



20 September 2016

COAG Energy Council Secretariat
GPO Box 9839
Canberra ACT 2601

Lodged via email: energycouncil@industry.gov.au

Dear COAG Energy Council Secretariat,

Energy Storage Registration – Consultation Paper

AGL Energy (**AGL**) welcomes the opportunity to respond to the COAG Energy Council's consultation on the creation of an energy storage register (**the Consultation Paper**).

AGL is one of Australia's leading integrated energy companies and largest ASX listed owner, operator and developer of renewable generation. Our diverse power generation portfolio includes base, peaking and intermediate generation plants, spread across traditional thermal generation as well as renewable sources. AGL is also a significant retailer of energy, providing energy solutions to over 3.6 million customers throughout eastern Australia. In 2015, AGL established a New Energy Services division, with a dedicated focus on distributed energy services and 'behind the meter' solutions including energy battery storage, solar PV systems and digital meters. We are also working with customers to develop a network services capability involving load management solutions.

AGL acknowledges that evolving customer preferences combined with the availability of distributed energy resources and other technologies are transforming how Australia's energy markets (including the National Electricity Market (NEM)) operate. While we recognise the COAG EC's intention to progress the development of an energy storage registry across all deployments, we note that energy storage 'behind the meter' is still in its infancy and believe that unnecessary regulatory burden at this early stage may impact the development of this new market.

However, AGL also recognises that a range of stakeholders, including AEMO and emergency response agencies, have an interest in the collection of different energy storage data sets to meet a range of regulatory and public safety responsibilities.

For example, as outlined in the Discussion Paper, AEMO may require aggregated information to assist in the planning and operation of the NEM, while emergency response agencies and other safety authorities would benefit from more granular data on individual installs to address customer and public safety issues. Similarly, other market observers could simply be interested, at a basic level, in how the market for energy storage (at the grid, behind-the-meter and off-grid) is developing. AGL therefore sees conceptual value in the development of a battery storage registry in Australia, where its overarching purpose is to track market penetration.

However, it is important, in our view, that in determining the nature, scope and governance of the registry, that the COAG EC undertake close consideration of the issues outlined below.



Robust justification of data requirements

As a general principle, AGL believes that there must be clear justification for any data that is proposed to be included in the register, and any data proposal must be weighed against the costs of data creation and provision. This includes an awareness of potential consequential impacts on innovation and investment in the creation of new sources of data, should any new regulatory obligation to collect or provide data be cast too wide or made too onerous.

AGL believes that the registry should only capture basic energy storage data, such as system data¹, installation date and installation postcode. These categories of information are sufficient to provide all industry stakeholders with an equal understanding of energy storage penetration and its impact across different parts of the NEM and network infrastructure in Western Australia and the Northern Territory, without providing a competitive advantage to some stakeholder groups or individuals.

We acknowledge that some additional data² sets may be warranted in limited cases³. However, utilisation of existing data sources, such as MSATs, must be identified and utilised before imposing new obligations and/or creating any unnecessary duplication.

Further, any sensitive information captured must be protected to ensure customer privacy, security and competitive neutrality is not compromised, and access to this data must be limited to authorised parties only. This may require the registry to cater to different levels of access, reflecting the needs of different access seekers, with preference for aggregated data wherever possible to minimise security concerns.

National consistency

AGL notes that a number of industry associations are currently managing (or planning to develop) an energy storage registry in differing forms. There may, therefore, be some merit, in allocating responsibility and ownership of the energy storage register to an industry body, instead of duplicating existing efforts to appoint a government or national body and set up a new registry. For example, the Australian Energy Storage Alliance, the Clean Energy Council and the Australian Energy Storage Council are all currently active in this space.

In our view, there is greater value in establishing a national approach rather than individual jurisdictional registries. In addition to reduced cost, we believe a national registry will also:

- provide a consistent dataset across all jurisdictions and installation types;
- promote a uniform approach to emergency response management;
- provide for regulatory and consumer protection harmonisation; and
- give AEMO and other market parties a consistent, balanced picture of energy storage installs across the country.

AGL therefore encourages the COAG EC to consider how best to create a single, national register which balances costs and complexity against stakeholder effort

1 Including manufacturer details and energy storage make and model number.

2 Such information may include customer installation addresses, National Measurement Identifiers or network tariff details etc.

3 For emergency agencies, safety authorities or by market participants to meet specific existing regulatory obligations.

and value. Ultimately, we believe that the registry should provide all stakeholders with an unbiased source of information on the growth and uptake of energy storage in Australia.



Data Collection

AGL believes there is merit with the position outlined in the Discussion Paper with respect to data collection. Specifically, energy storage installers appear to be best placed to collect and upload energy storage information into the registry where an energy storage system is installed and/or modified.

However, the COAG EC should consider the cost implications associated with training and upskilling of installers, and this should be assessed against other possible solutions such as, Distribution Network Businesses providing this basic information through the existing grid connection processes⁴. AGL also encourages the COAG EC to consider whether different data collectors should be appointed across on-grid, off-grid and behind-the-meter energy storage installations and the regulatory frameworks necessary to give data collection legal effect.

If you have any further questions regarding this submission, please contact Dan Mascarenhas on 03 8633 7874 or myself on 03 8633 6836.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Stephanie Bashir', written over a faint grey rectangular background.

Stephanie Bashir
Head of Policy and Regulation, New Energy

⁴ Outlined in the National Electricity Rules: Chapter 5 and 5A.