



Part of Energy Queensland

14 January 2021

Ms Merryn York

Acting Chair
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000

Dear Ms York

RE: ERC0301 Technical Standards for Distributed Energy Resources Draft Determination

Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy), as distribution network service providers operating in Queensland, welcome the opportunity to provide comment to the Australian Energy Market Commission (AEMC) in response to the Draft Rule Determination on Technical Standards for Distributed Energy Resources (DER) (Draft Determination).

Energex and Ergon Energy generally support the Draft Determination to include the DER Technical Standard within the National Electricity Rules (NER). In particular, we support the AEMC's proposal to include short duration undervoltage response testing requirements for AS/NSZ 4777.2 compliant inverters. We note that AS/NZS 4777.2:2020 has now been published and suggest that the rule change is updated appropriately to include optionality for AS/NZS 4777.2:2020 where relevant. This inclusion will ensure that new inverter models are not required to seek approval for old standards and new standards when the new standards are superior. We suggest it is prudent to include a short duration under voltage response testing requirement despite the release of AS/NZS 4777.2:2020 as there is potentially 12 months of time for manufacturers to gain compliance to the new standard.

Regarding schedule 5A.2.1, it is our view that power quality settings will not impact the ride-through testing and it would therefore be inefficient to require manufacturers to run the same test six times, as currently prescribed in the Draft Rule. Furthermore, as these settings are jurisdictionally maintained, there is the potential for the relevant provision in the NER to become quickly outdated. We consider that rather than prescribing these tables in the NER, reference to a single set of representative settings would ensure suitable functionality and would provide sufficient flexibility to maintain currency. As such, we suggest using the Region A settings from the now published AS/NZS 4777.2:2020 standard as suitable representative settings.

Energex and Ergon Energy note the proposed wording could also pose a problem for application to stand-alone power systems (SAPS). It is our view that flexibility around SAPS connections is required as those inverters will not necessarily comply with AS/NZS 4777.2, and given there are other off-grid inverter standards which are more appropriate, there may be no technical requirement for them to comply with this standard. Therefore, the Draft Rule should be amended to clarify that the DER Technical Standard does not apply to SAPS.

While we support referring to AS/NZS 4777 in our contracts (and we do in our connection standards STNW1170 and STNW1174), we always ensure to refer to the latest standard version. We are concerned that the NER would not be updated in a sufficiently timely manner to maintain reference to the current standard. As such, we suggest any reference to AS/NZS 4777.2 include words to the effect 'or any subsequent version'.

Finally, we seek clarification on the definition of micro-embedded generator connections. Our understanding from the current wording of the rules, referring to AS/NZS 4777 broadly, is that the definition as per the latest published standard applies (at the time of writing according to AS/NZS 4777.1:2016, that is up to or equal to 200 kVA).

Should the AEMC require additional information or wish to discuss any aspect of this submission, please contact either myself, on 0429 394 855 or Barbara Neil on 0429 782 860.

Yours sincerely



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