

Submission Type: Rule Change

Reference: Access, pricing and incentive arrangements for distributed energy resources

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Comments: Submission to AEMC on solar Renewables and other small scale renewables .

I have only have two points to make about the proposal to limit the feed into the grid from renewable in particular by household with and without rooftop solar.

Point 1 retail providers of power should not be able to link solar feed-in payments (credits) with the provision of power from the grid.

Retailers currently do this and this results in the distortion in the market and the proliferation of plans that have complex cross-subsidization at the consumer level between power imported from the grid and power exported.

The FIT payment varies from Zero per kw to over 22c kw. Within the same retail plan, the cost of imported power to the retailer customers is used to subsidize the FIT payments.

I propose that the provision of retail level grid power to the consumer not be entangled in plans that also provide solar FIT

A retail grid provider business that provides both grid power and buys excess rooftop solar generation. ie paying credit for rooftop power or another source of small scale renewable no longer be legally allowed to be the same entity that provided both services to the consumer.

This will make it easier for the consumer to manage solar exports because it is not entangled with the various and confusion offers on rates entangled with imported grid power.

Point 2

I do not support quotas for the export of Solar power.

Quotas will stifle innovation in solar panel efficiency and design in particular the development of panels that can generate power in low light conditions.

In addition any ceiling limit eg the 10 kW per 24 hours will impact at the domestic level, other forms of renewable generation such as small wind turbines, moonlight solar panels, natural gas or biofuel generators, geothermal generators and domestic storage batteries that might provide power into the grid at night and during exceptional need times.

A crude limit ceiling limit or any other kind of limit eg Free daily FIT limit or no FIT to supply might well exceed any 24/7 hour limits limit on exported power eg such as the suggested AEMEC example at 10 kw maximum export.

There is no distinction made by the electrical retailer on how different renewable power to the grid at the household level is generated It just treats all generation the same as rooftop solar for the FIT

So when it is added to what is exported to the grid during peak day times - the rate does not distinguish how the power is generated or the time it is available or fed into the grid. For the retailer, all FIT is treated as if it was provided from rooftop.

The power that is produced or drawn upon (storage) from other sources and fed into the grid at night and during the day needs to be separated from Solar production. On the models or example given by AEMEC

Point 1 explains why it is necessary to separate into two legal entities THE RETAIL supply of the power from the grid and RETAIL purchase of rooftop / renewable power from households domestic producer/ generators including farms, other small business enterprises

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