

# Community Electricity

*It's not just business; it's personal* 😊

## Submission in Response to ERA Public Consultation

### Proposed Amendments to the Technical Rules Submitted by Western Power

#### 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;

Community Electricity is a pure retailer and its business is not directly concerned with the matters considered, and specifically is not involved with any aspect of equipment or technical design to which the proposals relate.

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

#### Submission

We welcome the stated Western Power emphasis on removing barriers to entry, meeting users' needs and adapting to practical realities. We also support the stated Western Power use of temporary exemptions to expedite achievement of these outcomes.

#### Issue 1 – DC Injection Limit

We support Western Power's prima facie flexibility and adapting to practical reality, and thereby support the proposals. However, we have no direct practical experience of these matters and, given Western power's heritage of "conservatism", we look to others with direct experience to comment on whether the proposals could reasonably go further. In particular, insofar as there is difficulty in measuring the quantity at issue, one has to wonder how significant can be its impact.

#### Issue 2 – AS 4777 Date Amendment

We support the proposal as being reasonable.

#### Issue 3 – Clarification of Definitions

We support the proposed definitions. That said, in respect of the definitions of Entry and Exit Points, we would welcome clarification of the meaning of the phrase "expected to be". We would also prefer tweaking of the wording in respect of the point of common coupling so as to attach the "reasonableness" obligation to the exercise of Western Power's sole discretion rather than to the technical matters at issue.

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## Issue 4 - 2011 Review of Technical Rules Outstanding Matters

Community electricity has no direct experience in these matters and consequently we look to the affected parties to comment on these responses and proposals.

### Contact

For further information or comment, please contact:

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