

17 August 2026

WA Department of Energy and Economic Diversification
Lodged by email to epwa-submissions@deed.wa.gov.au

DER Data and Connections Reform Issues Paper

Change Energy welcomes the opportunity to provide feedback on DEED's Issues Paper on Connections and Data Quality for Distributed Energy Resources. We support the overall direction of the proposed reforms and agree that improving DER data quality, visibility and accessibility will be critical into the future.

Proposal 1

Require CSIP-AUS for Inverters up to 30kVA

Change Energy supports the proposed requirement for inverters up to 30kVA to be CSIP-AUS v1.2 enabled.

Any consideration of extending the requirement to up to 200kVA needs further review to allow a reasonable lead time for the development systems to integrate with the larger inverters.

Proposal 2

DSO Functions to Collect, Validate and Share Data

Change Energy strongly supports establishing formal obligations for Western Power to collect, validate and share DER data. This information should be included in Standing Data for all NMIs and made available to all market participants.

Change Energy believes that the collection of data should be extended to include operational data from AEMO regarding the registration of NMIs in DSPs. Change Energy has significant concerns regarding the changes in Appendix 5 of the ESM Rules where Metered Energy for a meter is adjusted to account for Dispatch Instructions, if it is an Associated Load of a DSP. Not having this information will create significant issues for both pricing and billing of customers.

Proposal 3

Indirect Data Collection for EV Chargers

Change Energy supports improving visibility of Level 2 and Level 3 EV charging infrastructure through existing installation and electrical certification processes.

Change Energy believes that the process should go further to include new technical requirements on EV charging to be CSIP-AUS v1.2 or Open Charge Point Protocol enabled. It would be much more prudent to do this now rather than waiting until there are large numbers of EV chargers on the grid. It does not make sense to require

solar and batteries to have CSIP-AUS v1.2 enabled but then allow a potential 22KW load to be uncontrolled – especially at times when control is enacted on batteries for peak demand events.

Change Energy would support a Western Power application process for the connection of Level 2 and above chargers so that the data is properly collected and the suggested new technical requirements are adhered to by installers. Change Energy does not believe that the use of electrical safety certificates would provide sufficiently accurate data.

Proposal 4

Standardised Data and Easier Business Connections

Change Energy strongly supports measures to simplify and standardise the connection process for commercial and industrial DER installations. This is especially important given the federal government's expansion of the SRES to systems up to 1 MVA.

Many businesses continue to experience lengthy and complex connection processes that can delay investment in solar, batteries, electrical upgrades and new connections.

Proposal 5

Network Capacity Transparency

Change Energy supports greater publication of distribution network capacity information. We support publication of both forecast and historical network capacity information through accessible digital tools.

It has been our experience that significant gaps remain between Western Power's mapping/capacity tools and the customer-specific information available through Standing Data. As an example, where some of the mapping tools provide feeder-level information, there is no way to determine which NMIs are located on that feeder using the information currently provided in Standing Data.

Proposal 6

VPP Capacity Reporting

Change Energy supports further exploration of mechanisms that provide visibility of VPP capability and contribution to the power system.

Change Energy has concerns regarding putting additional obligations on market participants to report on controllable capacity. As an electricity retailer, there is very limited visibility of what equipment a customer has installed and how that equipment is operated.

Change Energy believes more accurate reporting and analysis would come through better data collection and sharing as stated above. If that data was accurate and available, detailed analysis could be done to understand customer behaviour at both micro and macro levels to maximise the opportunities that could be delivered.

Proposal 7

Network Opportunity Information and VPP Development

Change Energy supports further development of network opportunity mapping and spatial planning tools. As stated in our response to Proposal 5, there are significant gaps between tools such as iNOM and the Standing Data available for customer NMIs. There should be no privacy issues in updating Standing Data with feeder level information.

Conclusion

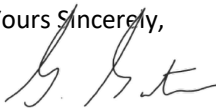
Change Energy generally supports DEED's proposed reform package and believes the proposals represent an important step toward integrating DER as a core component of the WA electricity system.

However, we believe there has been insufficient consultation with electricity retailers other than Synergy. In our experience, most industry forums are focused primarily on Synergy's relationship with DER VPPs and how those arrangements will interact with the wider market.

There appears to be a limited understanding of the contractual arrangements between business customers and electricity retailers, and how DSPs and VPPs may affect those arrangements. Change Energy would welcome the opportunity to discuss these issues further.

If you have any questions or would like to arrange a meeting to discuss our submission, please contact me on 0401 903 210 or at Geoff.Gaston@changeenergy.com.au.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "G. Gaston", written over the typed name.

Geoff Gaston

CEO