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The Australian Energy Regulator

Dear AER,

I am writing on behalf of the Smart Energy Council to express our support for the commendable initiatives undertaken by SA Power Networks (SAPN) that benefit our members and the broader energy industry. We believe these initiatives demonstrate SAPN's commitment to innovation and sustainability, aligning with our goals for a more efficient and resilient energy sector.

One of the key initiatives we wish to highlight is SAPN's suite of CER Integration business cases, particularly the proposed upgrades to the low-voltage network. These upgrades aim to minimize export curtailment for residential customers, ensuring a more stable and accessible market for CER participants. This not only benefits current CER customers but also encourages growth in solar installations and equipment manufacturing, contributing to a more sustainable energy future.

Additionally, SAPN's focus on demand flexibility, especially the expansion of flexibility programs to the load-side, is laudable. By providing opt-in, reward-based flexible import limits to CER customers, SAPN is facilitating the integration of diverse energy resources such as batteries, electric vehicles, and other flexible loads. This approach not only supports grid stability but also reduces network costs, benefiting all customers and market participants.

THE INDEPENDENT BODY FOR THE SMART ENERGY INDUSTRY IN AUSTRALIA

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The proposed Innovation Fund is another noteworthy initiative that aims to deliver new systems and

services for the CER industry. The development of a network capacity map and automated connections

assessment tools will provide greater transparency and certainty for industry players, reducing

timeframes and costs associated with network connections.

Furthermore, SAPN's efforts in CER compliance are essential for maintaining the integrity of the

network and ensuring the efficient operation of CER systems. By expanding automated compliance

systems and dedicating additional staff to compliance issues, SAPN is fostering closer collaboration

with the CER industry, ultimately leading to improved productivity and customer experience.

Finally, the introduction of bi-directional network tariffs demonstrates SAPN's commitment to fairness

and equity in cost recovery methods. By recovering costs only from exporting customers, SAPN

ensures that non-exporting customers are not unfairly burdened. This approach also incentivizes

battery adoption and supports the growth of battery sales and manufacturing, benefiting many

businesses represented by the Smart Energy Council.

In conclusion, we applaud SAPN for its innovative initiatives and commitment to sustainability. We

believe that these initiatives will not only benefit our members but also contribute to a more efficient,

resilient, and sustainable energy sector. We look forward to continuing our collaboration with SAPN and

supporting its efforts towards a cleaner energy future.

Sincerely,

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