



20 September 2016

Stuart Richardson  
COAG Energy Council Secretariat  
GPO Box 9839  
Canberra ACT 2601

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

Dear Mr Richardson,

**RE: Energy Storage Registration Consultation Paper**

Origin welcomes the opportunity to respond to the COAG Energy Council's (EC) Discussion Paper on Energy Storage Registration.

Origin believes that further work ought to be undertaken to clarify what information is needed by emergency service workers and how this information may be best conveyed to them. Safety is paramount at Origin and we respect the role of emergency service workers in responding to threats and emergencies. We do not consider ourselves to be in a position to comment on whether a register is the best way of sharing this information to emergency service workers. As part of assessing whether a register is necessary it may be also worthwhile considering other notification solutions that jurisdictions may have. This could include more robust regulations concerning safety and hazard signage and a customer's premise, and ensuring that people reporting an emergency are asked about these risks.

If it is agreed that a register is the most practical and efficient method of servicing emergency workers, then we believe it ought to be administered at a national level so that reporting requirements are consistent. Distribution Network Service Providers (DNSPs) are best placed to report this data to any national register as they are a central body that is aware of when an installation occurs to their network. Only a limited amount of information will be required such as the type of system, its size and capacity, any potentially hazardous chemicals, and the premise location.

Origin does not believe that the energy market extends to activities behind-the-meter and we do not support the provision of this data for a national register. We do not believe that behind-the-meter data is necessary for AEMO to achieve its forecasting role, and that DNSPs do not need a register as they will collect installation data in their own areas whenever systems are connected.

Origin would be pleased to discuss any matters raised within this response with the Commission. Please contact Timothy Wilson (Retail Regulatory Analyst) in the first instance on (03) 8665 7155.

Yours sincerely

A handwritten signature in blue ink that reads "K. Robertson".

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Energy Storage register

*Do stakeholders agree an energy storage register is needed in Australia?*

*Are there any other reasons energy storage data should be collected?*

*Given large-scale energy storage systems are now required to be registered as a Generator under NER, should a register be established for distributed energy storage (less than 5 MW generating capacity)?*

*Do stakeholders agree the Victorian Case Study is an effective framework for storage emergency response?*

Origin accepts that energy storage technologies may present a safety risk to emergency response workers and that it is desirable that they are aware of this risk prior when they respond to an emergency. However, as we are not emergency service representatives, Origin is not in the position to know whether a register is the best method for emergency service workers to obtain this information. Prior to the COAG EC proceeding down the path towards a register, they may wish to seek advice from each jurisdiction's emergency services authorities to understand the systems they currently utilize for dealing with hazards. We note that the Victorian case study suggests that a Triple Zero database may be meaningfully populated by information concerning storage device; however, it is worthwhile assessing other potential solutions that jurisdictions may have. This could include more robust regulations concerning safety and hazard signage and a customer's premise, and ensuring that people reporting an emergency are asked about these risks. Such a solution may be easier to implement, and sufficient from a safety perspective, without creating a register.

However, if a register was deemed to be the most practical manner of managing this risk, then it would probably only need to contain information specifying the type of system, its size and capacity, any potentially hazardous chemicals, and the premise location.

Data and Access

*Given the needs of AEMO, emergency response and other potential users, what is the "must have" data which should be collected? What are the likely costs of this data and do the impacts outweigh benefits?*

*What is the "nice to have" data, and does the cost of this additional data collection merit its collection?*

*How would data be collected and provided to a central register?*

*What arrangements and requirements should be put in place to ensure data is collected and supplied in a timely manner?*

*Could a national register be linked to other databases e.g. data collected by distribution businesses?*

*Are there other databases which should be considered?*

*Beyond AEMO and emergency response providers, what other parties should be able to access the data register and on what grounds? Are there particular conditions which should apply to these users?*

Origin does not support the mandatory collection of additional data by AEMO or other third parties (including DNSPs) for the purpose of monitoring behind-the-meter activities of individual users. Any metering data from distributed generation and storage systems is derived from an agreement between a customer and a supplier of an energy service; it is not an on-market retail electricity contract and we do not believe that the energy market extends to behind-the-meter agreements.

In terms of collecting data for the purpose of network forecasting, we do not believe that energy use data is necessary. Storage systems and distributed generation act as an energy efficiency mechanism for customers by lowering the demand they draw from the grid. In an aggregated sense, customers may reduce their demand for a number of reasons (such as the installation of energy efficient lighting), but we would not expect this data to be collected by AEMO (or DNSPs) for forecasting purposes.

Origin also does not believe that the benefits of providing behind-the-meter data would outweigh the costs of doing so. The collective impact of storage systems and distributed generation may be visible at an aggregate level as a reduction in demand from the grid. Putting aside whether customers would agree to their data being exchanged with the Government, and whether retailers already have proper agreements in place with customers to do so, we expect that providing this data would involve a heavy administrative burden and cost. It is doubtful that the benefits of collecting this data would outweigh the costs given that AEMO already has access to zone substation data and they can infer from the loss of aggregate demand that storage and distributed generation are installed. Similarly, given that DNSPs are aware of any distributed generation or storage systems being connected to the network, we do not believe a registry is necessary to inform them. As we discuss below, DNSPs are in fact the best placed bodies to inform a register when and where a device is connected to the grid.

How the register should be set up

*Do stakeholders agree with setting up a register led by a national body?*

*Are there any other key benefits or concerns that the Energy Council should be aware of for this approach?*

*Can CER, AEMO or a new register be a feasible option? If yes, how can the barriers or challenges discussed be overcome?*

*Are there other organisations suitable to host a national energy storage register?*

*What are stakeholders' views on maintaining information on distributed solar after the scheduled decline in SRES incentives for solar installations from 2017?*

Origin agrees that, if a register was found to be the most effective manner of conveying information about potential hazards, then a national body is more appropriate than state based services. Whilst emergency services are primarily administered at a state level, we believe that a national register is possible because consistent information ought to be required for these purposes. This will enable any bodies with reporting requirements to build a single system within their organization for reporting this information, rather than having to develop individual systems for doing so.

With respect to maintaining information on distributed solar following the conclusion of the SRES scheme, this information has been collected as part of the payment of a subsidy under a government scheme. Some customers may reasonably object to the use of this data for an alternative reason following the expiry of the SRES, particularly when their consent has only been provided for the express purpose of obtaining a subsidy. In terms of future solar customers, for the reasons expressed above Origin does not support the collection of this form of behind the meter data for either storage systems or distributed generation.

A register led by an industry body

*Is an industry-led register a feasible option? Who can lead this register?*

*Are there examples of industry-led initiatives or industry operated schemes that are underpinned by a regulatory framework / minimum regulatory requirements?*

*What are the other benefits and challenges of an industry-led approach?*

Origin believes that any national register ought to be administered by a neutral body that is established for the purpose of maintaining a database. The COAG EC has suggested a broad range of possible purposes for a registry but until agreement is reached on what it will be used for, and the data it is likely to collect, then responsibility for administering it cannot be determined.

In terms of industry bodies or associations, these primarily exist to serve members' interests, whereas the proposed registry would most likely serve interests that extend beyond the energy industry (namely emergency services). Additionally, an industry association can also be discontinued or restructured by agreement of the members. If this were to occur for an unforeseeable reason then the registry would need to be administered by another agency. For these reasons, we believe that an industry body is not appropriate for assuming the responsibility of maintaining a registry.

State-based registers  
*Is a state-based energy storage register a feasible option?  
Are there other organisations (apart from electrical safety regulators) that can host this register?*

As we have stated above, Origin believes that a single national body is the most appropriate mechanism. Whilst we appreciate that states may have their own way of deploying emergency services information, we believe that the fundamental data that is required for a registry (namely type, capacity, specific location, and any potentially hazardous chemicals) is not jurisdictionally specific. We believe that it would be ideal if state-based emergency services used the registry to maintain their databases rather than requiring reporting to be tailored to each state.

Current practice undertaken by distribution businesses  
*Are there opportunities to leverage data collection under other frameworks into a national register?  
Should relevant jurisdictional licensing frameworks be reviewed and amended to require registration of energy storage devices? Are there other alternatives?  
It is understood that off-grid distributed generation, including energy storage, is not currently captured under both national and state/territory registration frameworks. Should consideration be given to registration of off-grid storage systems for emergency purposes or other uses?*

As the Issues Paper notes, DNSPs may in fact approve the connection of energy storage as it is part of them managing the integrity of the network. It is likely that a customer's DNSP will be aware that either distributed generation or a storage system has been connected to its network. We therefore believe that DNSPs are the best placed entity for advising any register of connections to the network when they occur.

Origin agrees that off-grid storage systems should be registered for emergency service purposes. From the perspective of first responders to emergency incidents, being on or off-grid is irrelevant to whether there is a potential hazard present at a premise.