

January 5, 2024

Justin Ward
Department of Energy and Mining
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Dear Mr Ward

Thank you for the opportunity to comment on the consultation paper: Amendments of the *Electricity (General) Regulations 2012* to establish a new planning and forecasting function.

While I sit on the Consumer Advisory Board for SA Power Networks, I make these comments in a private capacity as someone interested in assisting and advocating for vulnerable domestic energy consumers.

I welcome these proposed amendment to the Electricity Regulations and support your intention to *“undertake planning and forecasting activities to assess the least cost pathway for the development of the South Australian power system”* for the reasons outlined in the consultation paper.

I would however like to raise the following queries:

- While assessing the *“least cost pathway for the development of the South Australian power system”* will the Technical Regulator also be assessing existing and likely responses of market participants to changes in electricity demand, supply and supporting infrastructure?

I suggest an example of where the market is not working for the benefit of consumers is that despite the highest average penetration of renewable generation in the NEM occurring in SA, we have the highest 30 min electricity prices in the NEM for 2023-24 YTD. (<https://www.aer.gov.au/industry/registers/charts/annual-volume-weighted-average-30-minute-prices-regions>)

- Will risks sitting with and perhaps generated by the monopoly owner/operators of the distribution and transmission systems also be assessed? The Consultation Paper does not appear to address how the Technical Regulator’s planning, forecasting and assessment processes will interact with regulated bodies in the SA electricity sector.
- Finally, while I support *“assess[ing] the least cost pathway for the development of the South Australian power system “*, I would like to suggest the Technical Regulator could look beyond the overall average least cost, to price impacts by consumer cohort. An example might be assessing whether vulnerable consumers will be left disadvantaged if they are unable to participate in the 2-way energy flow market.

Sincerely,



Michael Leane