

COAG Energy Council Secretariat  
GPO Box 9839  
Canberra ACT 2601

Dear Sir/Madam

**Cost Benefit Analysis of options to collect and share information about small scale battery storage**

I am writing on behalf of the Energy Storage Council, the peak national body for the energy storage industry, to comment on the COAG Energy Council's Consultation Paper on the Cost Benefit Analysis of options to collect and share information about small scale battery storage.

It is our view that the Cost Benefit Analysis is fundamentally flawed.

It assumes there are only three options available to Governments – no national battery storage register; a register managed by the Australian Energy Market Operator (AEMO); or a register managed by the Clean Energy Regulator.

The Energy Storage Council, together with its partner Global-Roam, is well advanced in developing an industry-led national battery storage register and we urge the COAG Energy Council to support this important measure. We have been working on this important project for almost two years.

The Energy Storage Council believes there is a strong need for a national battery storage register and we remain concerned that the delays with this process mean that governments will have no visibility on the number and location of battery storage systems before the beginning of 2019 at the earliest. By then, it is possible that more than 75,000 battery storage systems may have been installed around Australia.

**Reason for a National Battery Storage Register**

We agree with the consultants Jacobs that a national battery storage register is needed to help improve the power system and network security, and to protect the safety of consumers, line workers and installers.

For the energy storage industry, safety comes first. We do not agree with Jacobs that supporting emergency services is a "secondary objective". It must be the primary objective.

Emergency services need to know if a battery storage system has been installed at a premise when they are responding to a fire, whether or not the fire has anything to do with the battery storage system.

We note that there have been very few incidents worldwide with battery storage systems, but with increased uptake of battery storage on-grid and off-grid, it is possible that house fires and bushfires could occur around premises that have installed battery storage systems.

There are many other reasons for a national battery storage register including, but not limited to, assisting with potential product recalls and life cycle management of battery storage products.

We acknowledge the conclusion of the Finkel Review (the Independent Review into the Future Security of the National Electricity Market) that the energy storage register should be expanded to include all distributed energy resources. This is something we are working through.

### **Energy Storage Council Battery Storage Register Project**

The Energy Storage Council is developing a national battery storage register at no cost to Governments either in developing or maintaining the register. Future beneficiaries would pay for the service. We, and our partners, are taking the commercial and financial risk with this project because we see the urgent need for this register.

We have spent considerable time understanding the need for a register; the potential uses for a register; and the motivations for inputting data into the register. These three elements are critically important to the success of the register.

We believe Jacobs has significantly underestimated the number and types of potential portal users and has seriously underestimated the importance of the register to emergency services.

We continue to stand ready to work with the COAG Energy Council to develop and implement a national battery storage register and we are very confident that we could put a system in place in a much timelier manner than the current COAG process is likely to produce.

### **Battery Finder**

As one component of its National Battery Storage Register project, the Energy Storage Council and Global-Roam has established *Battery Finder*.

*Battery Finder* is now the world's largest catalogue of battery storage products, listing more than 180 battery storage products that are, or have been, available for purchase in Australia.

*Battery Finder* provides comprehensive information on each of the 184 battery storage systems, including size, chemistry, nominal capacity, continuous power, lifespan, operating temperature and humidity. In addition, *Battery Finder* provides full data sheets and warranties for battery storage products.

*Battery Finder* can be found at <http://www.energystorage.org.au/batteryfinder/>

The Energy Storage Council urges the COAG Energy Council to increase the use of *Battery Finder*, by sharing it with key stakeholders and energy market participants.

### **Other matters**

The Energy Storage Council is currently finalising a comprehensive Energy Storage Market Analysis, funded by the Australian Renewable Energy Agency (ARENA). Among other things, the analysis will provide projections on the likely number of battery and energy storage systems to be installed across Australia to 2020. This analysis will be a useful resource for the COAG Energy Council and for the battery storage register project.

We note that Jacobs appears to have overestimated the cost of utilising the infrastructure already put in place by the Clean Energy Regulator in establishing its Small-scale Renewable Energy Scheme Register. The Clean Energy Regulator is a natural partner for a national battery storage register.

The Energy Storage Council would welcome the opportunity to brief the COAG Energy Council on the implementation of its National Battery Storage Register.

Should you wish to discuss these matters further please our Manager of Government relations, Wayne Smith, on 0417 141 812.

Yours sincerely

John Grimes  
Chief Executive  
Energy Storage Council

9 June 2017