

Community Electricity

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Relevant Level Method Review

Standing

Community Electricity is:

- a a licenced 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

Submission

Community supports the draft report on the grounds that it pragmatically recommends business-as-usual in the face of complexity and insufficient data. In particular, we consider that there is a hidden variable impacting the assessment via the contribution to LSG of the rooftop solar, the uptake of which is still at high levels. This contribution is largely un-metered except via its impact on the Notional Wholesale Meter.

Given the complexity and data constraints, we would prefer simplification of the allocation of capacity credits to new facilities in order to reduce the cost of the expert review; in particular, the “experts” providing the estimate are subject to even more onerous constraints.

We also note that emphasis placed on LSG and consider that there may be merit in integrating elements of this approach with the dynamic capacity refund mechanism that is being contemplated. Given the hidden impact of rooftop solar, which renders the Peak Demand a quasi-LSG, it might also be worth integrating the approach with the IRCR Peak Intervals and the DSM Relevant Demand.

Contact

For further information or comment, please contact:

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