

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: N/A

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Comments: I am making this submission in a personal capacity as an owner of a small rooftop solar installation with a battery.

The rules are well intended but they do not incentivise distributors or operators to invest themselves in battery technology to balance the grid or decarbonize - in fact no consideration of the effect on decarbonising the grid has been taken into account. The application of distribution terms and conditions does not consider whether these terms are equitable when applied to local households nor does it regulate the making of equitable small provider terms.

There is no explicit rule change to reward or exclude battery operators even if they currently contribute to grid stability through programs like Reposit.

Rather than removing the prohibition on negative export charges a limited exception should be made and heavily guided to deal with the problem at hand, as it is likely that without strong guidance the policy reasons for this prohibition having existed (to avoid networks' pricing out; competition) will be lost, and the decarbonisation of the network started by individual families reversed in favour of large and carbon producing plants.

Also, at the moment there are a number of disincentives to battery technology that are in AEMCs control including a requirement to upgrade the DB to full compliance (even where market operators can install new meters onto old DBs) as well as a limit of 2.5kW draw during a blackout (effectively only one circuit allowed, excluding AC). This inhibits not only battery take up but also resilience (air con operation during extreme heat and a blackout). AEMC must take into account the total package of disincentives to local generation, the policy intent to not only stabilise the grid but also meet our international climate change commitments including decarbonising a major emitter sector, and whether the public policy outcome of shifting costs onto those who are least able to offset them is equitable.

Policy changes that are better targeted at increasing storage so that the existing solar and wind generation can be fully utilised would be a more equitable, sustainable and economically rational use of AEMCs powers.

It is unclear why the proponents of this change, which are largely not solar producers nor experts in the market, are considered "sufficient" for the rules as proposed.