

Dr Aaron Liu

Queensland University of Technology

Phone: [REDACTED]

Email: [REDACTED]

Submitted via email to [tariffguideline@aer.gov.au](mailto:tariffguideline@aer.gov.au)

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Australian Energy Regulator  
GPO Box 3131  
Canberra, ACT, 2601

Re: AER-Export tariff guidelines consultation paper

I thank AER for providing the opportunity to contribute to the development of export tariff guidelines.

There are mainly three feedbacks to the consultation paper:

1. Tariff is often designed to incentivise certain behaviour for the collective good of using the electricity network. However, when export tariff is embedded in retail contracts, do we need evaluate whether that would have an impact in encouraging DER and/or batteries to operate in a way to assist the network operation?  
Because if the price signal is not explicit to customers, impacts may not be significant.
2. I understand the guideline is intended to set up principles for network operators to design export tariff. The purpose of the export tariff is to support safe and reliable network operation for the collective good (such as enabling more low cost energy to all). However, I am not sure if an energy based long run marginal cost would be fit for the purpose, or do we need a reward-and-price mechanism?

May I propose some out of the box thoughts (wild ideas) for the guideline: is it possible for the guideline to mention:

- welcome alternative or innovative methods for distribution network operators to support solar export with tariff or non-tariff mechanisms
- or options for customers to have solar export with non-tariff mechanism are welcome.
- or combinations of export tariff and non-tariff mechanism are possible

For example, instead of export tariff, can we have other methods to reflect/manage network use and ring fence uncertainty to solar households? A practical example in another scenario is ripple controlled electricity supply to storage electric water heaters with a guaranteed

hour of supply. I understand water heaters are energy consumers and potentially energy storage devices (not exporting energy). However, the philosophy of customer-centric network still applies here: lower energy prices for all customers with safe and reliable network.

Can solar households can have a choice such as between export tariff and a guaranteed maximum number of solar export events? such as export interruption or export limiting for a number of hours for a year.

3. I understand two-sided energy market is coming to distribution network in Australia (we are quite advanced in this aspect in the world). Is export tariff a transitional tariff or how would it be aligned with Australian energy market vision and development in distribution level? This feedback seems to be not closely relevant to the current consultation. I suppose AER and market pricing mechanisms need work under the current legislative framework.

I thank AER for undertaking consultations and always trying to be customer centric. Should you have any questions regarding this submission, please feel free contact me ( [REDACTED], or [REDACTED] )

Yours sincerely,

Aaron Liu

PhD and registered electrical engineer | Research Fellow

School of Architecture and Built Environment, Faculty of Engineering

Queensland University of Technology, Brisbane, Australia

Please note:

This submission is the views of the person who made the submission, not the employer of the person or funding institutes for the person's work.