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 / Other Issues		Feedback
1	Is 1 KW as appropriate minimum size of small generating unit to capture in the DER Register?	A minimum size of 1kW seems reasonable.
2	Are standard, packaged reports also required for NSPs? If so, what information is required?	Ausgrid has no strong views at this stage on standard reports without more detailed consideration. What is most important to Ausgrid is to allow access to obtain all information submitted to the DER register post-validation of DER installation information in it's network area. For example, not just the submitted data that has been deemed invalid for exception validation in Step 1.12 but all information that has been submitted by installers.
3	What is the most effective means to communicate and inform key stakeholders on how to use the DER Register?	An instructions document on how to access information from and submit information to the DER register would be required. User information sessions, particularly for installers and other data providers would also be beneficial.
Draft Report – Appendix F	Timeframe for the data entry to timeout and automatically submit, given it is not accessed by an installer?	Automatic submission of data when not accessed by installers should be re-considered as to whether this is the appropriate default action. Default expiry of an accepted connection application data in the DER register (level 1) after a

		defined time period may be a more appropriate default action if it has not been accessed by an installer. Ausgrid currently allows an accepted connection application offer to be valid for 12 months before it expires. In some instances, the customer may not go ahead with the DER installation associated with an accepted connection application. In addition, there may be multiple connection application submissions and offers for a site and only one of these applications is accessed and the installation completed. Further feedback from other DNSPs should be sought, but Ausgrid would recommend an automatic expiry after 12 months of details provided to the DER register from the NSP to the AEMO DER register (Step 1.4 in the data collection flow process) that is not accessed by an installer in step 1.6 (in it's current form). Alternatively, if other validation processes can be used, such as confirmation of exported electricity to the grid using bi-directional meter information, this could be used to trigger an automatic submission of an entry into the register.

Draft DER register information guidelines – DRAFT GUIDELINES

Section	Subsection	Issue	Suggestions
3	3.2 Demand Side Participation	Ausgrid disagrees with AEMOs assessment that access to Demand Side Participation Information by NSPs through the DER register would not assist in fulfilling our regulatory obligations or requirements. In particular, maximum demand forecasting for a network asset involves understanding customer load behaviour and trends on network peak demand days when peak price signals are more likely to occur. A better understanding of how customer load or generation is behaving in response to price signals would assist Ausgrid (and other NSPs) informing our load forecasting function and lead to better network investment decisions. The DSP information holds useful information such as whether individual sites are participating in active load or active generation DSP activities as opposed to passive generation sites.	Status flags or even basic knowledge of sites that are participating in DSP activities and the type of DSP activities would assist Ausgrid (and we believe other NSPs). For example by including (at a minimum) a flag against the NMI at Level 1 in the DER register that indicates whether the NMI is included in either Data Model 1 or Data Model 2 of the DSP Information Guidelines and what type of DSP information it is (eg. categories in Data Model 1 or DSP type fields in Data Model 2) would be beneficial. Alternatively, a separate consultation on how DSP Information can be accessed by NSPs to assist with their regulatory obligations would be welcome.

		This would help inform whether load behaviour not only requires correction for weather characteristics but also response to other pricing signals in order to better understand the underlying trend in electricity maximum demand. This has been recognised by stakeholders in recent regulatory and industry discussion papers including the AEMC rule change process around introducing a Wholesale Demand Response Mechanism and the most recent report released by AEMO on the Technical Integration of DER. Visibility of active load and generation forms of DER responding to other price signals is regarded as an important area of further development in the coordination of DER for overall electricity system benefits. Ausgrid believes that incorporation of relevant DSP Information into the DER register would be an important first step to addressing this area.	
Appendix A	Data Model 1	In the data model level 1 structure, there does not appear to be any aggregate inverter/ generation or export capacity limitation fields for sites without central protection or control . For example, currently Ausgrid approves the total inverter/ generation capacity for a NMI where as other NSPs may approve a total export capacity for sites less than 30kVA that do not require central protection devices. Without this information supplied by the NSP to the DER Register, the installer would not be able to access the allowed capacity limitations directly from the DER Register from the accepted connection agreement information provided by the NSP to the register. Some more detailed worked examples may help to clarify the intention here regarding how information is provided into the DER register from different parties	Consider the need for addition of an NSP approved total inverter/ generation capacity limit or export capacity limit to Level 1 for sites that do not have central protection requirements. For example; • NSP approved export capacity limit • NSP approved total generation capacity limit (usually taken as the total inverter capacity) This issue can be further explored with stakeholders in the delivery teams.

Section	Subsection	Issue	Suggestions
Appendix F	F.2 and F.3 diagram (Connection Application Process)	There are some further improvements in the connection application, offer and acceptance process (steps 1.1 to 1.4) that should be captured in the diagram and associated description given that this will become part of the guidelines as referenced in section 4.1 in the draft guidelines. For example, step 1.1 lodgement of connection application is done by the connection applicant (not installer as currently indicated in the descriptions to the left hand side of the diagram). The *Connection Applicant* could be the retail customer, retailer or other agent acting on behalf of the retail customer or real estate developer (see definition of connection applicant in Chapter 5A of the NER for example). The NSP and connection applicant follow an application, offer and acceptance procedure following the Rules with different time frames depending on whether the application for a connection service fits into the category of a basic connection service (expedited or not expedited), standard connection service or negotiated connection service. We envisage that the details from the approved and accepted connection offer by the connection applicant is what NSPs would provide to the DER register according to the level 1 data model requirements. These details would also pass back to the connection applicant in a step between current steps 1.4 and 1.5. For the purposes of this response, this step could tentatively be called 1.4b "acceptance of connection offer". In this case, there would become a flow of information between the connection applicant from step 1.4b to their nominated installer, with the current step 1.5 being "Nominated installer receives approved connection application details from the connection applicant"	Ausgrid can be contacted further on this suggestion and would recommend the following amendments; • Adapt the F.3. diagram to include an extra row at the top called Connection Applicant (Customer). • Place the Step 1.1 in the Connection Applicant row (not installer row) • Add an additional Step 1.4b (or other renumbering as required) in this row that acknowledges the passing of information from the NSP at Step 1.4 to the connection applicant and their acceptance of the connection offer. • Recognise the information flow between the connection applicant at Step 1.4b and their nominated installer at Step 1.5
Appendix F	F.3 – diagram (Steps 1.6 to 1.8)	In our opinion, the ability to have additional notifications to the DNSP during steps 1.6 to 1.8 of installers accessing and editing data in the DER register during installation would be	

		advantageous and should be explored. For example a • Notification of information access after Step 1.6 / 2.1 • Notification of DER installation data validation submission after Step 1.8 / 3.1	
Appendix F	F.3 – diagram (1.12 Send to DNSP)	In our opinion, Step 1.12 in the current collection process flow should send all submitted DER register information to the DNSPs not just exceptions. An exception flag status can be included in this step. In addition, a reason for the invalid data or exception flag should also be included.	