



**ENERGY
CONSUMERS
AUSTRALIA**

A Suite 2, Level 20, 570 George Street
Sydney NSW 2000
PO Box A989
Sydney South NSW 1235
T 02 9220 5500
W energyconsumersaustralia.com.au
T @energyvoiceau
in /energyconsumersaustralia
I /energyconsumersaustralia

ABN 96 603 931 326

13 March 2024

Jacquie Shannon
(A/g) General Manager, Policy Branch
Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

RE: SA Power Networks request for a waiver to section 4.2 of the Ring-fencing guidelines

Dear Jacquie,

Energy Consumers Australia supports the Australian Energy Regulatory approving a waiver to section 4.2 of the Ring-fencing guideline for SA Power Networks (SAPN) to undertake its Market Active Solar trial from 1 July 2024 to 31 December 2025.

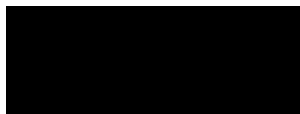
Energy Consumers Australia is the national voice for residential and small businesses energy consumers. These consumers, through their rooftop solar systems, collectively represent the largest power plant in the country. The low-cost energy produced from those systems benefits the owners of those systems through low power bills and all other consumers by reducing the market's need for more expensive sources of energy.

Effective operation of rooftop solar systems to respond to needs in the distribution network and conditions in the wholesale energy market should make the entire energy system more efficient and affordable for all consumers, while enabling more rooftop solar to join the energy system. We support this waiver because it enables SAPN, its retail partners, and participating customers to test various approaches to enabling more effective operation of solar systems for both distribution network and wholesale market needs and to identify the overall benefits for all consumers.

As part of the Dynamic Operating Envelopes Working Group, we have highlighted the need for transparent and simple communication to consumers on flexible exports. We expect the Market Active Solar trial to take such an approach: providing clear information on the potential impacts of participation, receiving explicit informed consent from participants, and ensuring participants know how to opt-out and how to access any dispute resolution resources they might need. We look forward to seeing the trial's insights as they explore customers' understanding of and attitudes towards the offers provided to them.

Again, we support SAPN's waiver application and anticipate their widespread sharing of the impacts and lessons learnt from this innovative trial.

Yours sincerely,



Brian Spak
Director, Energy System Transition