

8 March 2022



Warwick Anderson  
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Via email: [tariffguideline@aer.gov.au](mailto:tariffguideline@aer.gov.au)

Dear Warwick

**RE: Draft Export tariff guidelines**

AusNet appreciate the opportunity to comment on the AER's Draft Export Tariff Guidelines (the Guidelines).

Consistent with our previous submission in response to the consultation paper, we support the introduction of export tariff guidelines that are not overly prescriptive. We welcome the AER's principles-based approach and consider the draft guidelines offer Distribution Network Service Providers (DNSPs) the flexibility to introduce and design export tariffs appropriate for their individual network and customers.

We also support:

- The AER's acknowledgement that DNSPs operate under different environmental factors across jurisdictions which needs to be appropriately considered when designing and proposing the introduction of export tariffs.
- The scope of stakeholder engagement on export tariffs outlined provides appropriate direction and flexibility for DNSPs to conduct consultations suitable for their stakeholders.
- The recognition that DNSPs can apply learnings from other DNSP's research and tariff trials. These shared learnings from other DNSP tariff trials, along with extensive stakeholder engagement will allow DNSPs to make informed export tariff decisions.
- The principles outlined in relation to how export charges should be allocated. Export tariffs should only reflect the costs of providing export services and not reflect costs associated with providing consumption services, and we support the requirement to demonstrate no double counting of shared residual costs as it will provide confidence to stakeholders.
- That the customer impact analysis approach is not prescriptive and DNSPs are to apply the most appropriate approach to demonstrate the customer impact of export tariffs.
- That basic export levels may vary through time or across different geographic areas within a distribution network. This flexibility is essential as it allows DNSPs to set basic export levels to accommodate differences within their own customer base and network and over time.

If you have any questions regarding this submission, please contact Eliza Cochrane by email on

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Yours sincerely

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Charlotte Eddy  
General Manager, Regulatory Strategy and Policy  
**AusNet Services**