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Energy Policy WA
Locked Bag 100
East Perth WA 6892

EPWA-Submissions@deed.wa.gov.au

Issues paper on connections and data quality for distributed energy resources

Alinta Energy is pleased to provide comment on EPWA's issues paper, which sets out seven reform proposals across three key principles which together aim to improve data quality and availability for distributed energy resources (**DER**) in the SWIS.

We support simple reforms with low technical complexity and cost that will provide benefits to WA households and businesses through improved forecast accuracy, deferred network upgrades and lower-cost flexible DER services. As noted in the issues paper, simpler reforms should be more readily achievable in WA than in the NEM because the SWIS is structurally simpler and has far fewer participants. Any proposed reforms should maximise this significant advantage, ensuring WA continues as a global leader in DER utilisation.

Alinta Energy broadly supports the reform package. We support proposals 1 to 6, which are practical, low-complexity measures to improve DER data quality, streamline connections and build a better understanding of Virtual Power Plant (**VPP**) capability. Our only substantive concern is with proposal 7, to the extent it would provide information at a NMI level. In our view, that information should remain confidential to protect customers who have chosen not to participate in VPP arrangements from targeted marketing by aggregators.

Our comments on each of the proposed reforms are provided below.

Principle 1: Increasing DER standing data quality

Reform proposals 1 to 3 seek to increase the quality of DER standing data by leveraging CSIP-AUS technologies, leading to improved collection of data and raising the visibility of EV chargers.

Reform proposal 1: We support this proposal, which requires solar inverters up to 30 kVA to be CSIP-AUS enabled. A standardised communications solution for integrating large volumes of consumer energy resources, including for VPP orchestration, emergency backstop measures and export management, is preferential to a fragmented approach to communication interfaces and control mechanisms which will prove higher-cost in the long-run.

Reform proposal 2: We agree with the proposed new obligations for Western Power to collect standing data at the point of DER installation. Noting that Western Power would be required to set out standing data requirements in a WEM Procedure for consultation, we consider the data fields set out in AEMO's DER Register to be a good starting point and make the observation that the DER Register is structured with three data levels so that it can receive and store the characteristics of diverse DER.

Reform proposal 3: We endorse the proposal to improve EV supply equipment data collection for level 2 (AC) charging systems, so that data provided by Western Power to AEMO under the existing DER Register requirements is more robust. We agree that tapping into the existing level 2 installation process is a cost-effective way of capturing better data about the proliferation of new EV chargers.

Alinta Sales Pty Ltd ABN 92 089 531 984

PO Box 8348, Perth BC, WA 6849

T +61 8 9486 3170 **F** +61 8 9266 4688 **W** alintaenergy.com.au

Principle 2: making it easier for businesses to connect DER

Reform proposals 4 and 5 will, if implemented, simplify data requirements to create an easier connection pathway for larger DER and increase the visibility of network capacity.

Reform proposal 4: We support the removal of so-called “soft” barriers, such as protracted multi-step application processes for larger, but routine, DER installations. Extending CSIP-AUS communications to commercial solar would standardise data collection requirements, leading to a simplified connections process.

Reform proposal 5: We agree that sharing more information about Western Power’s network capacity at an aggregate level will assist maximise DER opportunities through better understanding of network functionality.

Principle 3: Better understanding how VPPs mitigate grid impacts and maximise consumer opportunities

The final two reform proposals aim to better quantify the contribution of VPPs to reducing peak demand on the grid.

Reform proposal 6: We agree that the provision of basic VPP data would be useful in understanding the value of aggregated consumer energy resources. Noting there are currently no regulatory mechanisms for requiring VPP operators to supply this information, we would support exploring options including registration of VPP operators under the Alternative Electricity Services framework.

Reform proposal 7: Western Power’s interactive network opportunity map provides a useful overview of network support services opportunities. We do not support the provision of information at a NMI level; despite the requirement for customers to opt in to VPP participation to receive a rebate under the WA Residential Battery Scheme, many customers are electing not to participate, citing a preference to coordinate their own energy resources. The details of non-VPP connection points should remain confidential to protect these customers from becoming the targets of endless marketing by VPP aggregators.

We would welcome the opportunity to discuss our comments further with EPWA.

Yours sincerely

Catherine Rousch

Manager WA Retail Regulation

Alinta Energy