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Sent: Wednesday, April 30, 2025 4:29 PM

To: AER Inquiry <aer inquiry@aer.gov.au>

Subject: Submission to the AER - Draft Shared Asset Guidelines and Explanatory Statement - March 2025 Regulated Stand-Alone Power Systems Review.

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DraftSharedAssetGuidelinesandExplanatoryStatement- March2025RegulatedStand-Alone Power SystemsReview.

AER'sRegulatoryDebacle:A CatastrophicBetrayalofAustralian EnergyConsumers

The Australian Energy Regulator (AER) has once again proven itself utterly incapable of safeguarding the national interest or upholding its stated mission to ensure that “energy consumers are better off, now and in the future.”

Instead, the AER continues to prop up a fatally flawed, ideologically driven energy agenda that is plunging Australia into an economically and strategically perilous abyss.

AER's updated **SharedAssetGuidelines**, allegedly to accommodate the Stand-Alone Power Systems (SAPS) rule change, are not only a bureaucratic whitewash—they are a deliberate reinforcement of a disaster-in-motion.

AER'sDeceit andComplicityinEnergySystem Sabotage

Rather than functioning as an independent regulator, the AER has acted as an enabler of the **debunkedandnon-independent IntegratedSystem Plan (ISP)**—a plan that is as much a fantasy as it is a roadmap to national energy ruin.

The ISP, driven by blind adherence to intermittent renewables, has already eroded the reliability of the National Electricity Market. And the new SAPS guidelines do nothing to correct this failure—they only deepen it.

The AER's refusal to consider **proven, superior alternatives**—namely **HELE coal** and **nuclear power**—is not mere oversight. It is ideological sabotage.

The Case for HELE Coal and Nuclear Power

HELE coal technology is being embraced globally—not discarded—by industrial economies that value reliability, affordability, and energy sovereignty. These plants emit significantly less CO₂ than traditional coal and can provide around-the-clock dispatchable power, regardless of weather. Australia, sitting on vast, strategically critical coal reserves, is being told to abandon its sovereign advantage in favour of unreliable, imported solar panels and weather-dependent wind farms. This is not sound policy—it is economic suicide.

Nuclear power, meanwhile, remains the gold standard of **zero-emission baseload generation** worldwide. It is the only viable path to achieving reliable decarbonisation, yet the AER and its aligned bureaucracies continue to ignore it entirely. While France, the UK, the US, Canada, and even emerging economies re-invest in modern nuclear technologies, Australia is trapped in a 1980s ideological time warp. Why? What vested interests benefit from this wilful ignorance?

Response to AER's Draft Guidelines & Key Questions

1. Do stakeholders agree with the updates proposed to the Shared Asset Guidelines to accommodate the SAPS rule change?

Absolutely not. These updates continue a pattern of regulatory cover-ups. SAPS allow DNSPs to profit off the regulated asset base and AEMO payments—effectively billing consumers twice for a service that is often less reliable than traditional grid supply. Instead of demanding DNSPs invest in real infrastructure like HELE or nuclear-backed grid upgrades, the AER facilitates their escape into “distributed” systems that shift risks and costs onto the consumer.

2. Are there any additional updates, related to the SAPS rule changes, we have overlooked that should be incorporated?

Yes—the *entire energy direction* of this country needs to be overhauled. The SAPS regime is just another unaccountable cost-shifting exercise that enriches private players while degrading service quality. There is no mechanism to enforce performance, no consumer protections for reliability, and no transparency about the long-term costs of replacement and maintenance.

Meanwhile, the AER *refuses* to consider the inclusion of **nuclear or HELE coal** into the asset planning and reliability modelling frameworks. This is a glaring omission—one that betrays consumers and sabotages Australia's industrial future.

Time for a Moratorium and Royal Commission

Enough is enough. We call for an **immediate moratorium** on all ISP and SAPS-related infrastructure and reforms, and the launch of a **Royal Commission** into the **ideological bias, regulatory capture, and systemic failure** of the AER, AEMO, and AEMC. This Royal Commission must investigate the political, financial, and bureaucratic collusion that has allowed these entities to drive up costs, destroy grid reliability, and force Australia into a fragile dependency on weather and foreign-supplied technologies.

For the True Greater Good

The only path to energy security, affordability, and national sovereignty lies in a rational, technology-neutral energy policy—one that embraces **HELE coal and nuclear power** as foundational to Australia's future.

SAPS, ISP, and the AER's greenwashed guideline updates are not about serving consumers. They are about preserving the illusion of competence while the system collapses.

The Australian people deserve better.