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
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)
8	Are there additional post-submission validation checks that would be of value in step 1.11?	United Energy 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.

Draft DER register information guidelines

Section	Subsection	Issue	Suggestions
F.3	Overview of DER Register Draft Collection Process flow		United Energy believes the connection process proposed by AEMO supports a negotiated connection process. Most of the DER installations on our network are 'basic' or 'automatic' connections where we receive DER information from retailer after the system is installed. The proposed process by AEMO intends to introduce a new step so that the mandatory information can be captured and registered by the DNSPs (such as job #). It is our view that DER data should be collected and entered to the register at the installation stage by the DNSPs and leverage data collection from existing processes (i.e. retailer providing DER information along with meter requests for example). This will ensure: • Captures the 'static' installed data; • Data is entered by the DNSPs and therefore are responsible for the data as per the Rules; • Manages exception handling earlier in the collection process and addressed within DNSP connection process; • Adheres to various connection processes adopted by the DNSPs; • Avoids additional system and process changes that are currently in place; • Avoids unnecessary connection enquires that do not

			eventually proceed to a connection (but are registered in DER Register). In light of the above, AEMO should review the mandatory data fields stipulated in this proposal. In order to avoid manual data entry, it is recommended that such information are pre-loaded based on NMI (i.e. referencing to the DNSP) with over-write capabilities. Should AEMO adopt the proposed process, that is, DNSPs providing all connection related information in the Register with the installers providing other DER information, as defined in the draft guidelines, then: • Further clarification is required as to what DER data that can be entered by the DNSPs at Step 1.4 o It is not clear whether data relating to various levels (Level 1 to Level 3) would be available at Step 1.4 noting that a number of connection application information resides in Level 2 (e.g. power quality information relating to inverters). o If L2 information is available only after L1 information is completed, then all L1 information should be entered by the DNSP (including number of phases). o The DER Information Guideline should clearly stipulate roles and responsibilities as it is not clear who will be entering information relating to inverter power quality settings for example. Our view is that all connection related data prescribed in the Connection Agreement and/or Market Standing Offer should be available for entry by the DNSPs. This connection information should be available for editing only by the DNSPs. In order to avoid manual data entry, it is recommended that such information are pre-loaded based on NMI (i.e. referencing to the DNSP) with over-write capabilities (mainly for some negotiated connections). • Information relating to the DER is to be inputted by the Installers. The AMI portal should have the following

			capabilities: o All fields should be entered by the Installers prior to Submitting data to the DER Register (Step 1.9) ▪ This can be catered for in Step 3.1 ▪ If fields are left 'blank', then the data should not be submitted. After 20 business days, this should be promoted to DNSPs to action. At this point, the clock should be re-started. o Additional validation should be undertaken in Step 3.1, not including: ▪ Comparison against installed capacity (Inverter capacity) against export limits • Further clarification is required as to what data validation will be undertaken in Step 3.1. • Once the data is entered by the Installer, it should be submitted to the DNSPs. • The DNSPs then submit the data to AEMO. Significant changes to existing systems and processes required to facilitate the above (i.e. creation of unique identifier, usage of this identifier by the retailer for meter reconfiguration etc.)
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		United Energy recommends that this process flow and supporting information be included in the DER Register Guidelines.
F.3	Overview of DER Register Draft	What data do NSPs submit to the DER Register as	United Energy recommends the guideline be updated to clearly

	Collection Process flow	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".	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?	United Energy 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?	United Energy 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?	United Energy 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).
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? United Energy would also 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	The maximum period for a completed submission of DER generation information for a site	Can you please clarify what particular information is used to trigger the start of the 20 business days?

	timing	installation is 20 business days following the date of the installation.	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	United Energy 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		United Energy 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		United Energy recommends: • The protection control modes defined under L1 should be moved to L2. (Note: This information is repeated in L2 for non-inverter connections). • L1 information should be entered by the DNSPs (including the phase information). • 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.
Appendix A	Data Model		United Energy 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		United Energy 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? United Energy recommends that only the NSP should be the Data source for this data.