



South Australian Metropolitan Fire Service response to the Energy Security Board Data Strategy Consultation Paper

Question 24: DER identification and DERR

Are there appropriately clear mechanisms to expand and evolve DERR coverage over time?

Are there priorities in DERR data which need to be addressed?

Are the gaps in DER data not captured in DERR of concern?

My name is Melanie D'Ambrosio, I am the Senior Scientific and Environmental Officer for the South Australian Metropolitan Fire Service (MFS) and I would like to provide comment to the Energy Security Board on the Data Strategy Consultation Paper, October 2020, specifically on the Distributed Energy Resource Register (DERR).

South Australia leads Australia in growing its renewable electricity generation. There are almost 11,500 battery energy storage systems (BESS, or ES) installed in South Australia (*information provided by SA Department for Energy and Mining on 27/10/2020*). This is the highest number of installations of any state or territory within Australia. There are several government rebate and stimulus initiatives that are making energy storage systems accessible, such as the Virtual Power Plant and the Home Battery Scheme, resulting in an increased rate of both residential and commercial installations.

One-in-three homes in South Australia have rooftop solar (or PV system) installed. As at March 2020, there were more than 275,000 PV systems installed in South Australia (*information provided by Australian Energy Market Operator*).

To provide the basis for safe systems of work for MFS Firefighters when attending an incident where PV system and/or BESS are present, an Alternative Energies Standard Operational Procedure (SOP) has been developed. The MFS procedure was developed and based on research conducted by MFS Commander Rob Fraser and myself, in consultation and collaboration with many agencies and experts in the field.

During the development of the MFS procedure, it was determined that having a manifest which identifies where BESS's are installed would be a huge advantage in pre-planning and responding to incidents. Through my research, I discovered the Australian Energy Market Operator (AEMO) are the custodians of the DERR which would be able to provide the MFS with information such as:

- Address of installation
- Classification (e.g. residential, commercial etc)
- Device type (e.g. solar, battery etc)
- Device details (e.g. make, manufacturer etc)
- Status (e.g. active, inactive, decommissioned)

An incident, whether it be a fire, piercing or crushing incident (e.g. a car accident) that involves a BESS has the potential to be hazardous and very difficult for fire crews to manage. Having access to this information would enable the MFS to respond appropriate appliances, quickly identify locations and facilities that have BESS installations, identify the types of installations present, as well as have access to the manufacturer and installer details. This information would also assist local crews when they are conducting area familiarisation visits, to pre-plan by identifying potential risks at a site.



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I met via teleconference with AEMO representatives on 5th May 2020 to explain the MFS position and AEMO were very understanding. AEMO determined that a Memorandum of Understanding (MOU) was required between AEMO and the MFS before access to the DERR would be granted. After multiple email requests and phone calls, to this date, a MOU has not been provided to the MFS nor access to the DERR.

The MFS have contacted SA Power Networks as well as the Clean Energy Council (CEC), both of which directed the MFS to AEMO for access to this information. The CEC have been very supportive in our endeavours to obtain access to the DERR.

All Emergency Service Agencies throughout Australia are in the same position as the MFS, and so rather than having each individual State/Territory needing to develop their own MOU with AEMO, which is extremely time consuming, the Australasian Fire and Emergency Service Authorities Council (AFAC) have stepped in to try to develop one MOU with AEMO for all Emergency Service Agencies. This has been unsuccessful at this point.

It is noted that the Australian Energy Market Commission, 'Rule Determination; National Electricity Amendment (Register of Distributed Energy Resources), 13 September 2018' allows AEMO to provide the DERR to Emergency Services Agencies if requested.

Thank you for the opportunity to provide comment.

Kind regards,

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