

19 September 2016

COAG Energy Council Secretariat  
GPO Box 9839  
Canberra ACT 2601

via email: [energycouncil@industry.gov.au](mailto:energycouncil@industry.gov.au)

Dear COAG Energy Council Secretariat

**RE: COAG ENERGY COUNCIL ENERGY MARKET TRANSFORMATION PROJECT  
TEAM – ENERGY STORAGE REGISTRATION CONSULTATION PAPER**

Endeavour Energy welcomes the opportunity to provide feedback on the Energy Market Transformation Project Team's (EMTPT) Energy Storage Registration Consultation Paper. Broadly, the EMTPT consider that a register may enhance the planning and operation of the National Electricity Market (NEM) and support the safety of emergency responders, device installers and other parties.

Overall, we support the objectives identified by the EMTPT and are of the view that there is merit to an energy storage register. However, it must be supported by a clear policy objective and cost-benefit assessment to ensure it achieves its full potential at least cost. As a Distribution Network Service Provider (DNSP) we consider that access to reliable and up to date data on installed distributed energy devices, including energy storage, would support our core objective of delivering a safe and reliable network at least cost to customers. It would do so by enhancing our ability to more accurately forecast demand and identify opportunities to employ non-network based solutions.

The register would also complement existing information disclosure initiatives under the National Electricity Rules (NER), such as the Regulatory Investment Test for Distribution (RIT-D), the Distribution Annual Planning Report (DAPR) and (the to be updated) Demand Management Incentive Scheme (DMIS). Timely and accurate data on energy storage devices will ensure Endeavour Energy can deploy the most effective non-network solutions for the long term interest of consumers.

We note that most jurisdictions currently require express approval and/or registration of energy storage devices. In NSW this involves the DNSP approving new generation connections to the network and NSW Fair Trading enforcing electrical compliance of installed devices. Whilst these existing mechanisms may be utilised we consider they may be inconsistent and duplicative. Our preliminary view is that a single national register maintained by an independent national body would be the most efficient model and therefore best achieve the National Electricity Objective (NEO).

However, we appreciate it is premature to nominate a particular approach until the scope, objective and funding arrangements of such a register are fully understood. As such, we recommend that the COAG Energy Council task the Australian Energy Market Commission (AEMC) with undertaking a detailed review (either prior to or part of a rule change assessment) to determine the appropriate energy storage policy objective, data collection scope and to conduct a cost-benefit analysis.

Attachment A contains our more detailed response. We would welcome the opportunity to work collaboratively with the EMTPT to enhance this and other energy policy issues.

If you have any queries or wish to discuss this matter further please contact Jon Hocking, Manager of Network Regulation at Endeavour Energy on (02) 9583 4386 or via email at [jon.hocking@endeavourenergy.com.au](mailto:jon.hocking@endeavourenergy.com.au).

Yours sincerely



Rod Howard  
**Acting Chief Executive Officer**