

To whom it may concern

I apologise for the lateness of this submission and hope that it is still considered.

Amber Electric is committed to decarbonising Australia's grid, and many of the challenges we face in the shift to renewables are shared by SAPN.

Amber and SAPN have worked closely together over the last few years. Amber's battery optimisation platform *SmartShift*, was developed and released in SA first before being released to the NEM at large. It is now one of the most popular battery optimisation platforms in the country with 6MW+ of load under control.

We continue work and regularly consult with SAPN across various projects and initiatives including the SAPN Energy Masters project, our own ARENA funded EV automation trial, as well as recommending and implementing SAPN's innovative tariffs to our customers, where we have the tech in place for customers and the network to benefit.

Amber is fully supportive of the following points from SAPN's 2025-2030 AER regulatory proposal. Below is a brief explainer of how and why each are complementary to our mission and will benefit our customers:

1. Flexible imports

- These 'guard rails' ensure SAPN can effectively serve our customers with increasingly electrified homes, ensuring effective electricity supply as well as minimising costs associated with upgrading a site's electricity supply.
- The associated rewards from SAPN for participation in such a scheme will be passed to our customers, rewarding them for their flexibility and driving uptake of the technologies that will make meaningful impact on grid flexibility, modernisation and climate change.

2. A network services marketplace

- Any system where VPP operators, DER aggregators & battery operators can bid-in to support the network during constrained periods, and be paid for doing so, is complementary to our existing SmartShift DER optimisation platform, as it would be to a community battery. By passing this value on in full to our customers, we can improve battery ROI, lower costs for customers and improve network flexibility.
- Though the economic case for small scale community batteries is not strong, Amber is looking to change this and trial our first community battery pilot in the coming year. A scheme such as a network service marketplace improves the economic case for a community battery and as such, Amber is fully supportive of this. We welcome the opportunity to consult on design and implementation of any trial.

3. Greater visibility on network capacity, in the form of 'live' hosting capacity maps and trialling automated connections assessment tools

- This addresses a key concern from the point of view of public EV charging & community batteries, either LV or HV. Searching for an appropriate area on the network to connect is time consuming, difficult and expensive. Any form of greater visibility on network capacity, as well as reduced Network connection costs, lowers the CapEx required for a community battery, provides greater certainty on what upfront costs may be and improves the business case.
4. Two-way network tariffs
- Amber has been highly successful in offering SAPNs and other DNSP's two way tariffs. We have the technology to automate customers' solar and batteries to access the bonus reward for exports during peak times as well as curtail exports when the network doesn't want it. Further, our model is transparent with both penalties and rewards, driving further consumer behaviour change. We have several SA customers (including myself) on such two way tariffs and are supportive of them continuing.
 - The Two-way tariffs proposed for businesses are of interest to Amber also as they improve the economic case for BTM community batteries connected to the LV network.

Please feel free to reach out to me for any further information that will assist the AER in making a decision on the SAPN proposal.

Regards,
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