

MINUTES – DER REGISTER DELIVERY TEAM 2 MEETING

MEETING: DER Register – Delivery Team 2 (Process Design) Meeting
 DATE: Monday, 6 May 2019
 TIME: 2.00 – 4.00pm (AEDT)
 LOCATION: Webex (dial in)

ATTENDEES:

NAME	COMPANY / DEPARTMENT
Anubhav Berry	Bridge Select / kickstart agile
Rob Cahill	Energy Queensland
John Dalgliesh	Solar Scope
Jared Green	FormBay Trading Pty Ltd
Roy Kaplan	AEMO
Anthony Kavaliauskas	Endeavour Energy
James Patterson	Clean Energy Council
Robert Simpson	Ausgrid
Kevin Smith	Ausgrid
Jaz Singh	Formbay
Daniel Sullivan	FormBay Trading Pty Ltd
Luke Barlow	AEMO
Gurinder Singh	AEMO
Lisa Forden	AusNet Services
Annie Macdonald	Endeavour Energy
Tan Bui	Jemena
Leah Bonshek	Jemena
Greg Szot	Powercor

(note: best efforts were made to compile a complete attendee list, however some dial in attendees may have been omitted)

1. Agenda

1. Welcome and Introductions
2. Update on project
3. Summary of stakeholder engagement
4. Actors
5. Draft collection process
6. Data validation and integrity
7. Next steps

2. Action Items

ITEM	ITEM	RESPONSIBLE	DUE
1	AEMO to arrange follow up meeting in Week of 20 May	AEMO	11 May
2	NSPs and other attendees to provide feedback on proposed definition of 'installation date'	All	17 May
3	NSPs to advise on the adequacy of the 20-business day period and proposed alternatives	NSP	17 May
4	AEMO to clarify direction on user accreditation to access the DER Register	AEMO	Next meeting

ITEM	ITEM	RESPONSIBLE	DUE
5	AEMO to clarify post-submission validation checks that will be in place at implementation	AEMO	Next meeting

3. Notes

3.1 Welcomes and Introduction

- Noted that AEMO has received submissions to the draft guidelines and report. Objective of this meeting is to work through key issues and discuss to ensure AEMO has clear understanding.
- Acknowledged terms of reference.
- No additional agenda items raised.
- Submission available on [AEMOs website](#).

3.2 Background (slides 3–4)

- AEMO notes the rule change and reiterated the obligations it placed on parties.

3.3 Summary of stakeholder engagement (slides 6–10)

- AEMO ran through feedback and noted the details and initial views are for discussion in this meeting.

3.4 Actors (slides 12–13)

- AEMO provided overview of the accountabilities of related parties.
- Discussion on compliance (slide 13), raised by some NSP representatives:
 - The additional overheads created by the register because NSPs would be obliged to pursue installers to provide data / resolve issues.
 - Manual handling of exceptions would be too burdensome on NSPs.
 - Compliance regimes need to be as efficient as possible.
 - Review of every DER Record (even if no exceptions) is needed to have confidence regulatory obligations are being met.
- CEC noted that they have capabilities to provide a compliance service to support NSPs.
- DER Register should manage scenarios where a business has required an installer to install non-approved DER equipment.
- NSPs noted that the collection process needs to consider and assimilate with DER approval and connection processes. Concern raised that it appears more like AEMO is imposing new constraints that don't integrate well.
- AEMO noted that the process proposed does not have to be used. AEMO will provide an API that enables NSPs to submit the data directly, where this is gathered through their own processes.

3.5 Draft collection processes (slides 15–19)

- AEMO noted that the process diagram has not been changed at this stage.
- AEMO walked through the various examples of DER approval and connection and how NSPs and installers will be expected to access the DER Register.
- AEMO noted that in cases where NSPs are submitting directly to the DER Register they will be accountable for notifying installers that the record has been confirmed by the NSP.
- AEMO sought feedback on proposed definition of 'installation date'.
 - No feedback on the 20-business-day timeframe, but the installation date requires consideration as this can be quite unreliable.
 - Discussion on additional notifications identified that this is challenging as there is no one in AEMO's systems to notify.
- Discussion on the date of automatic submission where the initial approved DER record is not edited:

- Various views from NSPs on this and the background. General perspective is that 12 months is acceptable.
- View by some NSPs that automatic deletion is preferred. AEMO noted that deletion by design is not ideal and NSPs should be making this decision.
- Preference is that a 'dashboard' shows the status and age of every record to support this decision and allow NSPs to define the timing if this is needed.
- Level of access of users for the DER Register
 - NSPs raised concern that there is a gap in understanding of their ability to pursue installers for compliance deficiencies.
 - Some NSPs requested that only 'CEC accredited installers' are permitted to access the DER Register.
 - AEMO noted that users of the register cannot be restricted to CEC accredited installers as not all these users need to have this accreditation under the Renewable Energy Target legislation, National Electricity Rules or any other legislative, or regulatory instrument.
 - Some NSPs view this as inadequate as the CEC accreditation is the only avenue they have to pursue non-compliance concerns. The only other avenue is state safety bodies, but their role may be restricted as this is not clearly a 'safety' issue, and that breaching safety regulations may be the only thing that affects electrical trades licences.
 - AEMO was requested to include a requirement for CEC accreditation in the Information Guidelines. AEMO noted that NSPs can include that same requirement in their connection agreements, and since CEC has not regulatory role under the NER there is no scope for AEMO to do so.
 - NSPs rely on CEC demerit point system for compliance. AEMO noted that even if this avenue was pursued this it would likely jeopardise the implementation timeline. CEC noted that they can onboard 'installers' quickly and are prepared to take on this role beyond the STC scheme.
 - NSPs reiterated again that there is no broad compliance regime they can rely on. Their relationship is with the customer, not the installer. Recourse is to withhold customer request to energise. This can be communicated in the connection application process, offer to connect etc. But these broad challenges with compliance should be considered collectively, the DER Register is an opportunity to do so.
 - Consider the role of validation in AEMO's systems to check against CEC accreditation identities. CEC noted that access to an API could be provided for AEMO to do this, with consideration of access limitations based on preferences. Application providers could also have a role here.
 - NSPs are seeking confirmation on the direction AEMO will take to ensure their updated model standing offers are consistent.

3.6 Validation and Integrity (slides 21–24)

- AEMO noted the intent for editing rights and visibility of DER data.
- Discussion on post-submission validation
 - NSPs concerned that they don't have visibility of what would be checked here and whether it would increase the burden on them for exception handling. AEMO acknowledged and will clarify.
 - Feedback that these checks should be limited to a security and reliability perspective.
 - AEMO requested more information on how OEM databases may be accessed.
- Installer training and communications
 - CEC noted that they can support this when needed, and tailor to specific NSP needs.

4. Next Steps (slide 26)

- Next meeting proposed for week of 20 May.

The meeting closed at 4.10pm.