Stakeholder Feedback - Jemena

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Draft DER register information guidelines

Section	Subsection	Issue	Suggestions
4	4.1 Data collection	Our primary concern with the Data Collection process as it is currently drafted, is that the NSP has no recourse with the Installer if missing or erroneous data is submitted directly to AEMO's DERR.	Jemena's strong preference is that the NSP submits all data to the AEMO DERR and can manage the collection of data from Installer through the connection process (as per NER Chapter 5a). This is our recommended option. • This is to proactively manage the quality of DERR data – rather than reactively manage by exception (Task 1.14). This would leverage Jemena's existing connection application process, systems and responsibilities. • Under the Rules, it is NSPs that are obligated to provide DER information to AEMO. Having the installer provide data directly to AEMO, without obligation, and without direct involvement of the NSP undermines the NSP's obligation to fulfil the above. • This approach lends itself well to Basic connections where the installation has already been performed prior to initation of the NSP connection process. It is unlikely the installation will change once the connection application completes. • For Negotiated connections, accuracy of the 'as-installed' details would be validated against the 'as-offered' settings outlined in the connection offer, through the commissioning report process, and updates (inc. the update to 'active' status') published to the DERR.

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			Alternatively, the CEC has suggested development of a digital solution to facilitate the collection of quality data from installers, using their accreditation scheme to incentivise and penalise them. Jemena are in principle in support of CEC's proposal.
4	4.1 Data collection	Jemena has significant concerns on the uplift in operational effort required to manage exceptions (Task 1.14). The additional cost of high volumes of exceptions, or an onerous resolution process would be passed onto the customer.	Need clarity on the obligation on the NSPs for follow up and resolution. What are the SLA, or expectations on exception data management? We see the NSPs obligation fulfilled in task 1.4, any additional effort to validate any exceptions are above and beyond the scope of what is required. Given that, without a strong compliance framework, installers are unlikely to meet data entry requirements, Jemena endorse the use of the Clean Energy Council's existing Accredited Installer compliance framework. Given that a compliance scheme is necessary, we believe the scheme should be delivered with maximum efficiency and minimum burden. AEMO's database will be made available for input and output by third parties and therefore we endorse the Clean Energy Council to develop a digital solution that integrates with AEMO's database to provide an efficient and easy to use interface for installers, inspectors and NSPs.
4	4.1 Data collection	During first round consultation, stakeholders have provided a view that installers do not have incentive to provide accurate DER information. Jemena agrees and believes this could lead to increased volumes of exception handling for NSPs (specifically the case where they don't or partially submit, or flag fields for exception).	AEMO has indicated this can be managed through accredited installers and changes to model standing offers. Given this positon, AEMO must clearly set out a formal process to rescind accreditation where installers do not meet their role/obligation to collect the requisite DER information as it would re-inforce installer behaviours.
4	4.1 Data collection	Jemena agrees with use of default values and standard databases to auto-populated DER information.	If NSPs are required to provide default connection parameters, further details are required on how these will be agreed, set and maintained.

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		Will the NSP be required to provide default connection parameters, or will these be set by AEMO? CEC?	NSP's should have control of which fields are mandatory and editable for each installation (case by case basis). This further reinforces the need for NSPs to manage the submission of installation data to AEMO.
4	4.2 Existing DER generation information	Jemena currently has gaps in the existing dataset for historic connections. What is the expectation/method for approving exceptions to the DER data model?	It would be cost prohibitive to contact/visit customer sites to collect the requisite data. We strongly recommend the data collection obligation be prospective – from the date of publication of the DERR guideline. Entering default values in the place of gaps in the existing dataset—based on standards and assumption—for basic (<5 kW) PV installations may be an option. What is the process to agree exceptions with AEMO and manage data quality for existing data? Will an exception flag be permanently set against these records? Exceptions suppressed for records prior to 1 Dec? We suggest the industry and AEMO agree on the rules for managing exceptions and formalise them in the guidelines.
4	4.3 Data submission timing and frequency	Clarity sought on 20 business day SLA. AEMO's draft decision (on p2 of the report) notes: "The Guidelines will require NSPs to submit DER generation information on an ongoing basis, with information to be submitted no later than 20 business days following the date of installation, change or decommission."	Installer and NSP SLA's for Tasks 1.4, 1.9 and 1.14 are required to be clearly articulated. • What SLA applies for the initial NSP submission of connection application/job number parameters (Task 1.4 in Data Collection process flow)? What SLA applies for the Installer to upload subsequent installation information (Task 1.9)? • What SLA applies to the NSP for actioning exceptions (Task 1.14)?
4	4.4 Format of data submission	Note: Jemena is supportive of an API based submission mechanism.	
4	4.4 Format of data submission	It is noted that a companion guide will be provided.	AEMO to confirm timing of when this will be provided. Jemena would like to see this released as early as possible, otherwise late

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			technical/process detail changes could delay IT system readiness for 1 December 2019.
6	6 Access to DER Generation Information	Jemena requires the ability to electronically access a report with a full dataset (all fields from all 3 tables) for reconciliation purposes, for all NMI's?	
App A	Data Model	Jemena notes that the following fields have not been historically captured and cannot be provided for existing installations (prior to 1 Dec 2019). <u>DER Installation:</u> • Installer identification <u>AC Connection:</u> • Inverter serial number <u>DER Device:</u> • Device manufacturer • Device model number • Device subtype	These fields will be left blank in the DERR for Jemena's historic records (prior to 1 Dec 2019).
App A	Data Model	For the Status Code fields {active, inactive, decommissioned}, Jemena seeks clarification on the definition of inactive or decommissioned.	Does AEMO have a common defined period for which the site has had consistently zero generation reads, that would be classified as 'inactive' or 'decommissioned'? Or would this be defined individually by NSPs?
App C	Data Model Configurations	For Scenario H, for a multi-NMI installation – what is the expected workaround for the current proposed data model?	Options to consider: • Would the NSP or installer simply select one of the NMIs to nominally link to the DER Register? • Could an additional field be included in the DER Installation to list other related NMI's in a multi-NMI scenario?
Timing	Deadlines	The current Guidelines are not sufficiently detailed for Jemena to commence system changes from 1 June	Simplification of the data collection process, would focus the IT working group on the interaction between NSP and AEMO – and allow NSP's to

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		2019. Even with IT working groups commencing in May, it is not expected that technical process and details will be sufficiently matured and understood for us and other industry participants to be ready for 1 December 2019.	modify existing interactions with installers to capture AEMO's DERR information.