Stakeholder Feedback Template

This template has been developed to enable stakeholders to provide their feedback on the draft DER Register Information Guidelines.

AEMO encourages stakeholders to use this template, so they can have due regard to the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern.

Stakeholder submissions will be published on AEMO's website unless they are clearly marked as being confidential. Submissions should be sent to DERRegister@aemo.com.au by Wednesday, 24 April 2019.

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Questions		Feedback
1	Draft report, 4.2.2 *For example, should DNSPs ensure that retail customers are made aware of the procedures for reporting any material changes to a DER installation, and that inverter manufacturers are also aware of this and support their customers in meeting their contractual requirements?*	We agree that inverter manufacturers or installers should support the customer to meet their contractual obligations to the DNSP through clear, easily available, and stable information on the obligations published by the DNSP.
2	Draft report *Appendix B, Ausgrid: "There has been minimal discussion regarding how the connection application process is incorporated into the collection, submission and validation of information for the DER register and Ausgrid would be keen to explore this in more depth in follow up stakeholder consultation sessions"* *AEMO: "Noted, Ausgrid has representation in Delivery Team 2 and AEMO is open to discussions on this matter."* Are there foreseen to be any impacts on connection application processes, particularly the meter installation process?	If there is any impact on the process retailers should be involved in this stage of delivery; in addition, while it may not directly impact the regulatory timeframes retailers have to meet in installing a meter, it does affect the overall customer experience and end-to-end timeframe for the customer.

3	In the report *"AEMO notes that the rules made by the AEMC specify which market participants are permitted to access the DER Register information. The rule does not include retailers."*	It should be clarified with the AEMC if the intention was to expressly prohibit retailers (as third parties) from accessing the DER Register. While we understand the intention of the DER register is primarily for NSPs and AEMO, as AEMO would be aware there is currently work being done by the ACCC to apply open banking and the consumer data right (CDR) to the energy sector. We understand that DER register data[1] is being considered as a potential priority NEM dataset by the ACCC and Treasury. In this scenario DER register information will be made available to retailers and/or third parties as long as consent has been provided by the consumer in accordance with the ACCC rules. More broadly, consideration also needs to be given to consumers wishing to access their data directly and whether the DER register should be designed to allow this – this appears to be the policy intention of the consumer data right reforms and doesn't appear to be explicitly excluded by the AEMC either. We recommend, therefore, that consideration be given to future proofing the DER dataset and APIs for retailer or third party access – if not now, at a future stage. This might require AEMO to reconsider whether this database should sit in MSATS or at least have future portability into MSATS if a separate solution is chosen now.
4	*"DER generation information will be decoupled from MSATS and stored in an AEMO managed database with data encrypted at rest and access protected with appropriate authentication and authorisation. The DER Register information is intended to be identified by NMI and is tightly coupled to NMI standing data."*	Further to our points above we suggest AEMO should have consideration to future costs of eventually integrating the DER generation database into MSATS, and the design of the decoupled database should have the ability to be easily integrated into MSATS in future if needed.

[1] Consumer data right in energy; Consultation paper: data access models for energy data, ACCC, 7.1.6, pp.21, https://www.accc.gov.au/system/files/ACCC%20consultation%20paper%20-%20data%20access%20models%20for%20energy%20data.pdf

Section	Subsection	Issue	Suggestions
4	4.3 Data submission timing and frequency	*The maximum period for a completed submission of DER generation information for a site installation is 20 business days following the date of the installation.* What is the exact trigger point for *"date of installation"*? We recommend this be precisely defined by AEMO in its guideline, otherwise there might be a scenario where each DNSP interprets it differently. This might result in indirect effects through inconsistent application to installers, who are likely to have obligations imposed on them through DNSP procedure and guidelines.	Below are a number of suggestions: • Point 1.5 for the process flow map F.3 Overview of DER Register Draft Collection Process flow in the DER report "Approved installation commences". This may not take into account potential physical delays to installation; • When the installation is actually active and exporting energy; this would need to be added to the process flow map and could be linked to when MSATS is updated with the new meter registers (notwithstanding that AEMO has chosen not to use MSATS, this would still be possible) In any case, any reporting obligation on the DNSP will have a flow on effect to the installers through DNSP policy and procedures. It might also be prudent to include in the guidelines that amendments to DNSP policy, procedures and model standing offers as a result of the DER Register Information Guideline must be consistent with the obligations imposed by the guideline.
7	7.1 DER Register Report	*AEMO will publish a DER Register Report by region, installed capacity (MW, MWh) and fuel type, which are to be aggregated at a postcode level and state level – subject to privacy.* *AEMO also notes that DNSPs already have this capability (of aggregating data at feeder level) and would be required to provide AEMO with the associated NMI lists to aggregate at this level*	We agree that privacy is a substantial concern, however as noted by AEMO, DNSPs already have information on feeder level constraints. We encourage AEMO to look further into this and providing a DER Register report at feeder level (or substation) where installations can be sufficiently aggregated for better understanding of constraints to make the report more useful. We agree and support providing the data in CSV file format.