

# Stakeholder Feedback Template

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

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](mailto:DERRegister@aemo.com.au) by Thursday, 07 March 2019.

Organisation: Red and Lumo Energy

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Questions	Feedback
<b>Section 3.1 – Information requirements</b>	
<p>1</p> <p>Do you agree with the suggested format and method of data submission?</p>	<p>Red Energy and Lumo Energy (Red and Lumo) are supporting of AEMO seeking to use existing formats and platforms to support DER information. We However, we have some concerns in relation to the suggested format and method proposed by utilising MSATS.</p> <ul style="list-style-type: none"> <li>• Incorporating this into MSATS would require cost, procedure amendments and schema upgrade for market participants and their systems that needs to be considered.</li> <li>• Will this information be accessible through NMI discovery or only available to NSP and AEMO.</li> <li>• Is it AEMO’s plan to include this DER information and make it visible via NMI Standing Data as well as NMI Discovery? Would this information be visible to all participants</li> </ul>

Questions	Feedback
	<ul style="list-style-type: none"> <li>Unless DER information is loaded into MSATS for all existing sites as well as future this will have minimum value to market participants. We believe this needs to have retrospectivity to go forward with support.</li> </ul> <p>AEMO has already developed and implemented similar platforms for supporting the submission of related data through the Demand Side Participation Information portal (DSIP).</p> <p>Given the data required through the Distributed Energy Resources (DER) and Demand Side Participation (DSP) overlap, we see value in both being combined into a single source register, we strongly urge AEMO to consider merging DER and DSIP into a single process, format and guideline.</p>
<p>2</p> <p>Are there adequate access arrangements for Installers and installation software providers to submit data on behalf of NSPs into the DER Register? If not, how might this be improved?</p>	<p>Red and Lumo would not be supportive of this obligation for lodgement being placed on installers and would be unsure how this would be handled in any case as it would be done through MSATS. We note that the current CATS Procedures do not cater for any party other than a LNISP, Retailer, MC, MDP, MP and ENM to submit any CATS requests into MSATS.</p> <p>This could become complex if this was a third party outside of the NSP submitting, we suggest that the obligation to submit and update only sit with the NSP.</p> <p>The installer's should be made to provide all required information as part of the approval process/ network connection agreements prior to installation.</p>
<p>3</p> <p>Are there any risks associated with the different submission frequency between the <i>DER generation information</i> and <i>DSP information</i>?</p>	<p>If information would be visible and accessible to all market participants via NMI Discovery, be applied retrospectively to all existing sites (not just applicable to new) then we are supportive of the on-going frequency proposed to DER generation information.</p>
<p>4</p> <p>What is an alternate approach to the frequency of data submission? How would this be implemented?</p>	<p>-</p>

Questions	Feedback
5 Are there any other relevant issues that have not been considered?	Red and Lumo believe this should in no way sit with the retailer or the installer and any data submission must be the responsibility of the NSP.
<b>Section 3.2 – DER register storage</b>	
1 Are there any issues associated with the separate storage of <i>DSP information</i> and <i>DER generation information</i> ?	<p>AEMO has already developed and implemented similar platforms for supporting the submission of related data through the Demand Side Participation Information portal (DSIP). We fail to see any benefit in keeping these processes separate.</p> <p>Given the data required through the Distributed Energy Resources (DER) and Demand Side Participation (DSP) overlap, we see value in both being combined into a single source register, we strongly urge AEMO to consider merging DER and DSIP into a single process, format and guideline.</p>
2 Are there any other relevant issues that have not been considered?	-
<b>Section 3.3 – DER register information access to NSPs</b>	
1 What <i>regulatory obligations or requirement</i> do NSPs intend to use DER register data for?	-
2 Do you have a preferred process for accessing <i>DER register information</i> ?	We are supportive of this information being accessible through NMI discovery process if applied to all existing sites.
2a Is existing NMI discovery (adding in DER) useful?	See above response.
2b Are existing C1, C4 and C7 reports (including DER) suitable? Is an additional report required? If a new report is required, what should it include?	-
2c What are your views on using an API to develop custom reports?	AEMO needs to consider the use of API's by market participants and how much value this would have.
3 Do existing C1, C4 and C7 reports need to be provided if an API is provided?	As per above response, majority of market participants have not adopted API. AEMO needs to consider the implications this may have to some participants.

Questions		Feedback
4	Are there any other relevant issues that have not been considered?	-
<b>Section 3.4 – AEMO reporting and publication</b>		
1	Are there additional variables that should be published in the <i>DER register report</i> (see Appendix B for list of data)? Why?	-
2	Is aggregation at the post code level suitable? If not, what is an appropriate aggregation variable and why?	-
3	Do you agree with monthly updating of the <i>DER register report</i> ? Why/ why not?	-
4	Are there any other relevant issues that have not been considered?	-
<b>Section 4.0 – Proposed Data</b>		
1a	What are the costs and impacts of AEMO’s proposed data requirements? Please break down and describe the costs based on: Upfront once-only costs vs ongoing costs	This is dependent on whether AEMO choose to synchronise both DSIP and DER, implement MSATS changes to facilitate this change. Otherwise, we see no cost implications.
1b	What are the costs and impacts of AEMO’s proposed data requirements? Please break down and describe the costs based on: Separation of internal labour costs, contracted labour, system improvement	There are no cost implications if the obligations to report is given to the appropriate party being the NSP only.
2	Do you agree with the proposed data requirements? Why/ why not?	-
3	Do you agree with the proposed data structure (see appendix B, figure 3)? If not, please explain why it would not work and propose an alternative.	-
4	Should data variables that have default values prescribed by the AS4777 standards (e.g. Under-frequency protection, Over-frequency protection, Undervoltage protection, Overvoltage protection, etc) be requested as discrete inputs? Why/ why not?	-
5	For the AC connection table (appendix B), is it relevant to include protection modes for non-inverter DER? If so, what is the relevant information that should be captured?	-

Questions		Feedback
6	Do you agree with the data source/ providers for the physical collection, listed in Appendix B? If not, explain why and who else or what other data sources should be involved.	-
7	Are there any other requirements that have not been considered? Why are these important? Which table are they relevant to?	-
8	In terms of the examples given, are there other DER installation configurations that AEMO should consider?	-
9	Are there any other relevant issues that have not been considered?	-
General Comments		
1	Do you have any other comments?	<p>Red and Lumo overall are generally supportive, the main issue we have is around the management of data being submitted. We would not be supportive of this obligation for lodgement being placed on installers and would be unsure how this would be able to be managed through current MSATS access.</p> <p>We also see value in the data being consolidated holistically across DER, DSIP and where possible remove duplications of information. Allowing duplication just adds to the risk of creating of inaccurate records.</p>