



9 June 2017

COAG Energy Council Secretariat
GPO Box 797
Canberra ACT 2601

By email: energycouncil@environment.gov.au

COAG Energy Council Secretariat

Re: NATIONAL BATTERY STORAGE REGISTER CONSULTATION

CitiPower Pty Ltd and Powercor Australia Ltd welcome the opportunity to respond to the Council of Australian Governments Energy Council's (**Energy Council**) National Battery Storage Register Consultation.

We support the proposal to develop a register of small scale battery installations. We also support Jacobs' report for the Energy Council that the register be hosted by the Australian Energy Market Operator or the Clean Energy Regulator. A single register host (i.e. option 1 or 2) would:

- obviate the need for us, and likely other distributors, to each upgrade their IT systems which would be more costly. Our existing systems would not facilitate the proposed information requirements without modification and we currently have no plans to undertake such investment; and
- ensure information is collected, validated and displayed consistently and without the need for protocols to be developed.

Jacobs report considered the types of information that should be made available on the register to distributors. We propose:

- 'NMI identifier (or postcode)' be changed to 'NMI identifier *and* postcode'. The postcode location of a battery installation is not useful to distributors that need to manage load flows and technical constraints on individual feeders and transformers; and
- to add '*short term peak output (if applicable)*' to 'Capacity (continuous kW, and storage kWh)'. Understanding short term peak output capabilities will better allow distributors to contract with battery owners and operators to alleviate network constraints.

Should you have any queries regarding this submission, please do not hesitate to contact Frans Jungerth on (03) 9683 2022 or fjungerth@powercor.com.au.

Yours sincerely

Brent Cleeve
Head of Regulation

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