WEM Procedure Submission Template

DER Register Information

Stakeholder Submission

Name of stakeholder: AGL

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Relevant Procedure Paragraph(s)	Comment
General	AGL supports the proposed improvements proposed by this consultation to improve the quality and detail of the DER information which is captured.
General	Enumeration of Data. Given the recent experience of replacing substantial quantities of uncontrolled data (eg text) within MSATS to enumerated values, AGL strongly suggests that as far as possible this database be enumerated and that enumerations relating to equipment (eg make, model etc) be managed outside the procedure with a simple update process, similar to the manner in which meter make / model is being managed for MSATS.
General	While this document refers to a Technical Specification, it seems to contain many technical statements (eg representational state transfer API architecture). AGL considers that this procedure should focus on the business obligations relating to the information to be captured and shared with AEMO, not the mechanisms for uploading and storing said information, which AGL feels more appropriately sits in the Technical Specification.
Item – Use of only 'DER'	AGL notes that the procedure only ever refers to DER, and never to 'Distributed Energy Resources'. It seems reasonable that the full title of the register should appear early, such as in the Purpose & Scope.
Definition of Electric Vehicle	Noting the purpose of the register, the definition of Electric Vehicles would most likely also include Hybrid vehicles. AGL considers that these vehicle types are not intended to be included unless they are also capable of being charged externally via an EVSE.
Definition – NMI	General practice is to define the acronym as well as use - eg A National Metering Identifier which is a unique identifier assigned to a connection point. Note – this definition is also inconsistent with the definition in the WEM DER Technical Specification.

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Definition – Standards	As the data table allows standards beyond Australian Standards to be captured (p24) (eg IEC standards) suggest this definition be expanded to something like: A standard published by a relevant Standards body.
Table 2 – Related Documents **Para 2.1.2., 2.1.3., 2.1.4.**	This table refers to the 'WEM DER <mark>Register</mark> Technical Specification' AGL notes that this title is inconsistent with the title of the Technical Specification currently published - the 'WEM DER Technical Specification – Feb 2021'.
2 DER Register	This section is titled the DER register but seems more concerned with the submission of information via the APIs, which is stated to be covered in the WEM DER Technical Specification. Suggest delete these paras.
4.1.2. – 4.1.5	This information again seems to be about the specifics of submitting information via the APIs, which is stated to be covered in the WEM DER Technical Specification. .Suggest delete these paras.
4.2.1	This paragraph seems to imply that local networks can modify the DER obligations contained within the WEM RULES. For consistency and long-term value and use of this information, AGL would expect that the only modification would be to extend the information gathered, not reduce the information gathered, although it is unclear what scope a network may have.
4.4.3	The clause is a bit lengthy and can be broken into sub-clauses for better clarity and separation of obligation: 4.4.3. If at any time a Network Operator becomes aware that: 　(a)　DER Generation information required from it under paragraph 4.1 has failed to be submitted, is incomplete, inaccurate, or no longer accurate; or 　(b)　within 20 Business Days (or such longer period as agreed with AEMO) of receiving a notification under paragraph 4.4.2 　the Network Operator must either: 　(~~a~~c)　re-confirm the accuracy of the DER Generation Information previously provided; or 　(~~b~~d)　submit new or updated DER Generation Information. to AEMO in accordance with this Procedure.
5 STORAGE	AGL considers that specifying how the data is stored is more appropriate for the WEM DER Technical Specification. Suggest relocating the following text 'the representational state transfer API architecture (rest) API architecture' to the Technical Procedure.

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6 Access to DER Register	AGL again notes that this section seems to technology specific, and too specific in the cross reference. AGL suggests: 6.1.1. Network Operators must register with AEMO to ~~use the API in accordance with~~ <u>access</u> the WEM DER Register ~~Technical Specification~~. 6.1.2. AEMO will provide access to DER Register ~~Information via the digital platform API~~ <u>in accordance with</u> ~~described in paragraph 2.1.2. and in the manner set out in~~ the WEM DER Register Technical Specification.
7.1.2.	Is the updating quarterly / 3 monthly cycle based on the commencement date of the DER register, or is that now calendar / FY quarterly ?
7.1.5	The use of the term 'sufficient numbers' seems unnecessary and the para seems to make the privacy principle an outcome rather than the objective. AGL proposes: <u>7.1.5 AEMO must maintain confidentiality and privacy and will therefore only publish such information as it reasonably determines will not breach this obligation.</u>
7.2.1.	This is a useful obligation, but it is unclear how, when or where such information will be published – ie in the DER report, forecasting reports, or scheduling information. Note similar issue to para 7.2.2.
7.2.2	It is unclear if the 'relevant information' published in the Statement of Opportunities meets the criteria of para 7.1, particularly in respect of privacy / confidentiality.
Appendix A	Figure 1 provides a representative data model, but this procedure may benefit from a single line diagram showing the connection point through to the various pieces of DER equipment and how that relates to the data model.
Appendix A **Information Level 1**	AGL notes that this clause indicates that records are stored against NMIs, however para 4.3 discusses the provision of DER information by **connection point**. Recognising that at present, this may not be relevant, but in the context of IESS and Multiple Trading Relationships (being discussed within the NEM where a connection point may have multiple NMIs) clarity of NMI versus connection point can become quite relevant.
Appendix A **Data Model 1**	The data model table has no table reference

Relevant Procedure Paragraph(s)	Comment
Appendix A **Data Model 1**	The data model table is designed on the basis that the information fields are known. If the network is aware of a NMI with DER equipment but does not have the necessary detailed information to fully complete the register, it seems that the way the data is structured, it is likely the NMI would not be registered. Is there a need or value in identifying NMIs where such connection exist, but where detailed data is unavailable at present, and thus identifying a need to engage with the customer.
Appendix A **Data Model 1**	As this is a procedure update to enhance the information provision, it is suggested that the Data Table field information could be enhanced by showing the number of characters per field: Eg NMI – Alpha-numeric to NMI – Alpha-numeric (10) With the (10) indicating the field length. This would apply across all fields shown in the register
Appendix A **Data Model 1** **Phases Available**	The number of phases available has been debated heavily in the NEM and the underlying question is whether this implies available wires or wires connected to the connection point. For example, a 2-phase premise may have a 3-phase service installed and wired to the metering point, but only two are connected. This field seems to be requiring the number of connected phases rather than available phases.
Appendix A **Data Model 2**	General comment. Some data elements have specific responses (enumerations) called out. Some of these are defined in the Description column, while others are described in the "Other" column. Suggest a general review of all elements to ensure that enumerations are clearly defined and clearly in the same column in all data tables.
Appendix A **Data Model 2** **DER Equipment Manufacturer**	AGL strongly supports the use of enumerations where possible, including Equipment Manufacturer as free text will invariably have variations.
Appendix A **Data Model 2** **DER Equipment Type**	The additional information column seems to indicate an enumerated list, but the enumerations are not clear from the list. AGL strongly supports the use of enumerations where possible, including Equipment Type.
Appendix A **Data Model 2** **Equipment Injection Capacity /** **Equipment Withdrawal Capacity**	AGL suggests that these fields should be either changed from Mandatory to R (Required – as in must be provided if available) as this field cannot be completed for controlled load, only injection equipment and vice versa for withdrawal equipment or that a value of '0' be allowed for these instances, rather than applying a logic test. The equipment type should be sufficient for any validation tests.

Relevant Procedure Paragraph(s)	Comment
Appendix A **Data Model 2** **Equipment Injection Capacity /** **Voltage / Frequency etc**	As above, AGL suggests that these fields should be either changed from Mandatory to R (Required – as in must be provided if available) or that a value of '0' be allowed for these instances where the information is not applicable, rather than applying a logic test on the basis that the equipment type should be sufficient for any validation tests.
Appendix A **Data Model 3**	As noted previously, AGL strongly supports the concept of information being enumerated (eg device type) to provide the best and consistent value from the database.
Appendix A **Data Model 3** **Number of devices**	AGL notes that this is provided as a multiplier, but cautions that this would only apply if the devices were identical, including capability and settings. Identical devices may have settings which allows different capacities which should be catered for.
Appendix A **Data Model 3** **Manufacturer / model, type etc**	AGL strongly supports enumeration of this information.