

[REDACTED]

From: S W [REDACTED]
Sent: Thursday, 27 July 2017 4:11 PM
To: Retail Electricity Inquiry
Subject: Submission

Hi

I am making a submission as a small retail consumer who uses electricity for domestic purposes in a private household. I have no financial interests in any NEM participant. I am living in the [REDACTED] (who are my area's DNSP) franchise region in NSW.

Here are some views I have from having extensively followed energy policy in recent years:

It is supported by me that DNSP's be able to assign cost reflective tariffs to any new connection, whether its an existing site or a new structure, or whether its a residence or a site used for any other purpose, including changing metering to interval or smart metering in their own discretion where they hold the role of MC/MP.

It is a concern that retailers have wholly owned subsidiaries that are metering co-ordinators (MC) and metering providers (MP), despite the claim that they are ring-fenced I do not have confidence that the retailers are properly facilitating a market transition to increased availability of time-of-use (TOU) tariffs and that these retailer-owned MP/MC may set terms of business that act as barriers to competition should consumers wish to change their retailer.

It is a concern that networks continue to be allowed to claim augmentation as a basis for increases in network tariffs and/or daily supply charges, and its my view that they no longer be able to do this unless they have actively pursued and exhausted a variety of demand-side or demand response measures.

It is my view that networks outside Victoria have brought about loss of reserve (LOR) events in the National Electricity Market (NEM) by failing to appropriately promote and make more accessible time-of-use tariff and metering changes to retailers so that retailers may engage customers motivated to gain increased control of their energy consumption and reduce peak demand.

It is my view that small retail customers ought be able to appoint directly the MC and MP at their site so that they can gain expedited access to advanced metering that would enable us to achieve greater control over energy consumption, real time monitoring, and achieve savings through participating in time-of-use and other demand side measures.

DNSP in NSW outside the Ausgrid area have been reluctant to make easily accessible to consumers who wish to be assigned TOU tariffs appropriate interval metering, and DNSP inertia on metering and demand response schemes has contributed significantly to summer LOR events in the NEM.

DNSP must subsidise increased rollouts of various load controls from ripple control, sealed time clock and demand response enabling devices (DRED) to various consumer loads such as underfloor heating, hot water heating, air conditioning and other appropriate high loads to be considered.

Load controls for hot water that provide energisation to the hot water service for 10-16 hours per day may be beneficial for peak load reduction in small households and with advanced metering and a proper rule change the device can be fitted close to the hot water system in sites where there is a considerable distance between the system and site's switchboard, eg strata sites, so that its not needed to provide 2 accumulation meters on the switchboard for that dwelling.

Vertical integration in the NEM has the effect of reducing competition not only among retailers, but also among industry participants.

No NEM participant that is a retailer should be able to own generation facilities, as this creates conflict and market manipulation.

No NEM participant that is a retailer should be able to own an MC or MP while the retailer has the only authority to appoint an MC or MP.

No retailer should be able to disconnect any small retail customer who is using electricity in a private household unless the value of overdue debt exceeds a threshold of \$2,000.

Any consumer who requests advanced or interval metering at their site should have the request facilitated expeditiously by their retailer, the DNSP and if the DNSP is unwilling to facilitate the transition expeditiously and at no cost that could be passed through to the consumer, then the retailer is to expeditiously appoint an MC that has the abilities to provide advanced metering expeditiously.

When advanced metering is provided to a domestic premises, an in-home display is to be provided at the whole expense of the responsible person (RP), MC/MP or DNSP by resolution between the parties.

Shauna-Marie Wilson