

HORIZON POWER RESPONSE TO ESB GOVERNANCE OF DER TECHNICAL STANDARDS CONSULTATION PAPER

General Observations

Horizon Power has the following general observations in relation to the paper.

Horizon Power has done significant work in relation to DER technical standards, and has led the development of standards which have been used across the industry to achieve high levels of DER participation. Horizon Power's experience is predominantly in isolated islanded microgrids, and in microgrids with very high levels of customer DER.

Horizon Power has a number of trials and projects under development which may be of assistance to the DER Standards Governance Committee, specifically the Carnarvon DER and microgrid trials, Broom Smart Sun Trial, and Onslow high DER demonstration project. The Onslow project includes a roll out of DERMS based on the IEEE 2030.5 standard.

Horizon Power notes the critical importance of considering microgrids and islanded networks in the development of standards, and inclusion of networks which are outside the NEM. The standards have a direct impact on our networks, and unique issues associated with microgrids and islanded networks must be addressed.

Horizon Power also notes the role of the Australian Standards committees as being a key component of the governance process. Horizon Power notes the valuable work of the Australian Standards committees in the revision of AS4777.2 which is currently underway. Horizon Power is dependent on the Australian Standards, and other organisations such as the Clean Energy Council, in its management of DER connections and these bodies should be adequately engaged in the process.

Response to Questions

Q1. Do you support the proposal to establish a DER Standards Governance Committee under the National Electricity Rules? If not, what alternative would you suggest?

Yes, noting the importance of Australian Standards and the flow on effect of these standards across the country.

Q2. Do you support the DER Standards Governance Committee being advisory or be determining? Please provide reasons.

For power systems not part of the NEM, Horizon Power believes the Governance Committee should be advisory.

Q3. Do you have any feedback on the proposed functions of the DER Standards Governance Committee?

The DER Standards Governance Committee should work with Australian Standards, Energy Networks Australia, the Clean Energy Council and other relevant bodies for nationally relevant standards. The coordination of various standards would certainly assist the industry.

Q4. Do you have any feedback about the Committee determining standards in a subsidiary instrument under the rules?

Not at this time.

Q5. Do you have any feedback on the development of new compliance and enforcement arrangements for DER technical standards?

Horizon Power is supportive of the development of compliance and enforcement arrangements.

Q6. Do you support the proposed composition of the membership and nature of chair of the Committee? Please provide reasons or nominate alternative arrangements.

The committee should include adequate representation from networks not part of the NEM, and specifically representation from islanded networks and remote microgrids.

Q7. Do you support the proposed terms and selection arrangements? Please provide reasons.

Supported.

Q8. Do you have any feedback on the other elements of the proposed operation of the Committee?

The DER Standards Governance Committee will need to ensure adequate consultation across the country to ensure input from network not connected to the NEM (and specifically islanded networks and remote microgrids) are utilised in the development of standards.