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Dear Stuart,

### **ENA draft National Connection Guidelines ENA DOC 039-2019**

The Australian Energy Council welcomes the opportunity to make a submission to the ENA National Connection Guidelines draft and the recommendations contained therein.

The Australian Energy Council (AEC) is the industry body representing 21 electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. These businesses collectively generate the overwhelming majority of electricity in Australia and sell gas and electricity to over 10 million homes and businesses.

The AEC recognizes the role that the grid connection guidelines may take in both streamlining the consumer connection experience and facilitating efficient investment in the grid of the future. Our view is that guideline should adopted by all distributors with deviations made only where required by jurisdictional requirements.

Our main concern with the guidelines themselves is to ensure better outcomes for customers seeking to realise the full benefit of their DER additional clarity, particularly in relation to battery energy storage systems (ESS), is still required.

#### **Establishing an effective national connections framework**

Ideally the guideline would include timeframes for the assessment of applications and connections as different network application processes applied across different distribution zones have frustrated customers. To customers, and to suppliers of DER and ESS, the distribution zone boundaries are largely arbitrary and the guideline could address the current problems this creates for customers through:

- enabling customers to connect new DER consistently, and with ease across distribution zones;

- aligning with current Australian Standards to ensure consistent technology practice and allow for technology advancements into the future, and;
- establishing appropriate resolution processes for customers and market participants to challenge network connection settings that would result in sub-optimal customer outcomes.

Detailed standards on export limitations, system capacity and storage limits when connecting energy storage system (ESS) technology (e.g. inverters, batteries) should also be published in a readily accessible form. These should be interpreted consistently, and should also address how and why future export limitations might change.

Any questions should be addressed to David Markham by email to [david.markham@energycouncil.com.au](mailto:david.markham@energycouncil.com.au) or by telephone on (03) 9205 3107.

Yours sincerely,

**David Markham**  
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