the most appropriate connection process for 5-30 MW facilities in a timely way.

The Draft Determination introduces a new clause 2.1.3 and new regulatory obligation. It requires AEMO to develop, maintain and publish Registration guidelines that cover all of the registration, classification, exemption and aggregation processes under the NER. The Draft Determination indicates that this obligation would include a range of documentation that AEMO has published in respect of registration processes, including fact sheets, application forms and templates.⁷ The Draft Determination requires AEMO to consult on relevant amendments to the Registration guidelines in accordance with the Rules consultation procedures.⁸ The AEMC indicates that this new obligation is targeted at addressing the AEC's transparency concerns.⁹

AEMO considers that the proposed solution in the Draft Determination, which was neither foreshadowed in the consultation paper nor proposed in submissions, is not a proportionate response to the issues raised by the rule change proponents and does not directly address them. The Draft Determination introduces new obligations and consultation requirements related to all registration processes (not limited to exemption of 5-30 MW generating units that were the focus of the rule change requests), and does not identify a separate problem that requires regulation to the extent expressed in the draft rule.

For information, Appendix A is an indicative list of the documents AEMO currently publishes that it considers would likely form part of the Registration guidelines as described in the Draft Determination. Allowing for some bundling of document updates, AEMO estimates that it may need to undertake 10 to 20 consultation processes per year as a result of stakeholder feedback or to respond to changes in the system or market environment. Using the last 12 months for comparison (as at 19 August 2021), AEMO has published 41 updates to the documents listed in Appendix A, with the updates published on 23 distinct publication dates.

⁶ Published by AEMO under NER clause 2.2.1(c)

⁷ Draft Determination, page 44.

⁸ Clause 2.1.3(d) of the draft rule amendments.

⁹ Draft Determination, page iii.

With each Rules consultation process representing an estimated cost of approximately \$50,000 to \$70,000, this amounts to a total annual cost for AEMO of between \$500,000 and \$1.4 million. Costs for industry participants to participate in consultation would be additional.

As explained in section 3.5 of this submission, AEMO considers that both the AEC's and Mr Vermeer's concerns can be better addressed through alternative arrangements that provide for increased consultation in relation to generator exemptions, without diminishing the flexibility of the current arrangements.

3.2. Registration functions conferred on AEMO

The function of registering and exempting participants in the NEM is directly conferred on AEMO by the NEL (sections 11, 12 and 49(1)(c)), in accordance with the NER. AEMO administers the registration and exemption process for the NEM and is required to exercise its independent administrative discretion to determine applications within the requirements, conditions and criteria set by the NER. As such, AEMO does not need explicit authority from the rules to publish guides on how it exercises those functions, and has been doing so since NEM commencement. By making a rule purporting to give AEMO the 'right' to publish material relevant to its functions, the AEMC is not delegating its rule making power, as suggested in the Draft Determination¹⁰, but rather stepping into AEMO's core statutory functions.

The AEMC's suggestion that it is delegating part of its rule making power in this instance may indicate confusion between:

- a concept of 'guidelines' that may specify substantive conditions and requirements that are not in the rules, within principles set in the rules; and
- an administrative 'guide' explaining the requirements in existing rules (including how they apply across a range of different circumstances), and how applicants can demonstrate they meet the relevant criteria in the NER.

AEMO's exemption guidelines (already provided for in NER clause 2.2.1(c)) are the only element of AEMO's registration documentation that could be considered as approaching the former category. This is because the NER themselves do not provide substantive criteria for exemption. By contrast, AEMO's registration guides, fact sheets and forms fall into the latter category, seeking to clarify or describe the information that AEMO requires on its application forms so that it can reasonably satisfy itself that a registration applicant meets the relevant (extensive) requirements, conditions and eligibility criteria specified in the NER for registration and asset classification. These AEMO documents do not create additional registration criteria that are not already defined in the NER.

AEMO acknowledges that the draft rule would not require AEMO to consult when making minor or administrative amendments to the Registration guidelines, with the Draft Determination indicating that this would include amendments that do not "impact a current or potential participants' rights and obligations".¹¹ On one hand, as explained above, registration is an

¹⁰ Draft Determination, pages iii and 44.

¹¹ Draft Determination, page 44.

administrative process and on that basis any change could be regarded as 'administrative'. However, AEMO considers that updates to the various registration documents often provide clarification or information about the evidence that current and prospective participants must provide to demonstrate the requirements set out in the NER, and that such changes may have cost impacts for applicants. Given this, AEMO considers that it will be uncommon that changes can be definitively considered to be minor or administrative.

3.3. Importance of transparency and flexibility

AEMO notes the observation in the Draft Determination that AEMO would not be required to publish any more information than it does at present. AEMO already publishes extensive material about the registration processes that has proven to be valuable for stakeholders, promotes certainty, transparency and consistency, and reduces the number of enquiries that current and prospective participants need to make through the AEMO Support Hub.

Under the current rules, AEMO is able to flexibly set, and quickly update, its registration guides, fact sheets and forms based on stakeholder needs and feedback, for the benefit of current and prospective market participants. When a proponent considers a guide to be unclear or inconsistent and approaches AEMO to seek clarification, AEMO directly uses this feedback to understand how to improve its documents to increase their clarity or provide for application to new or changing circumstances. AEMO's experience suggests that this approach has been particularly helpful in situations where:

- There are common gaps in proponent knowledge and understanding of NER requirements, which AEMO's guides and fact sheets can help to alleviate.
- New and emerging technologies and business structures are not adequately covered by existing guides, and may present challenges for market or power system operation.

With increasing innovation in facility types and configurations, and a broadening range of entities seeking to register in the NEM (many with less experience of the market), this flexibility is becoming increasingly important.

The consultation requirements proposed in the Draft Determination will reduce this flexibility in the current framework to adapt to new approaches, facility configurations and business models. This would be inefficient, is unnecessary and has the potential to add cost and/or delays for new market entrants that would be likely to flow through to higher costs for consumers.

3.4. Consultation must be appropriate and fit for purpose

With the possible exception of exemption criteria, AEMO considers that consultation on its registration resources is simply not appropriate. The guides are of an administrative nature. They explain the conditions and criteria that are extensively prescribed in the rules, and the information AEMO requires to determine whether an application meets those requirements. They include matters on which AEMO must retain the ability to exercise its independent discretion in accordance with its NEL functions, for which consultation will not always be productive.

For example, AEMO may approve classifications or aggregations subject to conditions, that must be based on the needs of the power system. These conditions must be determined by AEMO to support the fulfillment of the AEMO power system security responsibilities set out in NER clause 4.3.1. AEMO's guides may need to provide changing examples of these matters based on the evolving needs of the power system that AEMO is responsible for managing.

3.5. Summary and proposed alternative arrangements

AEMO considers that the proposed Registration guidelines requirement as set out in clause 2.1.3 of the draft rule may negatively impact three of the four elements of the AEMC's assessment framework for this rule change.

- The loss of flexibility has the potential to delay the entry of new facilities that may:
 - contribute to power system security and reliability – contrary to the principle “Enhance security and reliability”; or
 - assist in reducing prices – contrary to the principle “Promote efficient investment”.
- As acknowledged in the Draft Determination, the proposed solution will add administrative and regulatory burden – contrary to the principle “Minimises administrative and regulatory burden”.

For the reasons discussed in this submission, AEMO considers that the proposed obligation is contrary to the long-term interests of consumers and does not respond proportionately to the issues raised in the rule change requests.

While AEMO agrees with the AEMC that a requirement to publish reasons for individual exemption decisions is not appropriate, this submission proposes alternative obligations that could better address the AEC's and Mr Vermeer's concerns without diminishing the flexibility of the current registration guides. These would include obligations for AEMO to:

- develop and publish Generator exemption guidelines subject to consultation with registered participants and interested parties, with appropriate consultation requirements that will not unnecessarily restrict timely responses or the ability to respond to emerging requirements; and
- maintain a resource on its website to provide guidance on registration, classification and aggregation processes under NER chapter 2 and clause 3.8.3.

3.5.1. Generator exemption guidelines

As indicated in section 3.2, the categories and conditions to be met for exemption from the requirement to register as a Generator are specified in AEMO's exemption guidelines and not by the NER. The Draft Determination (paragraph 11) also explains the reason for including the new clause 2.1.3 by reference to the importance of the exemption from registration as a Generator, which determines the application of particular NER processes and obligations.

If the AEMC can demonstrate a need that can only be met by regulation, AEMO suggests that the NER could include a proportionate consultation requirement for exemption guidelines that

allows sufficient flexibility to respond to new and developing situations consistent with AEMO's statutory functions. Such an obligation would require AEMO to consult on changes to exemption categories and the associated conditions.

3.5.2. Publication of a resource on the AEMO website

To support the transparency that AEMO already provides, AEMO considers that a requirement could be included in the NER to maintain a resource on its website to provide guidance on registration, classification, exemption and aggregation application processes. The resource would include the items contemplated in clause 2.1.3(b)(1) to (4) of the draft rule, with the exception of 'information that AEMO may make available' at each stage of an application process. AEMO does not understand what this is intended to refer to.

The resource could include the exemption guidelines for the purposes of clause 2.2.1(c) which, as discussed above, may be subject to consultation requirements that take account of the considerations raised in this submission.

Appendix A List of existing AEMO documentation covered by proposed Registration guidelines

Document	Application Type
Guide to Generator Exemptions and Classification of Generating Units	Generator exemption and registration
Application for exemption from registration as a Generator	Generator exemption
Application for a Notifiable Exemption	Generator exemption
Exemption from Registration (Intermediary) Trustee Deed Poll	Generator exemption
Exemption from registering as a Generator in the NEM based on appointment of an Intermediary fact sheet	Generator exemption
Application for registration as a Generator in the NEM	Generator registration
NEM Generator registration guide	Generator registration
Generator Capability Declaration	Generator registration
Notification Form – Energise Auxiliary Load	Generator registration
Registering a hybrid generating system in the NEM fact sheet	Generator registration
Registering a battery system in the NEM fact sheet	Generator registration
Connecting and energising a generating system prior to registration fact sheet	Generator registration
Metering requirements for a generating system in the NEM fact sheet	Generator registrations
Energy Conversion Model (ECM) Guidelines	Generator registration
NEM Operational Forecasting and dispatch handbook for wind and solar generators	Generator registration
Generator Connection R1 Submission Checklist	Generator registration
Interim arrangements for utility scale battery technology	Generator/Customer registration

Document	Application Type
Application by transferor for transfer of registration as a Generator in the NEM	Transfer registration
Application by transferee for transfer of registration as a Generator in the NEM	Transfer registration
NEM Generator transfer guide	Transfer registration
Guide to Market Systems – NEM Change of Ownership guide	Transfer registration
Application for registration as a Customer in the NEM	Customer registration
NEM Customer registration guide	Customer registration
Application for registration as a Small Generation Aggregator (SGA) in the NEM	SGA registration
Small Generation Aggregator Fact Sheet	SGA registration
Application for Registration as a Market Ancillary Service Provider (MASP) in the NEM	MASP registration
Application for Registration as a Demand Response Service Provider (DRSP) in the NEM	DRSP Registration
NEM DRSP registration guide	DRSP Registration
DRSP Applicant Capability Declaration	DRSP Registration
Information Form NEM Control Equipment Details	DRSP Registration
Interim arrangements for Frequency Control Ancillary Services (FCAS) provision from Distributed Energy Resources DER – policy on classification of loads as ancillary service loads	Ancillary Service Loads classification
Application for registration as a Network Service Provider in the NEM	NSP registration
NEM Network Service Provider registration guide	NSP registration
Network Service Provider classification and exemptions guide	NSP registration

Document	Application Type
Application by Existing TNSP to Classify Dedicated Connection assets	NSP classification
NEM Dedicated Connection Asset Classification Guide	NSP classification
Application for Registering as a Metering Coordinator	Metering Coordinator registration
Application for registration as a Reallocator in the NEM	Reallocator registration
Application for registration as a Trader in the NEM	Trader registration
Auction Participation Agreement	Trader
Fact Sheet - Establishing if a person is Not a Retail Client document	Trader/Reallocator registration
Application for Registration as an Intending Participant in the NEM	Intending Participant registration
Intending Participant fact sheet	Intending Participant registration
Schedule of Rights and Obligations of Intending Participants	Intending Participant registration
Application for the Appointment of a Registered Participant Agent	Registered Participant Agent application
NEM general application guide	Miscellaneous registration
NEM Participant Trustee Deed Poll	Miscellaneous registration
Schedule 3.1 notification form	Miscellaneous
Letter of Authority template	Miscellaneous
Application to be a Project Developer in the NEM	Project Developer application

Document	Application Type
AEMO guarantee pro forma	Market Participant Credit Support
Guide to AEMO Credit Support Management	Market Participant Credit Support
Recipient-created tax invoice agreement	Market Participant Settlement