

22 September 2016

COAG Energy Council Secretariat
GPO Box 9839
Canberra ACT 2601



By email: energycouncil@industry.gov.au

Dear Energy Market Transformation Project Team

Energy Storage Registration Consultation Paper

The Public Interest Advocacy Centre (PIAC) welcomes the opportunity to comment on the Energy Storage Registration Consultation Paper.

PIAC agrees that an energy storage register should be established so that relevant authorities and organisations have access to critical data to fulfill their regulatory obligations. PIAC supports the reasons put forward by the working group to justify the register, that is, on the basis of power system planning and operation, emergency response and safety and industry integrity. We also consider that the establishment a register is time-critical if it is to be effective and avoid the complexity that would ensue from the retrospective collection of the required information in the context of a rapidly evolving market.

PIAC supports the arguments advanced by academic and lawyer, Dr Penelope Crossley, from the University of Sydney. Dr Crossley notes that the lack of accurate data within the sector is problematic and that a number of risks associated with market design, system reliability and planning, fire risk management, and product recalls could be better managed if reliable data was publicly available through a national register for stationary energy storage.¹

We acknowledge the expertise of Dr Crossley in this area and support her recommendations. In particular, from a consumer perspective, PIAC agrees with the need for a national energy storage register to support compulsory product recalls and to ensure end-user safety. As referenced in her submission, and elucidated in a previous article on the subject, Dr Crossley explains that:

The effectiveness of compulsory recalls is dependent on the traceability of goods so that affected consumers may be contacted. Without a national register, affected consumers may not be aware of the existence of a recall, especially if their supplier or installer fails to keep proper records or goes out of business.²

More broadly, PIAC supports Dr Crossley's contention that the working group should consider a wider range of benefits of the register including:

- end-user safety and product recalls;

¹ Dr Penelope Crossley, *Submission on the Energy Storage Registration Consultation Paper*, 20 September 2016.

² Penelope Crossley, 'Is it time to establish a national register for stationary energy storage?' (March 2016) 34(1) *Energy News Journal* 18

- the safety of other personnel who may need to work on the device or on the electrical wiring of the property (i.e. non-emergency responders);
- system security;
- recycling at end-of-life and the discouragement of the dumping of hazardous waste; and
- improved competition.

PIAC also notes that there may be significant privacy issues that need to be addressed in the establishment of the register, but acknowledges that the working group has indicated that they are not within the scope of this consultation. Regardless, PIAC is particularly supportive of consumers having a right to access their own information through an established administrative scheme, in line with basic principles and rights of access to information that concerns them, and particularly of course, their own personal information.

We attach Dr Crossley's submission here and support the recommendations contained therein.

If you would like to discuss PIAC's submission further, please contact Tina Jelenic, Senior Policy Officer, Energy + Water Consumers' Advocacy Program, on (02) 8898 6522 or by email at tjelenic@piac.asn.au.

Yours sincerely



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