



2021 -25 Draft Electricity Distribution Network Regulatory Proposal

Summary of feedback from consumer advocates



June 2019



Summary of responses received



Organisation	Contact	Response
Victorian Chamber of Commerce and Industry	Hugh Horsfall Manager, Economics and Industry Policy	Feedback via phone call (7/5)
St Vincent de Paul Society (SVdP)	Gavin Dufty, Policy & Research Manager	Feedback in person (6/5)
Maroondah City Council & Eastern Alliance for Greenhouse Action (EAGA)*	Scott McKenry, Executive Officer	Feedback via email (9/5)
Renew (formerly ATA)	Dean Lomard, Senior Energy Analyst	Feedback via email (10/5)
Victorian Farmers Federation (VFF)	Allan Bullen, President VFF Chicken Meat Group	Feedback via phone call

*The views represented here do not necessarily represent the views of all EAGA members individually

Feedback by themes



Theme	Comments	Organisation
Reliability	<ul style="list-style-type: none"> Members are reasonably happy with reliability levels 	Victorian Chamber of Commerce and Industry
	<ul style="list-style-type: none"> Uncomfortable with option of price-reliability trade-offs. Reliability and security of supply is crucial for a system already under pressure. Also need to consider the further pressure from electric vehicles. Further evidence of planning for this is needed. 	VFF
Prices	<ul style="list-style-type: none"> Small proposed increases/decreases being shared with the Chamber by the DBs are 'missing the point' that network costs are already experienced as too high. The Victorian Chamber wants to see more serious efforts to bring down network costs 	Victorian Chamber of Commerce and Industry
Engagement	<ul style="list-style-type: none"> The Chamber has been approached by all of the Vic DBs seeking essentially the same input through multiple channels and forums. It would be good if the process for seeking customer input could be streamlined. 	Victorian Chamber of Commerce and Industry
	<ul style="list-style-type: none"> This [EDPR document] would be far easier for me (and other stakeholders) to navigate and give feedback on if it had proper PDF integrated bookmarks for all the chapters and sections 	Renew
	<ul style="list-style-type: none"> Overtime, Customer Forum should be irrelevant, if AusNet Services is able build a better local presence, it will already have heard the customer stories that are being highlighted by the Customer Forum One way to achieve this is by using AusNet Services' workforce in local communities to identify live issues You don't want the Customer Forum to become another 'institution', a stakeholder to manage, which filters information about customers 	SvDP

Feedback by themes



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Solar	<ul style="list-style-type: none"> • \$1 per customer per year is very cheap. But the proposal gives no concrete info on the effect of this spend. How many MWh of solar curtailment do you expect with and without this spend? And how does it compare to the cost of doing nothing; or doing everything (i.e. building up the network to take whatever gets thrown at it)? Some data or discussion on how solar exports pass benefit on to non-solar customers would also help here, contextualising costs. • How many customers will be hit with export limits or refused a solar connection? Since it seems that you're talking about dynamic export limits, how will this work? Does this mean a new gadget will need to be installed in solar homes? • We are wary of an 'us vs. them' attitude (which I know some stakeholders have) toward solar and non-solar customers because it's a moveable feast, especially with Solar Homes – plenty of non-solar homes will be solar homes next year. But at the same time, we agree it's critical to manage any impact households that are unable to access DER • Your note that charging solar customers more than non-solar is prevented by current rules is not quite true. Some costs can be recouped through connection fees for new connections, and this is a possible avenue for cost-sharing. Still, your own customer feedback suggests that non-customers are open to sharing the costs; and the necessary work will benefit all customers by making more local generation available. A nuanced approach to sharing some of the cost across the whole customer base and recouping some through connection fees seems a good place to aim for – especially if more cost-reflective tariffs are designed to recover an appropriate amount of revenue from solar customers 	Renew

Feedback by themes



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Solar	<ul style="list-style-type: none"> There is no objection to the additional costs for ensuring solar homes/businesses are not export limited. Generally, energy users are of the opinion they've been paying hundreds of extra dollars every year for the networks to be gold-plated, so \$1 extra is immaterial and should be shared by all energy users. BTW - councils do not support rule change proposals that would see solar households charged for exporting to the grid 	EAGA
	<ul style="list-style-type: none"> Reposition 'supporting solar' as 'supporting transition' Can support \$1/p.a. per customer recovered from all customers on the basis that it gives a right to connection but doesn't guarantee injection of solar into the grid, and sets up the network for transition to the future, which benefits all customers Moving forward, to recover future costs, we need to move to a user pays approach. For example, for unconstrained injection, recover costs through an upgrade/connection charge or a reduction in the feed-in-tariff paid \$1/p.a. is a cap as it sets a precedent for cross-subsidy that you want to avoid in future 	SVdP
Innovation	<ul style="list-style-type: none"> Fully support the additional \$7.5 million proposed, particularly for programs that involve/collaborate with local governments 	EAGA
	<ul style="list-style-type: none"> Generally supportive of an increase in innovation investment of \$7.5m Examples of types of areas for innovation: Nodal pricing trials (residential, commercial and industrial), Community scale batteries for network support; Distribution platform for electric vehicles energy management; Peer to peer trading; Trials to explore the full value of smart meters. 	SVdP

Feedback by themes



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Electric Vehicles	<p>Key things to focus on at this point:</p> <ul style="list-style-type: none"> • Consider how they will fit with the approaches you're taking for managing solar exports • Start thinking about possible tariffs for EV-type loads, and how they would work along with other tariffs. For example, we think the key thing for EV-type tariffs is to incentivise chargers that *by default* avoid peak times. A controlled load tariff that comes on at a very low rate in the middle of the day and overnight, but can be boosted at an underlying ToU rate at other times for when the customer can't wait, is a good approach. And people won't voluntarily use these unless the off-peak rate is attractive enough to outweigh their expected use of the premium rate. • Regarding your "customer research that demonstrated customers did not want to fund innovation related to the needs of a very small number of customers expected to adopt electric vehicles over the 2021-25 period", it seems like maybe they were asked the wrong question because as far as I understand, the challenge is how to stop EVs from detrimentally affecting all other customers. 	Renew
	<ul style="list-style-type: none"> • Need to plan for impact of EVs on reliability of supply 	VFF

Feedback by themes



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Customer Service Improvements	<ul style="list-style-type: none"> • Haven't really had a chance to look at this in detail but have been involved in discussions with the customer forum about it and am supportive of efforts to address it. • The proposals for using smart meter capabilities to deliver more targeted customer assistance and services are great, this sort of thing is what AMI has been lacking and it's good to see meter functionality being used for more direct customer benefit 	Renew
	<ul style="list-style-type: none"> • Councils would like to see annual network constraints maps to allow greater harmonisation with land use planning 	EAGA
	<ul style="list-style-type: none"> • Supportive of steps already taken to improve customer experience • Suggested AST has a role to play in educating customers, potential to act as the 'local Government of energy' • To support vulnerable or disadvantaged customers, we need to adopt an agency approach – how to empower customers to optimise agency (independently make their own choices) 	SVdP
	<ul style="list-style-type: none"> • Generally supportive of Customer Satisfaction Incentive Scheme • Suggested using GSLs for community projects, e.g. local vegetation management • Suggested 'Kits for Schools', as a great wave to drive changes in behaviour in households e.g. YVW 	SVdP



Overview of other key feedback

Also see our website:

https://www.ausnetservices.com.au/Misc-Pages/Links/About-Us/Charges-and-revenues/Electricity-distribution-network/EDPR-2021_25

