

# Stakeholder Feedback Template

This template has been developed to enable stakeholders to provide their feedback on the DER Register Information Guidelines Consultation Issues Paper. 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](mailto:DERRegister@aemo.com.au) by Thursday, 07 March 2019.

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Questions	Feedback
<b>Section 3.1 – Information requirements</b>	
1 Do you agree with the suggested format and method of data submission?	Yes. CitiPower Powercor supports the use of a CATS transaction and storing of the data in MSATS.
2 Are there adequate access arrangements for Installers and installation software providers to submit data on behalf of NSPs into the DER Register? If not, how might this be improved?	CitiPower Powercor seeks clarification on whether the information the Installer or Installation Software Provider is submitting is only the data where they are nominated as the data source/provider in the Data Model levels 3&4 (Appendix B of the consultation paper) or also where the NSP is listed as the data source/provider?  It is our preferred position that the NSP is the only participant that submits data where the NSP is the data source/provider and the Installer submits data directly to AEMO where they are identified as the data source/provider.  In the interest of providing a good customer experience CitiPower Powercor would also be supportive of providing the Installer related information, provided to us in the alteration process, but would not be able to guarantee accuracy or ensure completeness in all instances.
3 Are there any risks associated with the different submission frequency between the <i>DER generation information</i> and <i>DSP information</i> ?	CitiPower Powercor has not identified any risks with different submission frequencies.
4 What is an alternate approach to the frequency of data submission?	CitiPower Powercor has not identified an alternate approach.

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	How would this be implemented?	
5	Are there any other relevant issues that have not been considered?	CitiPower Powercor has not identified any other issues.
<b>Section 3.2 – DER register storage</b>		
1	Are there any issues associated with the separate storage of <i>DSP information</i> and <i>DER generation information</i> ?	CitiPower Powercor supports the separate storage of the DER and DSP information.
2	Are there any other relevant issues that have not been considered?	CitiPower Powercor has not identified any other issues.
<b>Section 3.3 – DER register information access to NSPs</b>		
1	What <i>regulatory obligations or requirement</i> do NSPs intend to use DER register data for?	CitiPower Powercor has not identified any regulatory obligations for use of the DER Register. We intend to use the DER register for safety and demand management purposes.
2	Do you have a preferred process for accessing <i>DER register information</i> ?	CitiPower Powercor would prefer to use an API to develop custom reports. The reports would utilise all information about each DER installation.
2a	Is existing NMI discovery (adding in DER) useful?	CitiPower Powercor does not believe the NMI discovery process would be useful as this only gives a view of 1 NMI at a time.
2b	Are existing C1, C4 and C7 reports (including DER) suitable? Is an additional report required? If a new report is required, what should it include?	CitiPower Powercor believes these reports could be an option but would prefer to use the API to develop its own reports.
2c	What are your views on using an API to develop custom reports?	This is our preferred option
3	Do existing C1, C4 and C7 reports need to be provided if an API is provided?	CitiPower Powercor does not see a need for these reports to be provided if an API is provided.
4	Are there any other relevant issues that have not been considered?	CitiPower Powercor has not identified any other issues.
<b>Section 3.4 – AEMO reporting and publication</b>		
1	Are there additional variables that should be published in the <i>DER register report</i> (see Appendix B for list of data)? Why?	At this time CitiPower Powercor has not identified any additional variables that should be published in the DER Register.
2	Is aggregation at the post code level suitable? If not, what is an appropriate aggregation variable and why?	CitiPower Powercor is supportive of aggregation at a post code level.

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<b>3</b> Do you agree with monthly updating of the <i>DER register report</i> ? Why/ why not?	CitiPower Powercor does not currently have a view on the frequency of when this report would be published. At this time we have not identified any use for this report.
<b>4</b> Are there any other relevant issues that have not been considered?	CitiPower Powercor has not identified any other issues.
<b>Section 4.0 – Proposed Data</b>	
<b>1a</b> What are the costs and impacts of AEMO’s proposed data requirements? Please break down and describe the costs based on: Upfront once-only costs vs ongoing costs	At this early stage of the consultation and start-up of CitiPower Powercor’s project to implement these changes we believe the costs to be substantial. The bulk of these costs will be once only capital expenditure and we will have some ongoing operational expenditure for data management, system maintenance and any future enhancements.
<b>1b</b> What are the costs and impacts of AEMO’s proposed data requirements? Please break down and describe the costs based on: Separation of internal labour costs, contracted labour, system improvement	At this early stage of the consultation and start-up of CitiPower Powercor’s project we don’t have this level of granularity.
<b>2</b> Do you agree with the proposed data requirements? Why/ why not?	CitiPower Powercor agrees with the data requirements where the NSP is listed as the data source/provider. As stated previously we support only the NSP supplying to AEMO the NSP nominated information and the Installer submitting directly to AEMO the other data characteristics.  In the interest of providing a good customer experience CitiPower Powercor would also be supportive of providing the Installer related information but would not be able to guarantee accuracy or ensure completeness in all instances.
<b>3</b> Do you agree with the proposed data structure (see appendix B, figure 3)? If not, please explain why it would not work and propose an alternative.	CitiPower Powercor agrees with the proposed data structure.  We also strongly recommend that where the data source is based on the model or manufacturer details this data is pre-populated in MSATS on submission of a particular characteristic, i.e. Inverter Manufacturer/Model Number.
<b>4</b> Should data variables that have default values prescribed by the AS4777 standards (e.g. Under-frequency protection, Over-frequency protection, Undervoltage protection, Overvoltage protection, etc) be	CitiPower Powercor strongly recommends these be provided as discrete inputs as it simplifies the current and any potential future system changes required.

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requested as discrete inputs? Why/ why not?	
<b>5</b> For the AC connection table (appendix B), is it relevant to include protection modes for non-inverter DER? If so, what is the relevant information that should be captured?	CitiPower Powercor believes it is relevant to include protection modes for non-inverter DER. Relevant information to be captured should include: ROCOF, anti-island, inter trip scheme, export limiter/prevention, volt/var control and power factor control.
<b>6</b> Do you agree with the data source/ providers for the physical collection, listed in Appendix B? If not, explain why and who else or what other data sources should be involved.	CitiPower Powercor agrees with all bar the 'Non-inverter generator – voltage/reactive power regulation' Data Model Level 3 – AC Connection as we don't collect this information.
<b>7</b> Are there any other requirements that have not been considered? Why are these important? Which table are they relevant to?	CitiPower Powercor believes there should be consideration for the integration of remote monitoring of invertors as a future state requirement. We see this as a common platform to share this information between participants.
<b>8</b> In terms of the examples given, are their other DER installation configurations that AEMO should consider?	CitiPower Powercor has not identified any other installation configurations to be captured.
<b>9</b>  Are there any other relevant issues that have not been considered?	<p>In the data model, there are a number of unique identifiers (DERID in Data Model level 2, AC Connection ID in Data Model level 3, Device ID in Data Model level 4) for which the tables suggest that AEMO will be the data source/provider. CitiPower Powercor seeks clarification how this information be provided or accessed by the NSP?</p> <p>CitiPower Powercor recommends that these unique identifiers be created and provided to AEMO by the NSP when they create, modify or de-commission DER information in their systems. This is because any changes to a DER needs to be uniquely identified in the CR so that AEMO changes the correct information (e.g. for a site where there are 2 solar installations at the NMI, the NSP would need to uniquely inform AEMO which of the solar installations the CR is changing).</p>
	In the Description column of the Export Limit field it states 'Exceeding this limit will require the installation to disconnect'. Can you please confirm which jurisdictional instrument supports this?
	CitiPower Powercor would like to highlight that the collection of data should not be onerous and not slow down the approval and installation of DERs. It

Questions		Feedback
		also should not lead to delays for customers if not all information is provided, i.e. if Installer specified information is not provided to the NSP in a timely manner.
General Comments		
1	Do you have any other comments?	<p>CitiPower Powercor would like to highlight the quality and accuracy of information is only as good as that provided to us by customers. We perform minimal validation on the data provided to us other than checking and confirming capacity limits on the network and making sure it's an approved inverter.</p> <p>We have had examples of customers applying for a particular limit only to find they have installed more and other instances where customers have not applied or advised us at all and subsequently installed PV.</p>
		CitiPower Powercor would also like to highlight that when providing existing DER information on or before 1 <sup>st</sup> December we cannot guarantee all data that will be expected after 1 <sup>st</sup> December will be available for these existing DER installations.
		If there is an amendment to an existing DER, for example a customer expands the installed solar capacity from 3kW to 5kW. Will we be expected to provide a change request with an updated export limit of 5kW or an increase of 2kW. CitiPower Powercor recommends that the new export limit rather than the increment is provided.