

Community Electricity

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Submission in Response to ERA Consultation

Retail licence exemptions for Solar Power Purchase Agreement Providers

Standing

Community Electricity is

- a. a licenced Electricity Retailer and a provider of Electricity Market Consultancy
- b. a member of the Independent Market Operator's Market
- c. a member of the Economic Regulation Authority's Technical

Further information www.communityelectricity.net.au

Submission

Questions

Do you have any comments to make on the three draft -The Public Utilities Office is keen to gauge a clearer quantified costs for business of any changes in regulation you have any comments on the possible costs involved the product disclosure statement, or the registration and requirements?

Community supports the ERA's recommendation that a broad development instead of requiring every participant to seek a best that this will enhance business efficiency and reduce the compliance.

We support the intent of the Product Disclosure Statement

We suggest that:

- i) In general, PV facilities should be permitted to export network conditional on compliance with the network requirements. The alternative is to make unnecessary specifically destroy environmentally friendly energy. [The same thing as requiring somebody (the primary Retailer) installation of the PV or pay for the energy, but that permitted to take ~~payment with penalty~~.]
- ii) The scope of the business model that is being exempt defined as scope

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- iii) The ERA should reserve the power to exclude a specific class or exemption on the grounds of inconsistency with the terms of the exemption.
- iv) The Product Disclosure Statements should emphasise currently stand
 - a) End users must comply with the network requirements a installation and operation of a PV facility;
 - b) end users require the consent of the primary Retailer before installing solar PV facility;
 - c) the solar PV facility might impact adversely on the use of primary electricity supply to its user because of its primary offtake obligation;
 - d) the output of solar PV systems is seasonal, being
 - e) unless negotiated to the contrary, the primary Retailer is not pay for any surplus energy spilled to the network

Do you have any additional comments on exemptions for SPPA?

We suggest that:

- 1) The interaction of the solar PV facility with the primary system should be fully considered. For example, a PV system will usually have a variable (energy) output which may impact on the primary system's ability to supply to its users for up to 18 months of the year. This should be understood at the outset.
- 2) Precautions should be taken to ensure that the solar PV is not permitted to creep into the traditional electricity market and that suitable regulation.

Contact

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