Dear Energy Innovation Toolkit team,

Thank you for the opportunity to contribute to the consultation on Essential Energy's islandable microgrids trial waiver application.

Please accept the following public submission from Corey Foggo, developing Mycelium Resource Intelligence, an early-stage evidence and provenance prototype. My comments concern evidence design and accountable review. The prototype has not been validated in live electricity operations; I do not represent a network operator or participating community.

Recommendation: make each material islanding event reconstructable, and use the same evidence for regulatory and funding reports.

The application already describes reporting and ARENA knowledge-sharing arrangements. I recommend a common minimum event record that can feed these existing processes, rather than requiring another standalone reporting system or a particular software supplier.

1. **Connect the event to its deployment.** Retain a stable deployment and event identifier, the configuration and relevant waiver version, accountable operator, operating-state changes and timestamps, intended service and observed service. Apply recording effort proportionately; detailed review should prioritise material failures, exceptions and customer impacts.

2. **Show whether a claimed benefit is evidenced.** Separate measured energy and service continuity from estimated avoided interruption. Record the comparison method, assumptions, observation period, missing telemetry and uncertainty. Preserve underperforming events as well as successful ones. An estimated counterfactual should remain visibly an estimate.

3. **Assign exceptions and protect customers.** Link material metering, settlement, communications or performance exceptions to an accountable reviewer, action, due date and closure evidence. Include how customer concerns were resolved, with particular attention to vulnerable and life-support customers. Public reporting should use safe aggregates; household identifiers, health information and security-sensitive operating detail should be restricted to authorised users.

4. **Keep reviews current.** When ownership, operating responsibility, configuration, supporting measurements or assumptions change materially, identify the affected decisions and record whether renewed assessment is required. Retain the prior version, the reason for the change and human sign-off.

5. **Plan the exit before it becomes urgent.** Maintain a deployment-specific transition record with an accountable owner, unresolved approvals, continuity arrangements, proposed allocation of transition costs and evidence of readiness for the applicable enduring framework. Report unresolved dependencies rather than assuming future arrangements will be available.

These recommendations are intended to support comparisons across delivery models while keeping reporting proportionate and reusable. They do not propose that an evidence tool should authorise switching, protection settings, dispatch or reconnection. Operational authority and technical safety remain with appropriately authorised specialists.

The practical outcome should be that an authorised reviewer can trace a claimed customer benefit to the observations and decisions behind it, identify what remains uncertain, and verify whether promised corrective actions were completed.

Source reviewed: the AER consultation notice dated 30 September 2026 and its attached application, including the proposed monitoring and reporting arrangements.

This submission may be published with my name. Please omit my personal contact details from any published copy. I would appreciate confirmation of receipt.

Kind regards,
Corey Foggo
Mycelium Resource Intelligence
[redacted]