



Submission by

Alternative Technology Association

on the

**Review of National Framework for
Electricity Distribution Network Planning
and Expansion (EPR0015 ~ Draft Report)**

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By Email to: submissions@aemc.gov.au

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1. Introduction

The Alternative Technology Association (ATA) welcomes the opportunity to provide comment on the Draft Report for the Review of the National Framework for Electricity Distribution Network Planning and Expansion. Our response to the EPR0015 – Draft Report follows.

ATA is a not-for-profit organisation established in 1980 to empower our community to develop and share sustainable solutions for the way we live and to promote the uptake of sustainable technologies in order to protect our environment. The organisation provides service to over 5,000 members, who are actively promoting sustainability in their own homes by using good building design, energy efficiency and renewable energy technologies.

2. Response to Annual Planning Process recommendations

2.1 Subsequent to the August 5 Draft Report Forum in Melbourne, ATA are concerned that some DNSPs seem opposed to a number of the draft report's DAPR/DSES recommendations - specifically, those which would require DNSPs to undertake additional functions and tasks - on the basis that they see the cost of compliance as burdensome.

As DNSP's effectively pass through their costs, and operate within the relative security of a monopoly, ATA feel that this position should only be given consideration, in the context of this consultative process, where DNSPs can demonstrate that any additional costs would not be fairly passed through by the normal mechanisms.

2.2 Each DNSP would be required to use reasonable endeavours to engage with non-network proponents and consider non-network alternatives.

Each DNSP would be required to establish and implement a Demand Side Engagement Strategy.

'We seek comments on whether the proposed content of the facilitation process document provides useful information and can be provided by DNSPs at reasonable cost'

'We seek comments on whether explicit protocols for the Demand Side Engagement Facilitation Process Document would be beneficial.'

ATA support these recommendations, but share concerns regarding the lack for protocol around the requirements of DNSPs to engage and inform non-network proponents.

For example, while the suggested material of the process document conveys useful information to non-network proponents, it is not sufficiently prescriptive, given the recommendation that "DNSPs should be given the flexibility to comply with the provisions and to maintain the document, in a way which reflects their own circumstances and interactions with non-network proponents".

In the event that in the first years of the framework DNSPs fail to adequately engage with providers of non-network solutions, the recommended three-yearly periodic review of the facilitation process document is unlikely to rectify this in a timely manner. On this basis, we suggest the following amendment to this recommendation:

An additional assessment of the effectiveness of the DSES, including a review of the facilitation process document, will be completed during the second year after the implementation of the framework.

2.3 Each DNSP would be required to publish a Distribution Annual Planning Report by 31 December, which must be certified by the Chief Executive Officer and a Director or Company Secretary, and conduct a public forum.

ATA support this recommendation in its entirety. The public forum in particular is key to engaging proponents of non-network alternatives; as DNSP planning reports are lengthy and technical documents, public forums can assist to better inform proponents of non-network alternatives.

We were concerned by DNSP's comments at the August 5 Draft Report Forum, expressing preference for the annual public forums to only be held 'by request' – i.e. that one would not be held in a given year if there was not sufficient interest from the public.

ATA are strongly of the view that the public forum is an important step towards breaking down the existing information barriers that impact potential engagement of proponents of non-network alternatives, and holding them only 'by request' will participation of non network proponents.

3. Further Contact

Please contact us should you have any questions regarding the content of this submission. I am available directly on (03) 9631 5418 or via email at: craig@ata.org.au.

Yours sincerely,

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