The below submission has been lodged and confirmed on the AEMC Web site.

Submission Type: Rule Change

Reference: Access, pricing and incentive arrangements for distributed energy resources

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Comments: I note that the Australian Energy Markets Commission has produced a draft decision that will make households and small business with solar panels pay to inject their surplus production into the grid.

It suggests an annual charge of about A\$100 per solar-connected household.

The arrangement will only apply to small producers — almost all of whom are solar-enabled households. It won't apply to large producers who will continue to export to the shared grid without charge.

The proposed charge will negate any incentive for me to feed in to the electricity grid. It will increase the amount I pay for electricity and will remove any benefit for me as a net producer of electricity. It also inequitable targets financially vulnerable small producers while protecting larger producers.

The proposal effective punishes me for investing in solar panels and for being a responsible consumer by decreasing net reliance on other sources of energy and my contribution towards a carbon neutral future. The proposal is inequitable as it forces me to pay a charge for a very small component of the feed in at any given time. It also does not allow me to manage my feed in in any reasonable way. I cannot turns the sun off and I do not have the equity to invest in battery storage.

The Commission's argument that small consumers should pay to use the grid whether they are injecting electricity into it or withdrawing electricity from it, is flawed as I already pay a fee for accessing the grid, it is irrelevant that I am feeding into the grid as there is no additional cost to my electricity suppler, who already has to balance the grid, and my individual contribution is negligible. The Commission is in effect proposing I pay an extra charge for a service I am already paying for.

The remedy is for electric companies to invest in more storage capacity and improved networking to smooth the grid. This is already their responsibility and as such the cost should be borne by them and all consumers equally

Finally, the Commission should consider that consumers should be able to access the grid as a public benefit and not a commercial proposition for profit taking. It should also move to encourage the take up of wholesale and retail batteries through industry lead incentives and government programs.

Slugging the savvy consumer who was encouraged to, and moved early to adopt solar is not a solution that leads to confidence in future policy decisions, Emerging technologies are needed to meet the demands placed on us by the environment, limited resources and human behaviour