

6 March 2019

Australian Energy Market Operator
Level 22, 530 Collins St
Melbourne
Victoria 3000

By email: DERRegister@aemo.com.au

Dear AEMO DER team,

Re: Distributed Energy Resource Register Information Guidelines Issues Paper

GreenSync welcomes the opportunity to comment on the Distributed Energy Resource Register Information Guidelines Issues Paper (Issues Paper). We are a global energy-tech company connecting millions of energy resources to create more dynamic energy networks. We work with Australia's leading electricity retailers and network providers to create more flexible and decentralised grids that can maintain stability and efficiency while absorbing more renewable energy.

We commend AEMO for pursuing the establishment of the DER Register and in its leadership of future-grid oriented initiatives more broadly, such as the VPP API developments. The DER Register represents a first step towards increasing visibility of DER on the system and moving towards a future where dynamic visibility and management of interoperable distributed assets is the norm, not the exception.

GreenSync has engaged in the consultation activities for the DER Register in part to ensure that we understand the requirements for our Australian clients, customers and stakeholders and to be in a position to help them satisfy obligations with regard to data capture and collection.

Set out below are our general comments relating to the DER Register, rather than the specific questions posed in the Issues Paper per se.

DER data volumes are growing exponentially

Australia's energy system is decentralising at a rapid rate and the AEMC's recent rule change that requires the Australian Energy Market Operator (AEMO) to establish a register of distributed energy resources¹ represents a response to the emerging gaps in information requirements, data collection, and network business approaches to issues of connection and communication in relation to distributed energy resources (DER).

¹ <https://www.aemc.gov.au/rule-changes/register-of-distributed-energy-resources>

GreenSync's decentralised energy exchange (deX) will enable smart DER owners to gain incentives for making their DER available to provide services for other parties via deX. Data capture that is digital, dynamic, and as simple and transparent as possible (for both installers and asset owners) will maximise the trading capabilities of the deX marketplace, and hence the scope for customers to increase the value of their assets.

As we move towards more transactive energy markets with increasing market participation, efficient data collection, coordination, and dissemination will be important. The emergence of new energy ecosystems, such as the deX marketplace, will generate enormous quantities of data in relation to distribution networks and the assets they host. Any new data collection obligations should be mindful of emerging dynamic data capture, collection and repositories of DER activity across networks.

Broad industry collaboration is essential for data capture

We support a cross-industry, collaborative approach to developing the DER Register to harness the views and expertise of a wide range of stakeholders, particularly those who are developing solutions to enable consumers to maximise the value of their DER, and for the DER to be utilised to support the energy system.

AEMO's preliminary work on the DER Register appropriately allocates the collection point responsibility with network businesses, but (as acknowledged in recent workshops) there will be heavy reliance on installers and their back-office processes for primary data input. We suggest that more work is required to validate assumptions regarding the extent to which installers are able to meet the requirements for DER data collection.

Design and implementation require careful and inclusive planning

Data belongs to DER asset owners and must be protected. Asset owners will be reluctant sharing their data unless they understand its value, receive fair recognition and, potentially, remuneration for making it available to other parties and receive assurance that their data will be protected or used appropriately. This means that careful planning will be required to ensure that DER data is protected and that assets owners are able to be appropriately rewarded and recognised for making their data available to energy market participants.

Planning should encompass any transition periods that will be provided to installers and network businesses, as well as both training programs to be delivered ahead of implementation of new data reporting requirements and ongoing guidance and resources.

Compliance presents a major challenge for new reporting obligations

Current proposals for DER data collection rely heavily on the role of installers which may lead to the divergence and difficulty of enforcing compliance with any new requirements. It should also be noted that any impacts for customer experience will affect implementation of DER data collection.

AEMO may find it useful to examine an incentive scheme initiated by Ergon Energy and Energex in March 2018 whereby home battery system owners were asked, then incentivised to report their system in exchange for a one-off payment of \$50. This incentive scheme yielded an uptake rate of just 30%.

The limitations of static data capture should be acknowledged

We agree that the DER Register represents an initial first step towards increasing visibility of DER on the system. We understand that the register will be static in the first instance. However, with uptake of residential batteries and electric vehicles forecast to surge over the next decade, we question the longer-term viability of a static register given this foreseeable change. Nonetheless, we acknowledge the context in which AEMO is delivering this Register as a start.

Emerging solutions should be considered

As we move towards more transactive energy markets with increasing market participation, efficient data collection, coordination, and dissemination will be important.

GreenSync has a number of projects in development that can support our clients and stakeholders with data collection needs and future market opportunities. Our software solutions will play an important role in DER data capture, collection and support to our clients to meet their obligations under the DER Register today and, more importantly, deliver a path to flexible market opportunities.

We recognise the benefit of the Register conceptually and the wider interplay it may have - over time - with other initiatives such as VPP trial, state government programs and incentives, as well as future federal government approaches to DER. We believe this step from AEMO will give the industry an opportunity to explore how to best encourage registration of assets; integrate and utilise data; and leverage various incentives programs to their fullest extent.

For queries in relation to these comments, please contact Bridget Ryan on 0402 115 589 or bridget.ryan@greensync.com.

Your sincerely,



Bridget Ryan
Policy and Government Lead