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?	In our opinion there should be no minimum. SA Power Networks currently requires all distributed generation connected to the network to be registered regardless of size. In our view it adds complexity and opportunity for confusion if additional rules apply to different sized installations.
2	Are standard, packaged reports also required for NSPs? If so, what information is required?	Reports to support the operational management of the DER database will be required ontop of the proposed reporting methods. For example, to summarise the number and type of erroneous records and exceptions.
3	What is the most effective means to communicate and inform key stakeholders on how to use the DER Register?	
	AEMO is considering the case of remote reading and changes to inverter settings by OEMs and is asking for stakeholder views on how this can be managed to ensure DER information integrity is maintained. For example, should DNSPs ensure that retail customers are made aware of the procedures for reporting any material changes to a DER installation, and	SA Power Networks believe sourcing inverter settings from OEMs may be an effective method to improve integrity of data however we believe provision and enforcement will be an issue. SA Power Networks has recently issued a consultation paper via the Clean Energy Council to OEMs to seek feedback on

	that inverter manufacturers are also aware of this and support their customers in meeting their contractual requirements?	region specific inverter settings as well as the availability and acceptability of remotely reading and changing inverter settings.
	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?	DNSPs should have access to input, edit, and correct any data fields they are responsible for. If DNSPs are to be held accountable for data placed in the register by other parties they should have the opportunity to make or suggest corrections to the data fields. The source of inputted data should also be available.
	How would DNSPs and installers wish to receive notifications?	
	Are there additional post-submission validation checks that would be of value in step 1.11?	

Draft DER register information guidelines

Section	Subsection	Issue	Suggestions
4.2 And Appendix F		Validation of information provided by installers and third parties	SA Power Networks wishes to raise concerns with the post-submission validation process. Specifically with the responsibility of resolving issues with data submitted by third parties. We believe it will be difficult and resource intensive to review and address issues with the data provided by third parties and installers , especially if they need to be manually contacted. SA Power Networks is open to discussions and suggestions on how this should be operationally mananged. SA Power Networks believe the following measures will give the best chance of success: - Make it simple, easy for the installers to comply (only have to enter a few fields for most standard equipment, consistent approach and standards across all jursidctions) - Validate upfront (e.g. online confirmation while on site, electronic registration etc.)

			- Ensure consistent settings to begin with (standardised pre-programmed settings) - Incentivise installers to provide accurate information (audits, avoid demerit points, reduced installer site visits to rectify, recommended installers programs etc.)