

AEMC

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**Consultation on the proposed obligation on AEMO to create a subordinate instrument for a minimum technical standard for distributed energy resources (DER) and a definition of DER in the NER**

Solar Analytics welcome the opportunity to provide input to AEMC on the above consultation paper.

Solar Analytics (SoIA) is an Australian company founded by solar industry veterans, scientists, developers and passionate photovoltaic (PV) experts. We design, develop and supply intelligent rooftop solar and energy management solutions for residential households and commercial businesses. With 35 staff and 40,000 customers across Australia, we are the leading independent provider of rooftop solar management in Australia. With the largest fleet of real time solar + energy consumption in Australia, we provide energy data to seven DNSPs, AEMO, ESB and other energy regulators.

**SoIA support the intent of the proposal for AEMO to establish national DER technical standards.** We have a number of recommendations for the proposal:

- Require AEMO to include DER industry (manufacturers and service providers as well as DNSPs) and consumer group representation on the advising and technical body in a paid role
- Align with national standards, industry supported <https://www.dermonitoring.guide/> IEEE 2030.5 interoperability work with minimum standards to be regulated in the NER.
- Include the requirement for AEMO to value greenhouse gas emissions and implement standards consistent with Australia's commitments under the Paris accord
- Include an assessment on the cost impact on both DER and non-DER customers, including the reduction in wholesale electricity prices due to DER

## Specific Questions

### 1: ASSESSMENT FRAMEWORK

- Do you agree with the proposed assessment framework? Should the assessment framework include any additional considerations, and if so, what are they and why?

We agree with the proposed framework. We specifically note the above suggested points under this framework.

### 2: SETTING THE INITIAL STANDARD AND DEFINITION OF DER

- Should the initial DER technical standard be set by AEMO?

This should be guided by a technical reference group.

- Should the minimum standards be inserted into the minimum content requirements of connection contracts, negotiation frameworks and model standing offers or terms?

They should be in a national set of standards (eg NER)

- What should the standard apply to and is a DER definition needed in the NER?

Yes it is required. Should include all large loads inc How Water and Air Con.

- Do stakeholders agree that the standard should only apply to new and replacement devices? Will this meet the objectives of the desired policy outcome of this rule change request?

New DER only (or major up[grade])

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### 3: CONTENT AND DURATION OF THE INITIAL MINIMUM TECHNICAL STANDARD

- Should the scope of the initial technical standard be limited by the NER?

Ideally national

- If so, should there be arrangements to allow for a review of the scope at a future date?

Yes

- Should the role of AEMO in setting DER minimum technical standards (the subordinate instrument) be limited in time, with the ESB's governance review outcomes to be introduced into the framework at a later date?

No

### 5: COST OF THE INITIAL STANDARD

- Considering AEMO's proposed initial standard in section 5.2, Box 1, what are the expected costs and benefits of implementing the initial standard for consumers, other affected parties and DNSPs?

This needs to be assessed

Regards



Stefan Jarnason  
CEO