Thank you for the opportunity to provide a submission to the Access, pricing and incentive arrangements for DER.

I think the reforms proposed are important and, as a solar exporter, am prepared to accept the reality.

It is good that the draft report recognises that there are not sufficient existing incentives available for power exporters to shape the profile of power exports to the benefit of the grid/wider community.

I have a shed with three phase power and a 10kw solar power export capacity, and very little power consumption. I’m paid 20 cents per kWh no matter when I export the power - even when wholesale power prices are negative. I looked into installing a battery but, aside from the expense, there are currently no incentives for me to do so. Even the current battery subsidy only applies to houses - not commercial premises, so I would have to pay full price for a battery. The economics might change, though, if feed-in tariffs were paid according to time of use. At times of peak demand, the battery could be dedicated to export.

Consumer behaviour will respond to incentives. Off peak for hot water services could be shifted to daytime.

But in general, retailers benefit from volatility in prices by applying a risk premium to retail electricity prices. So, market reform won’t come naturally from them. It will require exactly the sort of rule changes proposed by AEMC.

In the meantime, I can accept that SAPN will need to switch off solar exports at times of excess energy supply.