**Open Energy Networks**

**Consultation on how best to transition to a two way grid that allows better integration of Distributed Energy Resources for the benefit of all customers**

**Comments**

***Introduction***

These comments are intended to draw the attention of Energy Networks Australia and the Australian Energy Market Operator to the vision encapsulated in the policy ideas of The Plan to Repower Australia [www.repoweraustralia.org.au/how](http://www.repoweraustralia.org.au/how) . They comments are not limited to the questions asked in the current consultation process, but can provide an over-arching set of policies for framing solutions to these questions.

The Plan was researched by the Institute of Sustainable Futures, University of Technology, Sydney, commissioned and published by a consortium of social justice and environmental groups and written by energy policy experts Miriam Lyons, Nicky Ison and John Atkinson.

Its express aim is to guide governments and citizens in making the transition to 100% renewable energy electricity by 2030, with a few general remarks about how such a transition would generate such an abundance of renewable energy it would enable us to also transition the transport sector of our economy to 100% renewable by 2050.

It is based on a number of realities:

\* Coal is finished. Renewable energy (wind and solar) are cheaper. This is one of the few sources for hope in a dark time. Coal is not only cooking the planet, destroying landscapes, poisoning water and extinguishing species, it is damaging public health, so good riddance to it.

\* People love renewable energy and it has a strange habit of being more successful faster than it is predicted to be.

\* Part of this love is the natural tendency of renewable energy to be decentralised, creating the current grid problems this consultation is intended to discuss. As Energy Networks Australia is no doubt well aware, 30 to 45% of Australia’s future energy generation will be local and customer owned. Some of that capacity may wish to connect to the national energy grid.

\* Transition is inevitable, but we’re running out of time with the planet to make it happen and we need to ensure that the transition doesn’t deepen social inequalities, but reduces them.

\* Access to affordable electricity is a basic human right, like health care and education. Every renter, apartment dweller, low income earner and remote community needs access to clean and green energy generation, storage and efficiency measures.

\* If this plan were implemented, it would reduce Australia’s greenhouse gas emissions by 40%, allowing us to meet our Paris climate commitments without “creative accounting” rather than the puny 26% promised by our current federal government.

\* It will save electricity consumers $20 billion a year. This article “Shift to renewables would save Australians $20 bn a year - report” <https://www.theguardian.com/environment/2018/may/03/shift-to-renewables-would-save-australians-20bn-a-year-report> puts it in nutshell.

***Requests/suggestions/proposals for energy networks from the Plan to Repower Australia***

\* Familiarise themselves with the Plan.

\* Facilitate the transition to 100% renewable electricity by 2030 with social equity in every way they can.

\* Facilitate the connection of renewable energy generators, from domestic, commercial and industrial rooftop solar, to community owned renewable energy to major wind and solar farms.

\* Actively consider ways of providing affordable clean energy to all consumers, especially renters, low income earners, remote communities and apartment dwellers (“solar gardens”) .

\* Actively accommodate network contribution by batteries and other storage systems, like pumped hydro.

\* Provide prospective new generators with precise, accurate and timely information on their planned connections.

\* Enable peer-to-peer trading by becoming energy trading platforms. See section 2.4 Create the ebay of local energy, pages 58 to 59 of the Plan.

\* Aim at community service, rather than corporate profits, to save their customers’ money.

\* Stop income-enhancing network“gold plating” and focus on building needed infrastructure.

\* Support embedded networks.

\* Allow sharing of solar electricity between adjoining sites without charging the full network costs of that electricity to the coal fired power station and back.

***Stop network companies from wasting their customers’ money.***

***Make new rules requiring network companies to save their customers’ money –***

***page 64 of The Plan.***

See [Biggest winners, and biggest losers, of network monopoly game](https://reneweconomy.com.au/biggest-winners-and-biggest-losers-of-network-monopoly-game-36731/)

\* Have a decoupling policy.

\* Institute cost reflective pricing.

\* Promote demand management over building more poles and wires and charging customers exorbitant fees for them.

\* Accept Australian Energy Regulator price rulings, instead of fighting for more to increase profitability.

***Pages 68 to 69 of The Plan***

\* Abandon fixed daily costs for electricity connections and “special (extra) charges” for solar owners.

\* Set national benchmark tariffs by community consultation and move from declining to inclining block tariffs – charging more for using more (page 67)

\* Stop charging network customers more for network borrowing costs than the networks pay in interest.

\* Make tariffs simple enough to be understandable by domestic consumers.

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Limit "peak rates" to peak times.

\* Establish a fair national feed-in tariff which reflects the benefit of avoided demand for transmission and electricity loss along the lines, as well as the environmental benefits of solar energy

***Section 3.6 Grid access : connecting communities to power***

***Make sure network companies play fair in connecting renewables to the grid - (pages 78 to 81)***

\* Give generators certainty and transparency about grid connections.

\* Give renewables priority connection with a time plan, technical data, including relevant network compatibility tests data and costs of the connection within eight weeks of a connection request.

\* Build the new grid near renewable energy hubs.

\* Make the connection process fair and transparent.

* Consistent national standards for grid connections
* Have the Australian Energy Regulator conduct compliance audits for 10% of grid connections
* Create a national template grid connection agreement
* Enable renewable energy generators to choose which suitably qualified people undertakes the physical connection process

\* Create grid connection opportunity maps.

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Establish an independent national, publicly funded, non-profit grid planning authority

Jan McNicol

Climate activist

7 August 2018 Janmcnicol1953@gmail.com

Phone 0476 061 827