



13 August 2021
REF: SA DEM RF01

ATTENTION: Rebecca Knights
Department for Energy and Mining
Energy and Technical Regulation Division
GPO Box 320
ADELAIDE SA 5001

SUBJECT: STAND-ALONE POWER SYSTEMS – SOUTH AUSTRALIAN IMPLEMENTATION

Dear Rebecca,

Thank you for the opportunity to comment on the implementation of the national SAPS framework in South Australia.

Boundary Power is a joint venture between Australian energy utility, Horizon Power, and integrated electrical solutions provider, Ampcontrol Limited, bringing together significant stand-alone power system expertise.

Boundary Power's team of SAPS specialists have a proven track record in the end-to-end deployment of utility-grade stand-alone power systems throughout Australia. In 2019 the team designed, deployed and managed Australia's first fully integrated, utility grade stand-alone power system (SAPS) solution across regional Western Australia. The 17 SAPS units were deployed onto edge-of-grid customer homes and commercial properties east of Esperance, making Horizon Power the first utility in Australia to permanently remove 64 kilometres of poles and wires.

Boundary Power has demonstrated that SAPS can meet the power demands of households and businesses, proving that poles and wires are not always the most affordable, safe or reliable way to deliver power. It is from this real world SAPS experience that we can see the benefits to end users, the communities and to network service providers of installing SAPS at edge-of-grid locations.

We encourage the South Australian Department for Energy and Mining to proceed with a state-wide application of the SAPS framework, from commencement (Option 2 in the July 2021 Consultation Paper) in order to achieve the following benefits:

1. From a customer perspective – demonstrating fairness and equality by implementing a state-wide adoption rather than selecting specific geographic areas, and demonstrating confidence in the suitability of the new SAPS framework for the State;
2. From a community perspective – stimulating SAPS industry growth via supply chain establishment and local job creation, and achieving economies of scale, and
3. From a network service provider perspective – enabling access to a larger pool of suitable sites to facilitate effective and efficient program planning, and maximising cost and delivery efficiency.

We look forward to further engaging with the change process in South Australia and assisting to provide utility grade SAPS solutions to locations across South Australia.

Regards,

Amy Guo
Boundary Power Business Manager

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