

EUAA SUBMISSION: RINGFENCING WAIVER FOR DNSPS TO BID VOLTAGE CONTROL RERT TO AEMO

This short submission supports the application for a ring fencing waiver giving DNSPs the options of bidding voltage management services as a form of RERT to AEMO. With the expected increased demand for RERT in the future, the addition of another source to the AEMO tender process should have benefits for consumers in lowering the costs of RERT they would otherwise pay.

The only issue we have relates to the DNSP's use of capital paid for by consumer under the network's regulated revenue cap to earn unregulated income. We are concerned that even if the revenue is below the 1% threshold for any particular network under the shared asset guideline, the total over all DNSPs could become material.

We understand from the discussion at the 9th November forum that the AER will closely monitor the revenue earned from these services. We would propose that, to the extent possible by commercial confidentiality, the revenue earned by networks from providing this service be published at regular intervals by the AER, if it is not possible to publish it as part of the regular AEMO RERT reports.

Thank you for the opportunity to make a submission. Do not hesitate to be in contact should you have any questions.

Regards,



Andrew Richards
Chief Executive Officer