



Level 45  
152 St Georges Terrace  
Central Park  
Perth WA 6000

**Postal address**  
PO Box 7096  
Cloisters Square  
Perth WA 6850

**T** 08 9469 9800  
**E** [info@aemo.com.au](mailto:info@aemo.com.au)

17 August 2026

Mr Kieran Rayney  
Director, Electricity Network Regulation  
Energy Policy WA  
[epwa-submissions@deed.wa.gov.au](mailto:epwa-submissions@deed.wa.gov.au)

Dear Mr Rayney

**Making it easier to connect solar, batteries and EV chargers – Issues Paper on connections and data quality for distributed energy resources**

Thank you for the opportunity to provide a submission on the Issues Paper – Making it Easier to connect solar, batteries and EV chargers (Issues Paper).

AEMO supports the intent of the Issues Paper and its seven reform proposals, which are consistent with the objectives of Energy Policy WA's Distributed Energy Resources (DER) Roadmap and Project Jupiter.

While the implementation pathway for Western Australia differs from national arrangements, the proposals support the underlying objectives of improved DER interoperability, stronger compliance outcomes, better DER data quality and more efficient DER connections. They also represent an important step towards enabling higher levels of consumer energy resources while supporting efficient network and market outcomes and maintaining power system security and reliability.

AEMO considers that clear governance, defined roles and responsibilities, proportionate compliance arrangements and alignment with existing DER Register obligations are essential to delivering efficient end-to-end DER connection outcomes and benefits for customers, industry and the power system.

AEMO's feedback is provided in Attachment 1.

AEMO welcomes continued engagement with Energy Policy WA (EPWA), Western Power, Synergy and industry stakeholders on the detailed design and implementation of the proposed reforms.

If you would like to discuss any of the matters raised, please contact Alex Gillespie, Acting Manager WA Regulatory Affairs at [alex.gillespie@aemo.com.au](mailto:alex.gillespie@aemo.com.au)

Yours sincerely

Signed by:

*Kirsten Rose*

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Kirsten Rose

**Executive General Manager WA**

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Australian Energy Market Operator Ltd ABN 94 072 010 327

## Attachment 1: AEMO's Feedback

### Question 1: Do you have feedback on the seven proposals?

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

AEMO supports Reform Proposal 1 and the objective to require inverters up to 30 kVA to be CSIP-AUS enabled. A clear requirement in the Electricity System and Market Rules (ESM Rules) would support DER interoperability, compliance and the roll out of nationally consistent standards across the SWIS.

However, AEMO recommends removing the CSIP-AUS version reference from the proposal so the latest applicable standard can be considered at implementation, noting the standard continues to evolve.

AEMO also recommends continued consideration of the broader work being undertaken as part of the National CER Roadmap<sup>1</sup>, which recognises CSIP-AUS capability is only one part of a broader DER interoperability chain.

#### Reform Proposal 2 – DSO functions to collect, validate and share data

AEMO supports Reform Proposal 2 which aims to improve the quality, consistency and availability of DER data in the SWIS. A key gap in the current framework is the lack of clear obligations on the Network Operator to collect, validate, maintain and demonstrate compliance with primary DER data requirements before the data is provided to AEMO. This affects the quality of information held in the WA DER Register and AEMO's public DER Register dashboard<sup>2</sup>.

As the DER Register supports operational needs, aggregated public reporting, and regulatory data provision to the Coordinator and Economic Regulation Authority (ERA), it is essential that these gaps are addressed to ensure DER data is complete, accurate, timely and validated.

AEMO and consider that any obligations to address these gaps should be in addition to and in support of Section 3.24 of the ESM Rules to align with AEMO's DER Register functions and governance.

#### Reform Proposal 3 – Indirect data collection for electric vehicle chargers

AEMO supports this proposal and the use of existing processes where practicable, including electrical safety certificate processes, to improve the visibility of Level 2 and Level 3 Electric Vehicle (EV) charger installations while minimising consumer impacts. The proposal complements Reform Proposal 2 by enhancing the quality of available information and would improve data published on AEMO's DER Register dashboard, which has been modified to accommodate EVSE as a new and emerging DER inverter and device type.

#### Reform Proposal 4 – Standardised data to create an easier connection pathway

AEMO supports the development of a standardised DER data set for business customer connections. This would improve upstream connection information and support efficient information sharing throughout the connection process, improving the customer experience, compliance outcomes and DER installation accuracy, while improving the useability of DER data for system planning, forecasting and support existing investments in the DER Register.

<sup>1</sup> National CER Roadmap Consultation on Technical Priorities <https://consult.dcccew.gov.au/natl-cer-roadmap-tech-priorities-consult>

<sup>2</sup>AEMO public DER Register dashboard in aggregate: <https://www.aemo.com.au/energy-systems/electricity/der-register/data-der/data-dashboard-wa>

#### Proposal 5 - Requirements to share network capacity, and Proposal 7 - Tie Western Power requirements to share network capacity information with VPP opportunities

AEMO supports Reform Proposals 5 and 7, which seek to improve the sharing of aggregate network capacity information. Greater visibility of forecast and historical distribution network capacity will improve transparency and support future investment opportunities.

As Dynamic Operating Envelopes mature, AEMO also recommends including aggregate capacity information at the locational transmission node level, to support forecasting, planning, system security assessments and a better understanding of distribution network constraints and opportunities.

AEMO recognises the importance of data sharing arrangements appropriately addressing any customer privacy and related implications. Similar requirements have been addressed under the ESM Rules, which outlines the way AEMO must aggregate locational information through the WA DER Register to protect confidentiality and privacy in public reporting.

#### Proposal 6 Explore mechanisms for VPP operators to provide simple capacity data

AEMO supports further exploration of mechanisms for Virtual Power Plant (VPP) operators to provide simple capacity data, including the proposed concept of controllable VPP capacity.

AEMO considers data sharing arrangements should balance the benefits of increased visibility with implementation impacts. A staged approach could support data-sharing arrangements by enabling priority use cases to be addressed first, while retaining flexibility to refine requirements as operational experience and industry capability mature. This approach should recognise that information needs may vary depending on the nature of the VPP service or participation model. Project Jupiter provides an important initial pathway to improve understanding of VPP visibility and predictability data requirements and will further support forecasting and planning functions and enhance situational awareness for system operations.

#### Questions 2,3,4 and 5

In response to questions 2, 3, 4 and 5, AEMO supports improving DER connection processes for customers and industry stakeholders. This aligns with Western Power and Synergy's work to redesign DER connection processes for non-contestable customers in the SWIS, and AEMO's feedback through comparative National CER Roadmap activities. AEMO considers that clear processes to clarify roles and regulatory obligations across the CER value chain are essential to support efficient and effective end-to-end DER connection outcomes and encourage innovation as CER uptake accelerates.