- 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 by Thursday, 07 March 2019.

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Questions		Feedback
Section 3.1 – Information requirements		
1	Do you agree with the suggested format and method of data submission?	
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?	Energy Networks Australia (ENA) has published a set of National Connection Guidelines which aim to harmonise the requirements of distributor connection policies. Ideally, and for minimal consumer impact, we recommend that the information requested, and terminology used, are consistent with information requirements placed on distributors under DER Guidelines.
3	Are there any risks associated with the different submission frequency between the *DER generation information* and *DSP information*?	
4	What is an alternate approach to the frequency of data submission? How would this be implemented?	
5	Are there any other relevant issues that have not been considered?	
Section 3.2 – DER register storage		

Questions		Feedback
1	Are there any issues associated with the separate storage of *DSP information* and *DER generation information*?	If increasing the number data tables in MSATS is pursued as an option, this is likely to require system and schema upgrades. If needed, it should be clarified if a schema upgrade is mandatory for all participants and whether AEMO will maintain backward schema compatibility. More generally, we request AEMO undertake an early assessment and advise participants of any schema changes needed, with consideration of timing impacts on other regulatory changes.
2	Are there any other relevant issues that have not been considered?	
Section 3.3 – DER register information access to NSPs		
1	What *regulatory obligations or requirement* do NSPs intend to use DER register data for?	
2	Do you have a preferred process for accessing *DER register information*?	
2a	Is existing NMI discovery (adding in DER) useful?	
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?	
2c	What are your views on using an API to develop custom reports?	
3	Do existing C1, C4 and C7 reports need to be provided if an API is provided?	
4	Are there any other relevant issues that have not been considered?	
Section 3.4 – AEMO reporting and publication		
1	Are there additional variables that should be published in the *DER register report* (see Appendix B for list of data)? Why?	
2	Is aggregation at the post code level suitable? If not, what is an appropriate aggregation variable and why?	Aggregation at postcode level is insufficient for understanding congestion within the network. Network congestion could vary within a postcode

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		depending on the network topology and how distribution feeders and transformers are set up within that geographical postcode. We recommend aggregation of capacity at the transformer or feeder level. This will enable retailers to identify opportunities to help customers and the network better.
3	Do you agree with monthly updating of the *DER register report*? Why/ why not?	
4	Are there any other relevant issues that have not been considered?	
Section 4.0 – Proposed Data		
1a	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	
1b	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	
2	Do you agree with the proposed data requirements? Why/ why not?	
3	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.	
4	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 requested as discrete inputs? Why/ why not?	
5	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?	

Questions		Feedback
6	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.	
7	Are there any other requirements that have not been considered? Why are these important? Which table are they relevant to?	
8	In terms of the examples given, are their other DER installation configurations that AEMO should consider?	
9	Are there any other relevant issues that have not been considered?	Holistic consideration should be given to incentivising data quality in the register so it is useful for all users.
General Comments		
1	Do you have any other comments?	It should also be clarified if retailers are able to access the DER Register (for NMIs for which the retailer is the FRMP for) or if there is any future intention, and in what circumstances these would be allowed; and whether this should be future-proofed into design of the register.