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Dr Stuart Johnston
General Manager, Network Transformation
Energy Networks Australia
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Sent electronically: sjohnston@energynetworks.com.au

Dear Dr Johnston

ENA draft National Connection Guidelines

EnergyAustralia welcomes the opportunity to make this submission to Energy Networks Australia (ENA) on its draft National Connection Guidelines for basic micro and low voltage (LV) embedded generation connections. EnergyAustralia is one of Australia's largest energy companies with around 2.6 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. We also own, operate and contract an energy generation portfolio across Australia, including coal, gas, battery storage, demand response, wind and solar assets, with control of over 4,500MW of generation in the National Electricity Market (NEM). EnergyAustralia is also a member of the Australian Energy Council.

EnergyAustralia offers a number of distributed energy resources (DER) products to our customers including solar power and battery storage. We are involved in designing a solution for customers, sale of solar panels, inverters, battery storage, and full installation. EnergyAustralia offers several products to suit different energy needs and budgets. We are also a Clean Energy Council approved solar retailer and work closely with distribution businesses nationally to assist customers to navigate technical connection processes.

We are pleased that ENA has taken the step to publish a set of consistent technical guidelines, and agree that it would be a positive, customer-focused step forward to providing and simplifying technical information to customers and any other relevant users consistently across distributors. Our view is that the best outcome would be if the guideline was adopted by all distributors with minimal deviations, and deviations only made where necessary due to regulatory requirements (e.g. jurisdictional regulations).

Initial conversations on products often occur between customers and frontline staff of both retailers and distributors who may have limited technical knowledge. A simple, detailed and consistent set of information greatly enhances a positive customer experience through a more efficient and streamlined process of application and connection.

EnergyAustralia encourages the guideline to go further to include consistent timeframes and expected service levels for response times, connections timeframes, and application assessments. These should be provided in a consistent and easy-to-understand manner.

Consistent interpretation and standards on export limitations, system capacity and storage limits when connecting energy storage system (ESS) technology (e.g. inverters, batteries) should also be articulated in greater detail, specifically for how export limitations might change when multiple components of an ESS are connected.

The guideline also refers to technical standards such as Australian Standard 4777 (Grid connection of energy systems via inverters). While we agree that this is appropriate, these documents are not easily accessible by customers, especially residential customers, as they require subscription. We suggest that simplified summary information be provided where relevant to aid customers in understanding the documents that are being referenced.

If you would like to discuss this submission, please contact Shawn Tan at +61 3 8628 1512 or Shawn.Tan@energyaustralia.com.au .

Yours sincerely

Sarah Ogilvie
Industry Regulation Leader