The below submission has been lodged and confirmed on the AEMC Web site.

Submission Type: Rule Change

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

Organisation: Home

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Comments: We have a 5.5kw PV system plus a 9.8kwh battery, which we installed in part because of the number of blackouts in our area - there have been two in the last two weeks. But note that we are unloading the peak-hour system by so doing.
We also have a plug-in hybrid car with an 8.8kwh battery which we charge on off-peak power mopping up the excess power which is available for some 18-20 hours per day (but is poor quality inasmuch as the initial surge is often outside the car's charge parameters which causes it to switch itself off - most annoying.) I suggest your proposed penalty charge for PV owners will be counterproductive at a time when we should be moving to distributed systems of solar power, including batteries and electric cars which you should be encouraging not penalising. Why counterproductive?
First, the pricing system is now loaded against installing solar: for anything over 6 kwhs per day, we get only 7c/kwh - not a worthwhile return on investment especially taking account of the cost of a battery and in due course its replacement cost.
Secondly, we may well charge the car on solar thereby saving some 10c / kwh.
Of course, this means that we do not mop up excess grid power, nor for those without a battery, unload peak demand. Nor will it reduce exasperation about the unreliability of grid power (or dispatchability to use your jargon.) I note that electricity generators are moving to install large scale batteries and other storage near current power stations in order to use existing infrastructure, switchyards etc. It is time to encourage electricity companies to do so in order to absorb return flows from solar panels, not penalise household etc suppliers escaping from an antiquated system.