

# Department of State Growth

OFFICE OF ENERGY PLANNING  
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Dr Kerry Schott AO  
Chair  
Energy Security Board

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## **Response to ESB Governance of DER Technical Standards Consultation Paper**

Dear Kerry,

The Office of Energy Planning is pleased to provide feedback on the DER consultation paper.

I am supportive of a coordination function providing a broader compliance-monitoring regime, which will identify gaps in existing arrangements, and develop new processes as needed. However, the consultation paper did not provide sufficient detail in order to assess the questions posed, and allow me to arrive at a considered a position. Therefore, I can only provide high-level comments at this stage.

First, it is important that the role of the Committee be considered in the broader context of the overall governance arrangements. More detail on interactions with existing arrangements such as Standards Australia and the market bodies is required to demonstrate the benefits to customers of this additional committee.

Second, if the Committee will be purely technical, then it is most likely that the deterministic model of the Reliability Panel would be appropriate. If, however, there are any issues of policy that may be included in the scope of the Committee's work, then its role may be more advisory to an existing decision-making body. The proposed membership of the Committee, while having a strong technical focus, suggests that there are broader considerations that will be taken into account.

Finally, whether the Committee is deterministic or advisory, there needs to be an open and transparent approach to consultation to ensure that decisions are robust, and that any regional variations are properly considered and accommodated. If the Committee will be advisory, then the AEMC would best placed to be accountable for outcomes, given that the impacts of any decision could be significant. This will ensure appropriate consultation occurs via an open and transparent process and will provide market certainty.

If you would like any further information, please contact Sharon Raymond, on telephone 03 6166 3489 or ([sharon.raymond@stategrowth.tas.gov.au](mailto:sharon.raymond@stategrowth.tas.gov.au)).

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. Terry', with a long, sweeping underline that extends downwards and to the right.

Sean Terry  
**Executive Director**  
**Office of Energy Planning**

31 July 2020