

CER STAKEHOLDER WORKING GROUP

MEETING NOTES

Friday 29th July (1:00pm-3:00 pm AEDT)

Chair: Neil Gibbs (Online Power)

Attendees: Aden Barker (WA Department of Energy); Alida Jansen Van Vuuren (Ausgrid); Anthea Harris (ESB); Brian Spak (Energy Consumers Australia); Bryn Williams (SAPN); Chris Alexander (ESB); Christian Rasmus (AER); Darren Gladman (Clean Energy Council); Declan Kelly (Flow Power); Dor Son Tan (ENA); Ed Chan (AEMC); Emma Fagan (Tesla); Grant Stepa (Distributed Energy Services); Isabel Durie (AER); James Sturch (Solar Edge); Jess Christiansen (RACV Solar); Jo Witters (ESB); Jon Sibley (EnX); Miriam Wishart (AER); Neil Gibbs (Online Power); Penelope Crossley (USYD); Ross De Rango (Electric Vehicle Council); Ryan Wavish (Simply Energy); Sam Lynch (KPMG); Sonja Lekovic (AusNet Services); Tennant Reed (Australian Industry Group); Tom Gibson (Online Power); Nicholas Gurieff (EnX); Niraj Lal (AEMO); Philip Hill (EnX); Simon Kidd (AER); Taru Veijalainen (AEMO)

Working group protocol

Attendees at this meeting must not enter into any discussion, activity or conduct that may infringe, on their part or on the part of other members, any applicable competition laws. For example, members must not discuss, communicate or exchange any commercially sensitive information, including information relating to prices, marketing and advertising strategy, costs and revenues, terms and conditions with third parties, terms of supply or access.

Topic	Key points/action items
Introductions & Welcome	 Anthea Harris opened the session with an acknowledgement of country. Thanks was provided to those that attended the quarterly update on 28/7/22 and noted the upcoming electric vehicle charging public webinar on 2/8/22. A summary of the agenda was covered.
Regroup on session 5	 Neil Gibbs provided a summary of the session prior. The meeting notes were accepted with no additional amendments ready for publishing on the ESB website.
AEMC Standards Governance Review	 Ed Chan, AEMC, presented an overview of the Standards Governance review being undertaken by the AEMC. The following is commentary and questions raised by the SWG following the presentation: From a perspective of compliance and enforcement – a lens on interpretation and what entity is to take the lead role in the interpretation of the standards. "What entity makes the final decision?" This is unclear to stakeholders, as there appears not to be one entity nominated; this leads to confusion.

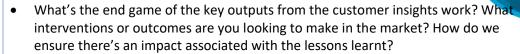
- There is a need to delineate between standards and equipment capability. Is the equipment compliant and safe? Are the settings setup and maintained across the lifecycle of the asset? Generally, standards are national and should reflect the diversity of regulatory frameworks.
- Initial thinking on EV charging has indicates that there may be a need for
 external control/autonomous settings, and how might this differ from regulatory
 needs? For solar we've leveraged financial incentives for compliance in the
 absence of other heavy handed regulatory requirements. If you don't go
 through the appropriate processes, then you're not eligible for the financial
 incentive this won't hold for EVs (as there are no such incentive structures).
 - With respect to financial incentives/signals they are different for Solar and EVs. Solar has an upfront incentive with an ongoing benefit (being the output of the solar system). The benefit of EVs is when they choose to charge. As a result, we need the signals at that point to be correct to inform consumers.
- It will be important to distinguish between mandatory and 'quasi' non mandatory standards and relevant impact to cost. Cost-benefit analysis needs to be undertaken to ensure consumers are not adversely impacted.
- The real issue with standards is there is limited analysis undertaken upfront: cost benefit analysis, regulatory impact statement, business impact statement etc. Jurisdictions are often using standards as a way to implement policy without the balance of cost-benefit analysis.
- An important governance issue to be considered for review by the AEMC is where the national framework ends and the jurisdictional frameworks begin.
 One of the challenges: industry is unsure of who the regulator is for behind the
- Compliance really needs to focus on settings/installation rather than just the product. Based on OEM experience, 100% of inverters are technically compliant if installed correctly (indeed, it is hard to get access to non-compliant inverter products). However, 84% of non-compliant installations are due to the wrong settings being configured by the Installer. The issue is that installers are not putting products on the right settings. If the AEMC is not looking at compliance of settings/setup, then the review will be of limited value. If the AEMC ambition is to ensure that products are compliant in their operational state, then the Review must consider the installation process, which is overseen by Jurisdictions; how will that be achieved?
- Standards Australia provides limited transparency in how committee decisions are made when standards are being adjusted.
- Ed noted that AEMC will be publishing an Issues Paper in September.

Customer Insights Knowledge Sharing Paper

• Chris Alexander presented the findings of the first phase of the Customer Insights work.

The following is commentary and questions raised by the SWG following the presentation:

- To what extent do consumers understand their roles in the CER ecosystem?
- Noted the meta study of network trials for ESBs work an avenue to get consumer reactions.



- ESB: Intention is to apply these insights immediately via Horizon 1 projects – using the report and working closely with project teams to inform their design and decisions.
- Chris noted that these papers have been published on ESB website.

• Miriam Wishart, AER, presented on the initial findings and approach for the AER DOE paper.

The following is commentary and questions raised by the SWG following the presentation:

There is an ongoing tension between maintaining DOEs or extending the Distribution physical network. However, don't see it as either/or - Flexible Export enable NSPs to manage the performance of the network. How much energy is being curtailed? When does it become economic to add more capacity? CECV as the primary means of quantifying the losses/additional energy that can be exported to the market.

- Noted impact on framework for AER on regulatory proposals.
- Suggested reframing of the paper to 'Flexible Exports Limits'.
- The tone of DOE being applied to energy imports (or consumption) is unlikely to be supported by consumers. Support change to Flexible Exports addresses the fact that the intent is not to impact consumers using energy.
- The flexible limit is intended to reflect the maximum available capacity of the network for exports for a customer at a point in time. The customer (or their aggregator) would want to limit exports below that for market purposes.
- The way flexible exports can avoid augmentation, there is ICT investment to facilitate application and make dynamic export limits. Historically, the AER been on wrong side to set more generous flexible limits – impact to network expenditure plan.
- Stakeholder wanted to understand how this work relates to connection charge guideline review?
- The cost assessment framework is unique within the global context. Will it consider OEM costs? There will be significant compliance costs e.g. cost differential for data storage such as 5-min vs. 5-sec costs. How will OEM and Aggregator costs be handled?
- Has there been any consideration of wholesale market impacts in determining efficient flexible export limits?
- DOEs for export are only possible because of the ability to curtail PV. Any DOEs
 for import would be similarly reliant on control. There is a massive job ahead on
 social licence as we develop policy around EV charging standards (and settings).
- Aggregators using a site edge gateway with multiple CER can implement a connection point DOE across the customers CER to minimise any effect of the consumer amenity based on activity, heuristics etc.
- In respect to obligations for verification of data: as most sites will eventually have multiple CER then the CSIP AUS gateway model prevails, and all CER falls in behind the single CSIP connection to a site. The data and DOE compliance

Dynamic Operating Envelopes preliminary paper

	 obligations then rest with the Aggregator/ HEMS gateway so this may mitigate the concerns raised re: OEM compliance costs. Miriam noted that AER will be publishing an Issues Paper in late August.
Meeting Close and Next Steps	 Jo Witters closed the meeting, thanking the key presenters and contributions from the SWG. Highlighted upcoming submission deadlines and the EV Charging public webinar.
Recorded actions	 Publish session 5 notes to the ESB website. Suggestion to add Project Edith to the next CER SWG agenda. Extend invites for the following sessions of the CER SWG.