

24 January 2023

Australian Energy Market Operator
45/152 St Georges Terrace
PERTH WA 6000

Via email: wa.marketdevelopment@aemo.com.au

RESPONSE TO PROPOSED CHANGE TO WEM PRECEDURE: DER REGISTER INFORMATION PROCEDURE

Thank you for the opportunity to comment on AEMO's proposed change to *WEM Procedure – DER Register Information (WEM Procedure Change)*.

Synergy is generally supportive and as a key collaborator on the *EV Action Plan* is committed to ensuring its timely delivery.

Synergy understands that work by the Distributed System Operator (DSO) and AEMO in its role as Distributed Market Operator (DMO) is already well advanced to determine how DER data may be obtained and shared to the DER Register. As sole aggregator for non-contestable customers in the SWIS, Synergy will have a substantial role to play in this process, primarily through its interaction with the DSO. Synergy has not yet been engaged on the matter of DER data sharing with the DSO and as such is unclear of any associated technical requirements or expectations. This lack of clarity is evident in the case of new loads that do not have an existing DSO application process, such as electric vehicle supply equipment (EVSE).

Similarly, there are challenges in current data exchange processes between Synergy and the DSO that will impact the quality of the DER Register if not addressed. For example, misalignment in key definitions means there is likely a difference in how system capacity is calculated between organisations. There is also no process to have data that has been updated in Synergy's system reflected in the DSO's system.

Further, Synergy considers that any obligations for data provision and ongoing data availability should not be overly onerous so that the costs of these requirements exceed the benefits. Similarly, to ensure alignment with the WEM Objectives, requirements for DER assets and Virtual Power Plants must not exceed those that apply to other Facility types.

Given these areas of uncertainty and lack of clarity, Synergy considers that the proposed procedure commencement date of 2 October 2023 is not achievable. Synergy welcomes the opportunity to work with AEMO and the DSO further on DER visibility and data capture. This will help Synergy gain further clarity on its role and any expectations to support the implementation of the proposed WEM procedure changes in an appropriate timeframe.

Sincerely

A handwritten signature in black ink, appearing to read "Justin Ashley".

JUSTIN ASHLEY
ACTING HEAD OF STRATEGY, POLICY & SOCIAL VALUE