

14 January 2020

Australian Energy Markets Commission  
GPO Box 2603,  
Sydney, NSW, 2001

Submitted electronically

Attention: Rupert Doney

Dear Sir or Madam,

### **Technical Standards for Distributed Energy Resources – ERC0301**

The Australian Energy Council (AEC) welcomes the consultation opportunity in the Australian Energy Market Commission (AEMC) Rule Change Consultation on the rule change request submitted by the Australian Energy Market Operator (AEMO) on the creation of a subordinate instrument for a minimum technical standard for distributed energy resources (DER).

The AEC is the industry body representing 22 electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. These businesses collectively generate the overwhelming majority of electricity in Australia and sell gas and electricity to over 10 million homes and businesses.

The AEC is represented on a number of industry forums that are developing technical standards and protocols to support DER integration and is directly represented on the Distributed Energy Integration Program.

The AEC supports the AEMC's draft determination to make a more preferable rule that does not obligate AEMO to establish and maintain DER minimum technical standards. We support the creation of a definition of DER Technical Standards in the National Electricity Rules (NER). We support the AEMC being responsible for these definitions.

The AEC supports the incorporation of Standards Australia's AS 4777.2:2015 and a new Schedule 5A.2 of the NER, which would incorporate AEMO's short duration undervoltage response testing requirements. Notwithstanding this support, we have remaining concerns about the incorporation of AS 4777.2:2015 regarding implementation timelines and interactions with State schemes, which will impact upon consumers. As such, we urge the AEMC to consider a staged approach to incorporating the separate elements of AS 4777.2:2020 into the NER. In particular we seek the deferral of the power quality response mode requirements for a period of 12 months, after which time the AEMC could undertake a more formal cost benefit analysis drawing upon authoritative research undertaken in that intervening period.

Any questions about this letter should be addressed to David Markham by email to [david.markham@energycouncil.com.au](mailto:david.markham@energycouncil.com.au) or by telephone on (03) 9205 3107.

Yours sincerely,

**David Markham**

Networks and Distributed Energy Resources Policy Manager  
Australian Energy Council