

12 May 2016

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235



Dear Mr Pierce

**ERC0204 - Consultation paper: National Electricity Amendment
(Registration of proponents of new types of generation) Rule 2016**

Energex Limited (Energex) welcomes the opportunity to comment on the consultation paper for the proposed rule change for the registration of proponents of new types of generation (ERC0204).

Energex supports the principle of technology neutrality, to ensure there is no bias or barriers towards one particular technology use over another. Energex is therefore supportive of the rule change which expands the definition of generating unit in the National Electricity Rules to include the production of electricity using all forms of technology.

However, Energex raises the following comments:

Treatment and definition of energy storage

Battery storage devices can service a large number of functions and can represent both a load and generation source for the distribution network. Energex suggests that consideration be given to include a specific definition for energy storage devices. Alternatively, Energex suggests the AEMC should ensure in changing the generating unit definition, that energy storage devices are not constrained solely to the definition of generation and this does not unintentionally suppress innovation for this area of emerging technology.

Use of generation technologies by networks

As well as enabling the connection of new and emerging technologies, Energex must be able to utilise efficient options to provide energy delivery and connection services to customers, including the use of alternative generation sources.

Should you have any queries regarding this submission, please do not hesitate to contact Ms Nerida Kemp, Senior Network Regulation Strategist on (07) 3664 4680.

Yours sincerely

A handwritten signature in dark ink, appearing to read "R Leaver".

Rachel Leaver
A/Group Manager Regulation and Pricing

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