

Warwick Anderson
General Manager, Networks Finance and Reporting
Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

SAPN02020@aer.gov.au

15 May 2019

Dear Mr Anderson

**Submission to the Australian Energy Regulator (AER)
SA electricity distribution determination – SA Power Networks 2020 to 2025**

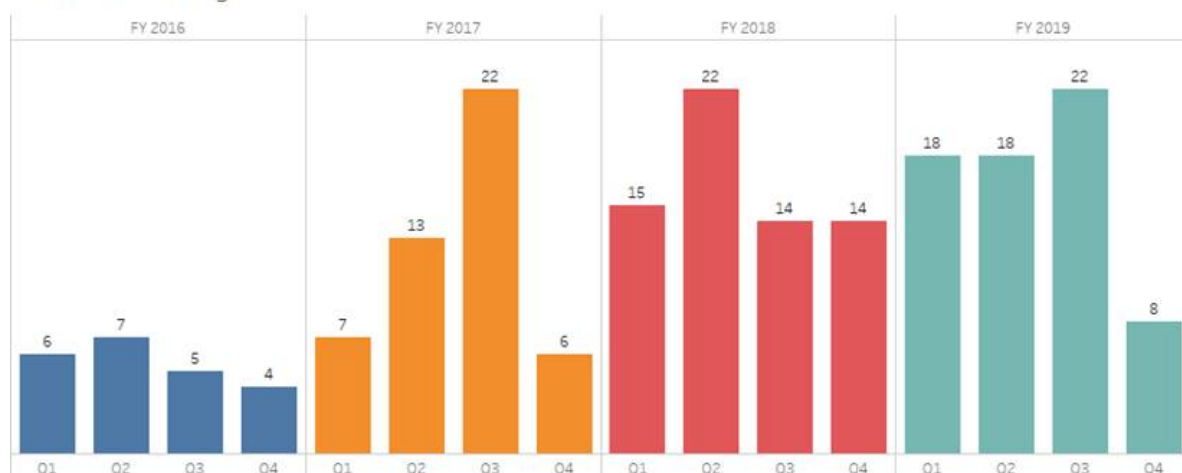
The Energy and Water Ombudsman (SA) Limited welcomes the opportunity to comment on the Australian Energy Regulator’s SA electricity distribution determination – SA Power Networks 2020 to 2025 from March 2019.

We are an independent energy and water ombudsman scheme in South Australia. We receive, investigate and facilitate the resolution of disputes between customers and their electricity, gas or water suppliers.

While it is not our role to comment on SA Power Network’s 2020-2025 Regulatory Proposal or your determination, we are in a position to share our experiences with electricity customer’s issues with voltage variations, PV and battery capacity and network demand.

The number of complaints we receive relating to PV constraints and variation in voltage has steadily increased over the past four years. Complaint numbers are seasonal with more complaints in the summer and early spring and appear to correspond to more and more customers having solar systems installed (refer to graph below, noting the current quarter is low as the data was not yet available for the full quarter).

Variation in Voltage cases



Customers with PV installations who are experiencing inverter high voltage and network congestion issues are finding that:

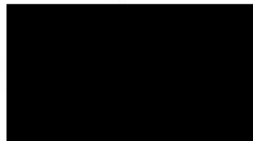
- voltage fluctuations cause their solar inverter to switch off
- having made a significant investment in a solar system, they often can't use the system or are not able to export electricity back to the grid
- they are not getting the solar benefits and return for investment they had expected
- they had not been alerted to any network congestion issues prior to installing solar systems and making the investment.

It should be noted that the deemed connection contracts exclude any recompense for customers unable to get their solar feed-in tariffs. Our concern is that if these issues are not addressed, customers remain disadvantaged.

While the energy market and systems are in transition as storage and new business models emerge, the long-term interests of consumers need to be considered.

Should you wish to discuss this submission, please email [REDACTED] or call on [REDACTED].

Yours sincerely



pp. Sandy Canale
Energy & Water Ombudsman SA