# Stakeholder Feedback Template

This template has been developed to enable stakeholders to provide their feedback on the draft DER Register Information Guidelines.

AEMO encourages stakeholders to use this template, so they can have due regard to the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern.

Stakeholder submissions will be published on AEMO's website unless they are clearly marked as being confidential. Submissions should be sent to DERRegister@aemo.com.au by Wednesday, 24 April 2019.

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| | Questions | Feedback |
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| 1 | Is 1 KW as appropriate minimum size of small generating unit to capture in the DER Register? | We recommend that zero KW is appropriate as we have many units with a nil export connection. |
| 2 | Are standard, packaged reports also required for NSPs? If so, what information is required? | Yes - these reports (contents yet to be defined) would be useful for reconciliation of data between AEMO & DNSP. |
| 3 | What is the most effective means to communicate and inform key stakeholders on how to use the DER Register? | AEMO website, AEMO webinar/s for a walkthrough of new functionality, communication through the CEC and any other relevant industry bodies. |
| 4 | Timeframe for submission by installers once they have accessed the information in relation to an installation? | 20 business days following an installation. |
| 5 | Timeframe for the data entry to timeout and automatically submit, given it is not accessed by an installer? | 20 business days following an installation. |
| 6 | Views from DNSPs on how the designation of data fields as editable or read-only should work. For example, do DNSPs want autonomy over this designation as there are unique circumstances in their network or connection process, or can AEMO designate this in the system design? | We recommend that the designation of fields as editable or read-only should be determined by the DNSP. There may be varying circumstances per installation or network that will be require different data updates. |

| 7 | How would DNSPs and installers wish to receive notifications? | Notifications should be received similarly to the communication method employed for updating the register (e.g. replicating the SMP process) |
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| 8 | Are there additional post-submission validation checks that would be of value in step 1.11? | CitiPower Powercor finds it difficult to comment on this as firstly we would like to see details of what data validation AEMO will be undertaking at this step before being able to provide feedback. |
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**Draft DER register information guidelines**

| Section | Subsection | Issue | Suggestions |
|---|---|---|---|
| **F.3** | Overview of DER Register Draft Collection Process flow | | CitiPower Powercor has given considerable thought to the data collection and submission process and strongly disagrees with the concept of the installer submitting information directly to the register.<br><br>The following are reasons we disagree with this proposal:<br><br>• At step 1.4 the NSP, in many instances, will not have all the mandatory data to submit to the register, this data will only be available following completion of the installation (step 1.5)<br><br>• If the NSP cannot submit before the installation has concluded then the installer will be expected to submit to the NSP and AEMO. To simply this it makes sense that the installer submits once and directly to the NSP.<br><br>• To reduce manual effort, at step 1.14, where the NSP has to validate data, attempt to contact installers and chase them for information it would be more efficient to do this at the commencement where all the data is collected by the NSP.<br><br>• Under the Rules, the obligation of providing DER information to AEMO only resides with the NSP. The installer is not.<br><br>We propose the collection process be updated so that the installer submits their required data directly to the NSP who then has the opportunity to validate and ensure completeness before submitting directly to the register. This also avoids additional effort of completing |

| | | | these tasks later on, as currently outlined in the process flow. |
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| **4.5.3** | AEMO's conclusion (Draft Report) | What is AEMO's timing for release of the "plain language" guideline "Guide to the DER Register – how to submit and receive information". | This is required by our business by mid-May, at the latest, to assist with our design and development of system changes and ensure readiness for 1st December. |
| **F.1** | Assessment of draft Information Collection Framework against DER Register principles | 4th point of item 1 says "The extent to which DNSPs allow information submitted to the DER register to be edited by installers will be controlled by the DNSP, rather than the DER Register." | How is it expected that DNSPs will be able to provide/not provide update access for installers to update specific fields in the register? |
| **F.3** | Overview of DER Register Draft Collection Process flow | | CitiPower Powercor recommends that this process flow and supporting information be included in the DER Register Guidelines. |
| **F.3** | Overview of DER Register Draft Collection Process flow | What data do NSPs submit to the DER Register as part of Step 1.4? F.2 says "DNSP enters relevant Data Model Level 1 and associated default data (DNSP-defined) and job number into the DER Register". | CitiPower Powercor recommends the guideline be updated to clearly identify the data items to be entered at this step. |
| **F.3** | Overview of DER Register Draft Collection Process flow | How are NSPs to be advised of data validation failures (from step 1.12)? What is the NSP expected to validate at this step? | CitiPower Powercor recommends this information be documented in the guideline. |
| **F.3** | Overview of DER Register Draft Collection Process flow | What is AEMO validating at step 1.11? | CitiPower Powercor recommends this information be documented in the guideline. |
| **F.3** | Overview of DER Register Draft Collection Process flow | If there are any exceptions at step 1.4, how will the NSP be notified? | CitiPower Powercor recommends this information be documented in the guideline. |

| 4 | Responsibilities | The first paragraph of this section states "Clause 3.7E(d) requires NSPs to provide information to AEMO in accordance with these Guidelines" | The guidelines needs to clearly state (apart from within the data model) what are the responsibilities of the NSPs and what are the responsibilities of the installers. We would also recommend including information about the responsibilities of installers (if not removed from the submission to register process). |
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| 4.2 | Existing DER generation information | The 2nd paragraph in this section includes the sentence "AEMO requires NSPs to provide all existing DER generation information that the NSPs hold by the commencement date (1 December 2019) in a manner agreed between the NSP and AEMO." | The guideline needs define how existing data for Solar PVs & batteries is to be provided. When will AEMO communicate what is expected as part of the backfill? CitiPower Powercor would like to highlight that when providing existing DER information on or before 1st December we cannot guarantee all data that will be expected after 1st December will be available for these existing DER installations. |
| 4.3 | Data submission frequency and timing | The maximum period for a completed submission of DER generation information for a site installation is 20 business days following the date of the installation. | Can you please clarify what particular information is used to trigger the start of the 20 business days? Does the 20 business days also include dealing with exceptions? If the installer does not provide all or some of the information within the 20 business days and the NSP then has an obligation to update the information does the 20 business days restart? |
| 4.3 | Data submission frequency and timing | The maximum period for a completed submission of DER generation information for a site installation is 20 business days following the date of the installation. | The wording only suggest this is just following installation, we suggest this be extended to include for a change and decommission. There should also be a separate process flow for a change and decommission included in the guidelines. |
| 4.4 | Format of Data submission | CitiPower Powercor currently doesn't use API's to interact with AEMO. | In order to simplify the implementation of the necessary system changes we recommend the use of FTP. Currently, some participants that transact with AEMO do so via FTP and this should also be extended for the submission to the DER Register. |
| 6 | Access to DER Generation Information | | CitiPower Powercor seeks clarification that we will have access to our customer DER information on a daily basis in order to update our systems? |

| Appendix A | Data Model | | CitiPower Powercor recommends:<br><br>• The protection control modes defined under L1 should be moved to L2. (Note: This information is repeated in L2 for non-inverter connections).<br><br>• L1 information should be entered by the DNSPs (including the phase information).<br><br>• Pick lists should be available at L2 – for inverter and non-inverter connections. Based on the selection criteria, only relevant information should be visible for data entry. |
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| Appendix A | Data Model | | CitiPower Powercor seeks clarification re what information will be required for non-inverter connections. We would like to incorporate these requirements in our project for the DER Register so that we don't have to expand additional effort and need to stand up another project for these changes in the future. |
| Appendix A | Data Model | | The data model currently describes the Field Type / Validation & Data Source for each date item in each level. To give a clearer understanding of the data requirements of the DER Register, we recommend that the usual AEMO methodology of M (Mandatory), R (Required) or O (Optional) be used in the data model against each data item. |
| Appendix A | Data Model | | CitiPower Powercor also seeks clarification where fields are listed as mandatory but either the NSP or Installer does not have the at the time of submitting to the register can a submission still complete or will AEMO have validation that stops the submission into the register because mandatory fields are missing? |
| Appendix A | Data Model | Number of phases and Number of phases with DER installed | Both fields have 2 Data sources, how will it be determined which party will update these fields?<br><br>CitiPower Powercor recommends that only the NSP should be the Data source for this data. |
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