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Anthea Harris
Chief Executive Officer
Energy Security Board
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Lodged via email at info@esb.org.au

Dear Ms Harris,

Energy Security Board's interoperability policy directions paper

Jemena Electricity Networks (**JEN**) welcomes the opportunity to respond to the Energy Security Board's (**ESB**) interoperability policy directions paper (**the directions paper**). JEN supports the ESB's continued engagement on matters relating to consumer energy resources (**CER**), including the role that distribution network service providers (**DNSPs**) play in securely managing customers' export services.

The directions paper seeks input from stakeholders on pathways to achieve a nationally consistent implementation of an Australian adaptation to the common smart inverter profile (**CSIP**) IEEE 2030.5 implementation guide for smart inverters (**CSIP-Aus**).¹ Overall, we support the ESB's objective to implement a nationally consistent framework, as this approach presents the lowest-cost, lowest-risk and more accessible option for all stakeholders and will deliver positive outcomes for energy consumers.

However, we question why only one protocol was considered in the ESB's directions paper, and whether alternative protocols may deliver greater benefits to energy consumers. Further, we consider this interoperability policy matter could have been better addressed as part of the Australian Energy Market Commission's (**AEMC**) review of CER technical standards.

Notwithstanding these concerns, overall we consider that CSIP-Aus appears to be an acceptable communications protocol for smaller basic connections (i.e., up to 200 kVA). However, larger connections (e.g. 1MW and above) typically have assets that communicate using a DNP3 communications protocol. Therefore, we do not consider the CSIP-Aus standard should apply in these instances where other acceptable and secure communications protocol solutions are more suitable.

Finally, the directions paper focuses on the appropriate protocol when communicating with solar PV inverters. However, we consider a broader scope should be considered within the interoperability framework, i.e., the mandated communications protocol should:

- apply to all CER devices including solar PV, batteries, electric vehicles and home energy management systems
- apply regardless of whether these devices are exporting back onto the grid or importing from the grid.

This will ensure that DNSPs are not required to invest in multiple communications protocols depending on the connecting CER device and allow DNSPs to securely manage their networks, delivering the lowest-cost energy system for consumers.

¹ ESB, *Interoperability policy directions paper*, October 2022, p. 6.

If you have any questions regarding this letter, please contact me on 03 9173 7000 or matthew.serpell@jemena.com.au.

Kind regards,

Matthew Serpell

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