

14 March 2024

Australian Energy Regulator  
[AERringfencing@aer.gov.au](mailto:AERringfencing@aer.gov.au)

**Letter of support for the SA Power Networks ring-fencing waiver application**

RACE for 2030 CRC (RACE) writes to provide support for a waiver to section 4.2 of the Ring-fencing guideline for SA Power Networks to undertake its Market Active Solar trial from 1 July 2024 to 31 December 2025.

We recognise the challenges distribution network service providers (DNSPs) face in integrating very high levels of rooftop PV within the physical limits of their network. One of these challenges is managing the occasional excess of generated solar energy at times of minimum system load in high-solar locations, which has occurred first in South Australia but will emerge in other locations in the coming years.

It is now widely recognised that DNSPs will need to move from increasingly restrictive static export limits to dynamic operating envelopes (DOEs) to manage these network limits while enabling customers to get the most out of their investment in customer energy resources (CER).

While there has been significant progress in establishing DOE offers by distribution network businesses across Australia, it is essential that we ensure these offers work in conjunction with other emerging market-price responsive solar management schemes, such as those offered by energy retailers.

In light of this, RACE strongly supports the proposed project as it seeks to provide practical demonstrations of how a retailer-led solar management offer can work in conjunction with a DNSP-provided DOE to achieve an outcome that benefits the customer, the market and the electricity network. If successful, the approaches demonstrated in this project could be adopted across the NEM, giving customers access to a range of retail offers that help them achieve the most value from their own CER while keeping within the safe limits of the network.

If you have any questions or would like to discuss specific topics further, please do not hesitate to contact me at [REDACTED] or on [REDACTED].

Yours sincerely

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