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 by Thursday, 07 March 2019.

Organisation: The University of Sydney Law School

Contact name: Dr Penelope Crossley

Contact details (email / phone): Penelope.crossley@sydney.edu.au, 0449 232 474

Questions		Feedback
Section 3.1 – Information requirements		
1	Do you agree with the suggested format and method of data submission?	In the Distributed Energy Resources Register Information Guidelines – 2019, section 3.1.3 states 'The intention is that any physical changes to a DER installation (e.g. install, removal, retrofit) at a NMI would initiate an update to the DER Register.' For clarity, this section should probably also refer to a warranty replacement (including a 'like for like' replacement).
2	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?	
3	Are there any risks associated with the different submission frequency between the *DER generation information* and *DSP information*?	
4	What is an alternate approach to the frequency of data submission? How would this be implemented?	

Questions		Feedback
5	Are there any other relevant issues that have not been considered?	
Section 3.2 – DER register storage		
1	Are there any issues associated with the separate storage of *DSP information* and *DER generation information*?	
2	Are there any other relevant issues that have not been considered?	
Section 3.3 – DER register information access to NSPs		
1	What *regulatory obligations or requirement* do NSPs intend to use DER register data for?	
2	Do you have a preferred process for accessing *DER register information*?	
2a	Is existing NMI discovery (adding in DER) useful?	
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?	
3	Do existing C1, C4 and C7 reports need to be provided if an API is provided?	
4	Are there any other relevant issues that have not been considered?	
Section 3.4 – AEMO reporting and publication		
1	Are there additional variables that should be published in the *DER register report* (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 *DER register report*? Why/ why not?	

Questions		Feedback
4	Are there any other relevant issues that have not been considered?	
Section 4.0 – Proposed Data		
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	
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	
2	Do you agree with the proposed data requirements? Why/ why not?	There also needs to be consideration of a 'new type' or 'other' with a free text entry box supplied in the 'Device sub-type' category. A number of emerging battery chemistries are not listed. Query whether there is also sufficient detail in this category. Do you need to have 'lithium ion manganese oxide?'
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?	
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 their other DER installation	

Questions		Feedback
	configurations that AEMO should consider?	
9	Are there any other relevant issues that have not been considered?	Can this work stream draw on the existing cost-benefit analysis that many stakeholders participated in?
General Comments		
1	Do you have any other comments?	I am concerned that there seems to be a lack of consideration about the provision and use of this data for emergency planning/first responders, industry groups, energy consumer advocates and for academic researchers. Please consider giving better access to these groups – either as of right or upon a formal application process.