

## Submission in Response to ERA Public Consultation

### APPLICATION TO AMEND LICENCE AREA FOR DISTRIBUTION SYSTEM (EDL1)

#### Standing

Community Electricity is:

- a. a licensed Electricity Retailer and a provider of Electricity Retail Services and Market Consultancy;
- b. a member of the Independent Market Operator's Market Advisory Committee;
- c. a member of the Economic Regulation Authority's Technical Rules Committee;

Further information is available at: [www.communityelectricity.net.au](http://www.communityelectricity.net.au)

#### Submission

Community supports Western Power's application to extend its distribution network area on the grounds that it is in the public interest for Western Power to make more efficient use of its existing assets and deliver to edge-of-grid customers low-cost electricity. We also support the initial application of a Non Reference Tariff and load curtailment scheme on the grounds that Western Power is applying its normal Project Finance criteria to the extension (although the details have been redacted) and the customer has consented to the curtailment.

Notwithstanding our support for the network extension, we request clarification of Western Power's statement at the last paragraph of point 2:

“Western Power does not generate or retail electricity, nor does it operate in non-SWIS areas of Western Australia. As such, Western Power maintains key organizational relationships with Synergy – who are responsible for generation and is a retailer of electricity....”

Specifically, we request confirmation that the principle of competitive neutrality has been applied in respect of the retailing of electricity to the customer concerned.

#### Contact

For further information or comment, please contact:

Dr Steve Gould

23 April 2014