



Ausgrid Response

AEMC Draft rule on Technical standards for DER

December 2020



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Ms Merryn York
Acting Chair
Australian Energy Market Commission
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Submitted online

Dear Ms York,

Ausgrid is pleased to provide this submission to the Australian Energy Market Commission's (AEMC) draft rule determination on Technical Standards for Distributed Energy Resources (DER).

There are significant changes occurring across the energy market in Australia. We are moving from a system dominated by one-way flows of energy from large-scale power generators towards a more distributed energy market, where small-scale generation forms an important part of the energy mix and consumers of energy have greater power and control to reduce costs across the energy and supply chain.

We broadly support the draft rule's approach of setting DER technical standards through the adoption of AS4777.2, as updated from time to time. This will avoid the risk of inconsistencies or duplication of effort from those set in the standard.

Like most other distributors, we already require compliance with this standard as part of our connection agreements and as such we will not need to make any changes to comply with the draft rule.

We do, however, have the following comments and suggested changes to the draft rule and determination:

- We suggest that the rule is re-drafted to **not** include any extracts from AS4777.2 so that the rule does not have to be updated if the standard is changed at a later date. We suggest the DER Technical Standard is instead defined as the version of AS4777.2 in force, as updated from time to time.
- The rule should commence 12 months after it is made, consistent with Standards Australia's approach to implementation of the new requirements, which allows compliance with either the 2020 or the 2015 versions of the standard for the first 12 months after it is adopted, which occurred just before Christmas. The only exception to this approach for implementation should be for the ride through test which should commence six months after the rule is made.
- Clause S5A.2.1(g) in Schedule 5A.2 of the draft rule should be amended to require that the inverter be tested with the power quality response mode settings for Australia A in the DER Technical Standards, which is the most common setting. As a consequence of this change Schedule 5A.2.1 - Power quality settings to be applied during testing should also be deleted.

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It is unnecessary for all DNSP settings to be tested. In addition, the ENA website which has been relied on to populate these settings is not an appropriate reference to use. This is because it is a static point in time list of DNSP mandatory settings.

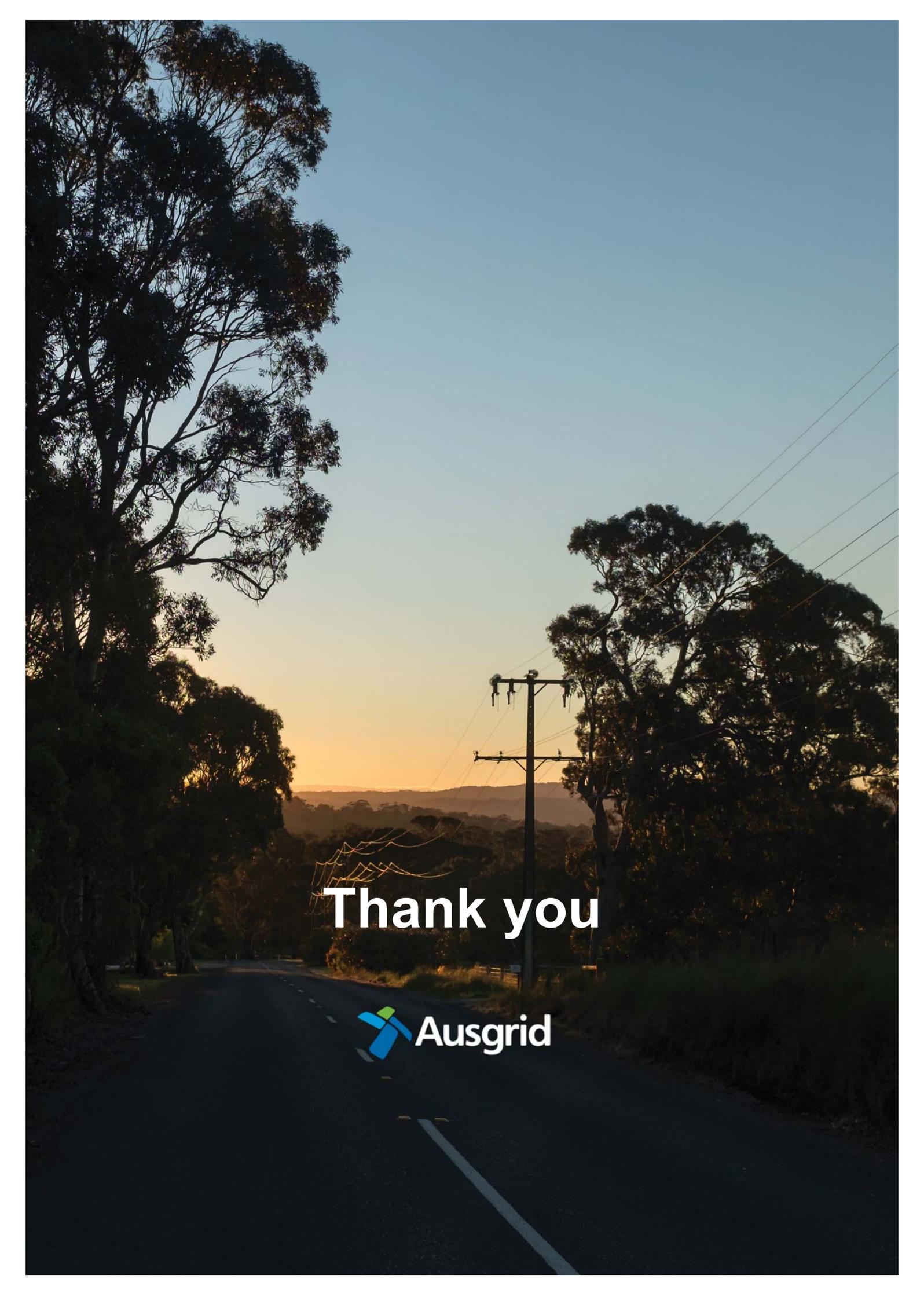
- The rule should also recognise that DNSPs can specify variations to AS4777.2: 2020 where we are currently not able to comply with the new standard's requirements because of the current requirements of the network. This would be an interim measure until we are in a position to accept full compliance with the new version of the standard.

Should the AEMC have any questions in relation to this submission, please contact Nathan Laird, Planning Policies and Procedure Manager on 02 9160 6853 or nathan.laird@ausgrid.com.au.

Yours sincerely



Junayd Hollis
Executive General Manager – Asset Management

A scenic landscape at sunset. A paved road with a dashed white line on the left and a solid white line on the right leads into the distance. The sky is a mix of blue and orange, with the sun setting behind a range of hills. Large trees are silhouetted against the sky, and a utility pole with power lines is visible in the middle ground.

Thank you

