

24 April 2019

To: DERregister@aemo.com.au

RE: CEC submission to AEMO on DER Register

Executive Summary

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback on AEMO's proposed DER Register.

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.

CEC has previously submitted comments during round 1 of AEMO's consultation, so will not restate those points here. The current submission assumes that the DER Register is proceeding and seeks to explore issues related to effective implementation.

AEMO's proposal requires NSPs to be responsible for ensuring installers input correct DER data into the AEMO database. This proposal has a number of points of potential failure. CEC is committed to the goals of the DER Register and if it is to proceed, we would like its implementation to be effective and painless for installers. To this end, CEC has developed potential solutions to each failure point, and has consulted heavily with NSPs to create an agreed way forward.

Specifically, we would like to draw attention to two potential failure points related to compliance and installer identification and put forward real-world options to resolve the issues.

Compliance

Without a strong compliance framework, installers are unlikely to comply with AEMO's data entry requirements. NSPs have no natural compliance levers, nor is compliance something that NSPs are set up to do.

CEC, as the industry's self-regulatory entity, has a strong pre-existing compliance framework within which Accredited Installers and Accredited Designers operate. CEC's accreditation framework operates nationwide, is enshrined in legislation and covers electrical safety, worker safety and consumer protection. **No other government or non-government regulator has such a compliance framework.**

CEC has liaised with NSPs around Australia and there is a general view that they wish to use the CEC's existing Accreditation compliance framework.

Therefore, CEC encourages AEMO to work constructively together to support the effective incorporation of CEC's Accreditation compliance framework into AEMO's rules.

Identification

AEMO intends to require users to log in using a unique identifier. AEMO also intends for the system to be useable by electricians and non-electricians.

The only nationally recognised identifier that covers both electricians and non-electricians is CEC's existing Accredited Installer and Accredited Designer identification system. CEC's Accreditation system is currently mandatory for designers & installers of systems under 100kW, and further covers the large majority of designers & installers of larger systems. If CEC's identification system is adopted by AEMO, it would be a relatively simple matter for CEC to formally expand its accreditation system to include, for example, engineers, data managers, or other parties who would need to access AEMO's Register.

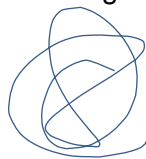
Given this, there I support by a number of NSP for use of CEC's identification system for the purpose of authentication & DER Register access.

As stated above, it is the collective view of the CEC, NSPs and also common sense that a meaningful compliance scheme is necessary if the data collected through the DER Register is to have any value. As a matter of natural justice, any compliance scheme must be delivered with maximum efficiency and minimum burden upon duty holders.

The CEC is currently undertaking an internal program of work regarding the transformation of its digital and data systems to better support its compliance functions and regulatory partnerships. Given that AEMO's database will be made available for input and output by third parties, the CEC envisages that it's compliance and administration platform will ideally integrate with AEMO's database to provide an efficient and easy to use compliance solution for installers, inspectors and NSPs.

The CEC looks forward to discussing the above matters further with AEMO.

Kind regards,

A handwritten signature in blue ink, consisting of several overlapping loops and curves, representing the name Georgie Smith.

Georgie Smith
EXECUTIVE GENERAL MANAGER
INDUSTRY INTEGRITY