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Response to AEMO consultation on the DER Register data collection process

Redback Technologies is a technology company focused on the development of advanced, low cost solar solutions for residential and commercial users. Redback's innovative hardware and software technologies assist customers to capture, store and manage solar energy, delivering an accelerated return on investment and enabling greater penetration of renewables on the grid.

Redback Technologies is constantly looking for ways to increase value for customers by focussing on the efficiency in the integration of our hardware and software design with installation and ongoing support. We have reviewed the data collection framework AEMO has developed through this lens.

AEMO's indicative high level data flow makes it clear that the success of AEMO's register is dependent on the extent to which NSPs and AEMO can streamline the process for information gathering, remove duplication and avoid additional obligations on installers.

The DER Register was borne out of changes to the National Electricity Rules late last year. In making its decision, the Australian Energy Market Commission's intent is for a process that results in "...no additional or modified obligations [] placed on customers or parties other than NSPs".¹ Inherent within the final rule therefore is an expectation that processes will be streamlined between NSP and AEMO such that information requirements are only entered once, are not duplicated and do not add onerous obligations on customers or other parties.

More information is therefore required on how AEMO proposes to streamline the process where information already submitted is pre-populated and available for edit. It will be also important for AEMO to demonstrate how the interaction between DNSP and AEMO places no additional obligations on installers.

In particular, we are interested in the level of additional data entry or rework required between the lodgement of the application in step 1.1 and the processing of adding/editing data for submitting in steps 2.3 and 2.4. We also note that AEMO's process assumes a pre-population of fields regarding make/model of devices. It is our understanding that this will be sourced by AEMO from existing data held by the Clean Energy Regulator, but how this data is included in pre-populated fields is not clear in the process outlined.

We understand that AEMO has been in close discussions with DNSPs who have also indicated preference for a single process common across all jurisdictions. This is timely given the recent

¹ AEMC, Register of distributed energy resources, Rule determination, 13 September 2018, p45

release of the ENA connection guidelines and the opportunity to create a nationally streamlined process for information gathering and data entry meeting the needs of both AEMO and the NSP.

Over time we expect that information requirements will begin to align between AEMO and NSPs as access to information regarding DER capability and capacity at a connection point level will be necessary to meet both system and market needs. This is why we believe the most effective solution involves integrating data requirements with the network connection application, with installers required to verify information once the connection application is approved as well as providing updated information for changes outside a new or modified connection.

We agree with NSPs that work should be undertaken to develop a single, streamlined on-line processes which integrates system and manufacturing information and standardises connection applications. Integrating pre-populated supplier and manufacturer data into the NSP connection process as a conduit of the AEMO register would improve installer and customer outcomes.

Any process which is dependant on manual rework by installers or is frustrated by a lack of integration between NSPs and AEMO (resulting in delays) will likely fall short of what the Rule intended and will result in DER installers incurring additional cost, and impact the quality and completeness of the information on the register.

We look forward to engaging with you further on this challenging but important initiative.

Sincerely

A handwritten signature in black ink, appearing to read 'Brendon Crown', with a long horizontal flourish extending to the right.

Brendon Crown
Director – Market Development