

18 April 2019

Audrey Zibelman
Chief Executive Officer
Australian Energy Market Operator
Level 22, 530 Collins Street
Melbourne VIC 3000

Via email: DERRegister@aemo.com.au

Dear Ms Zibelman,

RE: Distributed Energy Resources Information Guidelines – Draft Guidelines

TasNetworks welcomes the opportunity to make a submission to the Australian Energy Market Operator (**AEMO**) on the Draft Distributed Energy Resources (**DER**) Information Guidelines Consultation Paper.

As the Transmission Network Service Provider (**TNSP**), Distribution Network Service Provider (**DNSP**) and jurisdictional planner in Tasmania, TasNetworks is focused on delivering safe and reliable electricity network services while achieving the lowest sustainable prices for Tasmanian customers. This requires the prudent, safe and efficient management and development of the Tasmanian power system. In this regard, TasNetworks is supportive of AEMO's efforts to clarify and improve the collection and provision of DER information.

Collection Process

AEMO has proposed that information must be submitted to the DER Register no later than 20 business days following the date of installation, change or decommission. TasNetworks considers this a prudent timeframe that strikes an appropriate balance between the need for up to date information and recognition of the challenges that can arise throughout the DER installation process. However, TasNetworks notes that, as presented, the collection process diagram does not accurately represent every element, or the order of each step, involved with the collection process in Tasmania. As one example, a National Meter Identifier (**NMI**) is not assigned until an Electrical Works Request (**EWR**) has been completed. As long as there is sufficient recognition and flexibility in the collection process to handle differing regional processes, and ordering thereof, TasNetworks considers that the 20 day timeframe should be sufficient to allow upload to the register of relevant DER information.

This assessment is, however, predicated on AEMO's stated intention to use a combination of web-interface and smart app for data collection along with the use of pre-populated and auto populated fields sourced from existing databases and standards where possible. Anything that can reduce the administrative burden for installers and Network Service Providers (**NSP**) is only likely to lead to more

accurate and timely provision of DER information. Conversely, lacking such automation, the risk is that the value of information submitted to the register is reduced through inaccuracy and/or incompleteness. In this regard, it should be noted that NSPs will not have the ability, nor the resources, to be able to verify that information from these external sources are accurate.

Beyond this electronic assistance, TasNetworks notes that there will be little incentive for installers to accurately record DER information in all cases. TasNetworks is aware that some jurisdictions are proposing to refuse connections unless a certificate of safety compliance is completed which would increase the compliance requirement on installers. However, there is no such leverage available in Tasmania at this time. TasNetworks therefore suggests that AEMO continue to work with electrical safety governing bodies to implement a national requirement for DER Register compliance.

Beyond these considerations, TasNetworks notes that changes to deemed connection contracts may be required to facilitate the collection of DER information. In some cases, this may require AER approval. If so, and there are many NSPs in the same situation, an expedited process to secure such approval might be considered to ensure compliance with the DER Register implementation timetable.

Data Model

TasNetworks supports the reductions in the data model hierarchy from four to three levels. TasNetworks also supports the reduction in the fields for collection and the use of pre-populated and auto-populated fields as much as possible. TasNetworks considers these changes will reduce administrative burden and model complexity which should lead to a more efficient DER collection process and more useful DER register.

In a similar fashion, TasNetworks considers that NSPs should have the ability to designate which fields are editable and which are read only. As highlighted above, each jurisdiction can have different processes and regional characteristics which may necessitate different treatment in how each field is used. Adopting a centralised, one size fits all approach would limit such flexibility and could lead to delays or inaccuracies in information provision, which would reduce the benefits to the DER Register.

Reporting

TasNetworks considers the format of the aggregated, regional DER Register report is appropriate. However, TasNetworks contends the information contained within it might be supplemented to align with the Australian Energy Regulator's Regulatory Information Notice (**RIN**) requirements on DER. In this manner, duplication in regulatory reporting and costs to customers could be minimised.

TasNetworks agrees with AEMO that pre-packaged NSP reports would also be useful. In this respect, allowing each network to customise report outputs for their own needs would seem to promote the maximum reporting value to be extracted.

Existing DER Data

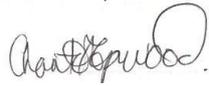
Under clause 3.7E of the National Electricity Rules (**NER**), NSPs must provide existing DER generation information to AEMO by no later than 1 December 2019. TasNetworks notes that the Draft DER Guidelines specify that this must be in a manner agreed between the NSP and AEMO. Although TasNetworks will make every endeavour to provide as fulsome and accurate information as possible, it must be recognised that current information on DER in Tasmania is both scant and may not reflect any modifications or amendments made since original installation.

In order to provide better value to users of the DER Register, TasNetworks suggests that initial data be flagged as such so that users can take this into account when making decisions based on DER Register information. In terms of aggregated reports this might be reflected in a ratio that quantifies

the number of initial DER installations to total DER installations. If new information on these initial installations comes to light at a subsequent time, perhaps from a visit by an electrical works inspector or contractor, then the flag could be removed reflecting the updated nature of the information held on the installation.

TasNetworks would welcome the opportunity to discuss this submission further with you. Should you have any questions, please contact Tim Astley, Team Leader NEM Strategy and Compliance, via email (tim.astley@tasnetworks.com.au) or by phone on (03) 6271 6151.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chantal Hopwood'.

Chantal Hopwood,
Leader Regulation