

Energy Policy WA
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Lodged via email to epwa-submissions@deed.wa.gov.au

18 August 2026

Subject: Submission to the Issues paper on connections and data quality for distributed energy resources

1. Introduction

The Australian Energy Council (**AEC**) welcomes the opportunity to provide this submission to Energy Policy WA in response to the Issues paper on connections and data quality for distributed energy resources (**the Issues Paper**)

The AEC is the peak body for energy retailers and generators operating in competitive markets. Our members generate and sell energy to over 10 million homes and businesses and are committed to delivering a reliable, affordable and decarbonised energy system for consumers. The AEC supports net zero by 2050 and recognises the electricity sector's role in reducing Australia's emissions. Our members are major investors in renewables, firming and storage technologies that are critical to ensuring that customers continue to receive reliable and sustainable energy supply as we navigate the energy transition.

The Issues Paper states that "Better information benefits all electricity users". While we understand the logic of this statement, we caution against extrapolating from this view that *all* informational obligations on market participants and other service providers have a net benefit. Regulatory burdens have the potential to reduce competition, increase costs and stifle innovation. The net benefits cited in the Issues Paper¹ are based on broad modelling of high levels of orchestration. Orchestration – appropriately – remains optional for DER owners and so even where initiatives are aimed at supporting higher levels of orchestration, policymakers should not *assume* that these initiatives will deliver the modelled benefits.

This caveat notwithstanding, the AEC is broadly supportive of the principles and proposals set out in the Issues Paper, noting that they require further development into specific rules and protocols for implementation. We recognise that the proposals lean more towards utilising existing processes to gather data in the first instance. They also strike an appropriate balance between the value of national-level co-ordination versus recognition of WA's specific context. Below we set out some specific comments on the individual proposals.

Reform proposal 1: Require inverters up to 30 kVA to be CSIP-AUS (v1.2) enabled to support interoperability of DER devices

This proposal appears to appropriately leverage the national communications standards and is consistent with developments in other jurisdictions. Some service providers operate on a national scale,

¹ For example, in section 2.3

and so, to the extent that interoperability is to be mandated, it is efficient to implement the same standards across Australia.

Reform proposal 2: Establish distribution system operator (DSO) functions to collect, validate, and share data

The AEC considers there is an opportunity to utilise data collection and dissemination processes to streamline customer take-up of DER and DER-related offerings such as virtual power plants (VPPs). Members have observed that customers are often not well placed to provide accurate technical specifications of their existing DER or of their electricity use more generally. With an appropriate consent protocol in place, customers could allow potential service providers to access relevant information on their electricity use and existing DER and appliance installations (a customer DER profile) in order to be able to offer them products and services that suit that customer's circumstances. This would support the efficient take-up and operation of new DER and reduce transaction costs. Accordingly, we consider that the data functions of Western Power should be designed to (among other requirements) be capable of providing such data to customers or to third parties under an informed consent process.

Reform proposal 3: Indirect data collection for electric vehicle chargers (levels 2/3)

We support the collection of EV charging data, and the intent to minimise the costs and regulatory burden entailed in collecting such data. However, the data collection and how it is shared must also be fit for purpose, and we consider it should be integrated into the customer DER profile and informed consent protocol canvassed under proposal 2.

Reform proposal 4: Standardised data to create an easier connection pathway

We support greater use of standardisation to streamline connections. Commercial customer-level DER has scope for greater growth than household level, given it is starting from a lower baseline, and an easier connection pathway would facilitate this growth.

Reform proposal 5: Requirements to share network capacity

Network visibility is a useful tool for market participants and other service providers in the DER sector. This includes both an understanding of where constraints are (to inform opportunities to relieve those constraints) and where they are not (to inform opportunities for DER growth in areas of the network with low utilisation). A relatively low level of granularity – i.e. feeder level from a network perspective and/or street level from a customer perspective is most useful, and generally avoids the privacy issues that would be entailed if data were publicly available at a meter-by-meter level (NMI). There may need to be privacy protocols in place in cases where feeder level data would effectively identify the characteristics of an individual customer. We agree that both historical and forecast data are relevant to stakeholders' understanding of network opportunities.

Reform proposal 6: Explore mechanisms for VPP operators to provide simple capacity data

We consider this proposal to be reasonable, and look forward to working with EPWA on further development of such mechanisms, including consideration of the pros and cons of establishing a participant class of VPP operators who can register under the alternative energy services framework, and who then may be required to provide simple capacity data.

Reform proposal 7: Tie Western Power requirements to share network capacity information with VPP opportunities

The AEC supports this proposal in principle, subject to clarification about the level of granularity at which data is collected and shared. We consider that privacy concerns mean it remains inappropriate to *publish* data at a NMI level, in contrast to accessing such data under informed consent by the customer at the NMI (as discussed above). We consider that the level of granularity proposed for greater visibility of network capacity under proposal 5 is appropriate.

Please do not hesitate to contact me at jo.desilva@energycouncil.com.au or by telephone on 03 9205 3100 if you wish to discuss our submission further.

Yours sincerely,

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