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Energy Ministers Coordination
Department of Industry, Science, Energy and Resources
GPO Box 2013
CANBERRA ACT 2601

Email: demsaenwg@sa.gov.au

Dear Senior Officials

Re: Stand-alone power systems – consultation on revised National Electricity Rules and National Energy Retail Rules

We thank you for the opportunity to comment on the Stand-alone power systems – revised National Electricity Rules and National Energy Retail Rules (rule change package).

We support the development of a nationally consistent framework to enable distributors to move consumers to stand-alone power systems (SAPS). This supports a better consumer experience while maintaining consumer protections. It is also in the interest of each distributor's broad consumer base as it reduces network costs.

We have no immediate concerns with the proposed rule change package. If approved in its current form, the rule change package requires us to review a number of guidelines. We request that the timeframe for us to implement any amended guidelines align with timeframes sought by the Australian Energy Market Operator. In practical terms this would mean that the AER's review of guidelines would be completed by end of May 2022.

We are currently reviewing our ring-fencing framework in anticipation of the SAPS legislation and rules changing. Our review recognises potential circumstances where a third party is not able to provide SAPS generation services. To this end, we are exploring amendments to our ring-fencing guideline that provide additional flexibility for a distributor to provide this service. Our progression of this work in advance of the updated legislation and rules aims to provide all electricity consumers the benefits of SAPS deployment. We expect to publish our final guideline in September 2021.

Any late changes to the rule change package may adversely impact our current guideline review process. We would therefore request notification of any significant changes to the proposed rule change package before it is submitted to Energy Ministers for approval.

If you have any queries, or wish to discuss our submission please contact Robyn Pickering, Director New Markets and Innovation on 07 3835 4659 or robyn.pickering@acr.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to be the initials 'MF'.

Mark Feather
General Manager
Australian Energy Regulator