



SMART ENERGY
COUNCIL

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Dear Sir/Madam

Energy Security Board Post 2025 Market Design Options

Thank you for the opportunity to comment on the Energy Security Board's report on Post 2025 Market Design Options.

The Smart Energy Council is a peak national body for the solar, energy storage, smart energy management and renewable hydrogen industries.

The Smart Energy Council supports the submission provided by our member organisation IEEFA.

Following are some key points made by IEEFA in relation to the integration of Distributed Energy Resources and Demand Side Participation:

- A comprehensive review of the National Energy Consumer Framework is required building on the risk assessment tool developed by AEMC
- 'Network services' should be investigated through the Australian Energy Market Commission's annual Electricity network economic regulatory framework review
- We oppose any extension of the rooftop solar cutoff regulation and practice beyond South Australia and seek a sunset date of the operation of EnergyConnect for the existing AEMO process of cutting off solar
- IEEFA supports the proposed trader-services model whereby there would be one registration category and a 'modular' approach to obligations based on the services to be traded from each connection point (rather than the assets) and the ESB's consideration of an additional flexible trader model
- There is no objection to non-scheduled resources (e.g. generation/demand/DER) providing voluntary self-forecasts of future behaviour or intentions under the proposed 'information only' voluntary Scheduled Lite. However, significant further work to develop this proposal is required e.g. evidence must be provided as to how the efficiency of operational decisions will be improved by Scheduled Lite and clarity is needed regarding under what circumstances Scheduled Lite would become mandatory. The Dispatchability model of Scheduled Lite is opposed on the

grounds that it would impose significant costs on DER owners without a case as to the benefits to consumers.

- Proceeding with the Maturity Plan is opposed. Instead, IEEFA recommends the ESB prioritise the following urgent reforms:
 - Fast-tracking of rule changes on the governance of DER technical standards by AEMC
 - Greater resourcing and fast-tracking of DEIP work on Dynamic Operating Envelopes, including the AER taking responsibility for leading this work given the implications for DNSP connection agreements and the potential for improved consumer outcomes, including greater DER availability to participate in network support services
 - Putting modular definitions of market participants in place (as below)
 - Planning for a zero-inertia system. This is now urgent (see IEEFA's recent report on this topic).

Should you or your colleagues wish to discuss this further, please contact me on 0417 141 812 or wayne@smartenergy.org.au

Yours sincerely

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