

30th January 2024

Mr Mark Feather  
General Manager  
Australian Energy Regulator  
GPO Box 3131  
Canberra ACT 2601

**Submission in response to Ergon Energy Ring-fencing waiver for MIST laboratory**

Dear Mr. Feather,

EcoJoule Energy is an Australian-owned designer and manufacturer of technology solutions that help transition the grid into a lower cost, environmentally sustainable and reliable system. We supply Community Energy Storage solutions to the electricity industry, in addition to power electronic based voltage regulation solutions.

We read with interest Ergon Energy's above mentioned ring-fencing waiver application and welcome the opportunity to provide a response. Our comments are in no particular order.

1. In general, we support the waiver to allow Ergon Energy to offer contestable electricity services to the market, based on the capabilities of the MIST Facility.
2. In general, we support the waiver from the functional separation obligations in regard to branding of services offered using the MIST Facility.
3. We agree that the MIST Facility is well positioned to contribute to the energy transition to renewable and decentralised energy sources.
4. We accept at face value that there are a limited number of comparable testing facilities to the MIST laboratory in Australia.
5. We agree that there would likely be a number of external parties who would be interested to use the facility. As a case in point EcoJoule Energy would be potentially interested to use the facility for testing of our technologies and products. As an Australian owned SME involved in the energy transition this is exactly the sort of facility we could and should gain access to.
6. The value of the facility to the industry would be substantially increased if open access was allowed.
7. It is not clear to us how it will be ensured that related entities such as Energex, Yurika and Ergon Energy Retail will not receive preferential access and testing rates compared to other interested users of the facility. We encourage an open mechanism to be put in place to ensure this.
8. Given this facility has been funded by the (mainly Queensland) taxpayer we urge that a mechanism be put in place to allow external parties to access this facility at (running) cost with no profit margin taken by Ergon Energy.



We trust this submission provides perspective and value to the AER. We are available to discuss the content of this submission if required.

Your faithfully,



Dr. Mike Wishart, CPEng, RPEQ

CEO

E: [Redacted]

M: [Redacted]