



Clean Energy Council submission to the Australian Energy Market Operator

Distributed Energy Resources Register

Executive Summary

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback on the issues paper on the Distributed Energy Resources (DER) Register Information Guidelines. Our primary focus is with respect to the proposed data collection process and the red tape burden it could add to DER installers.

The CEC is the peak body for the clean energy industry in Australia. We represent and work with hundreds of leading businesses operating in solar, wind, hydro, bioenergy, marine and geothermal energy, energy storage and energy efficiency along with more than 6,000 solar installers. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

The CEC supports the establishment of a DER Register that will assist the Australian Energy Market Operator (AEMO) to ensure system security and allow efficient operation of the National Electricity Market (NEM) into the future. We welcome the opportunity for the CEC data on inverter capabilities to be utilised for the DER Register.

The AEMO proposal for the role of the installer in data collection diverges from the intent of the Australian Energy Market Commission (AEMC) rule change that no additional or modified obligations would be placed on customers or parties other than NSPs.

We are very concerned the data collection process will create a significant additional administrative burden for DER installers.

We call on AEMO to utilise the procedure envisaged by the original AEMC rule change, whereby NSPs have responsibility for providing data to the AEMO DER Register. If an NSP is unable to support this approach, then AEMO should assume responsibility for its role in data collection (and possibly related aspects of grid connection approval) in the interests of rapidly improving the data management process and modernising our electricity systems.

We would be very happy to discuss these issues in further detail with the AEMO. We look forward to contributing further to this important initiative.

AEMO's proposed approach to data collection diverges from the AEMC rule change

The DER Register arose out of changes to the National Electricity Rules in late 2018. In making its decision the AEMC's intent was for an outcome that resulted in "...no additional or modified obligations [] placed on customers or parties other than NSPs".

The data collection process proposed will place additional reporting obligations on DER installers, contrary to the stated intent of the AEMC rule change.

Collect information once

The design of the data collection process must ensure that data will only be entered once by a single point of contact, and this should be the NSP. If the NSP is unable to support this approach, then AEMO should take over responsibility for its role in data collection (and possibly some related aspects of grid connection approval) in the interests of rapidly modernising our electricity systems.

Where DER installers are required to submit information, the likelihood of poor, incorrect or incomplete data is very high. This is particularly the case for DER assets like storage where there is no incentive attached to the reporting. Without an incentive to undertake the detailed administrative work required, reporting compliance by installers is likely to be low.

To the extent that the process requires manual rework by installers or is frustrated by a lack of integration between NSPs and AEMO (resulting in delays) it will likely fall short of what the Rule intended and result in DER installers incurring additional cost or risk to the quality of the information provided.

Further streamlining is needed

The proposed data collection process risks requiring DER installers or other parties to enter data twice. Inherent within the AEMC's final rule is an expectation that processes will be streamlined between NSP and AEMO such that information requirements are only entered once, are not duplicated and do not add onerous obligations on customers, DER installers or other parties.

AEMO's indicative high-level data flow process makes it clear that the success of AEMO's register is dependent on the extent to which NSPs and AEMO can streamline the process for information gathering, remove duplication and avoid additional obligations on installers.

Data submission by installers should be streamlined into a single reporting procedure, implemented by AEMO, NSPs, Clean Energy Regulator (CER), the CEC, inverter manufacturers and others, working collaboratively to avoid duplication of paperwork.

Push the onus of verification up the product chain

AEMO's data requirements are extensive and overlap with other information requirements. The vast majority of the information is product-, manufacturer-, network- and supplier-specific. Installers will not have the necessary technical information for the products they are installing and will need to source it from these parties.

Instead of placing the onus of data entry on installers, information sourcing should be pushed toward NSPs, product manufacturers and suppliers. The aim should be to streamline data collection at the point of installation into a single, highly automated procedure. The role of installers can therefore be limited to high level installation specifications and verification. DER installers, meter installers and inspectors should be checking the data is correct and adjusting accordingly rather than entering the data.

The CER's Solar Panel Validation Initiative is an efficient data collection process and its suitability for the DER Register should be considered. The Solar Panel Validation Initiative already covers about 60% of the market. There are three app developers and others are planning to come on board. The apps already collect a range of information and are not just limited to serial numbers. This initiative along with the provision of data submission end points and API services by AEMO to other third-party app

providers (with appropriate legal and privacy controls) could considerably increase the quality and range of data submitted to the DER and ease the burden of data entry for installers.

We acknowledge and welcome AEMO's interest in utilising data held by the CEC, in the interests of avoiding duplication and reducing the administrative burden on installers. The process to utilise existing data collection by the Clean Energy Regulator (CER) is not adequately considered in the Issues Paper. We would encourage AEMO demonstrate how it intends to leverage off the success of the CER and integrate it into the NSP and AEMO data collection processes.

Opportunities for additional improvements

The recent release of the Energy Networks Australia (ENA) National Connection Guidelines provides an opportunity to create a nationally streamlined process for information gathering and data entry, meeting the needs of AEMO and the NSPs. Integration of NSP grid connection approval processes within AEMO's DER Register would have considerable potential for reducing administrative burden. It would also have the significant benefit of improving access to information about the grid connection rules, which is difficult and time-consuming for companies or installers to collect and maintain. Individual NSP requirements that differ from the standard requirements of AS4777 and the ENA National Connection Guidelines should be provided by the NSP into the DER Register.

AEMO has not given enough consideration to working with manufacturers to obtain data. Data provision by product manufacturers could replace most, if not all, of the data that might otherwise be required from an installer. Most inverter manufacturers now have cloud-based platforms and could provide AEMO with extensive and detailed data on their cloud-enabled fleet. AEMO should allow eligible cloud-enabled inverters to be exempt from the requirement for installer-based data collection if the manufacturer has agreement with customers and AEMO to provide the data required for the DER Register. Inverters with the capability of remote data acquisition render AEMO's proposed manual data collection process obsolete.

AEMO is already developing an API for use in Virtual Power Plant (VPP) trials. The use of live inverter data lends itself to the development of a dynamic register. This would be a far more useful approach than a static register that relies on manual reporting by installers. The AEMO work on VPP trials should be aligned with the work of the AEMO DER Register.