Hello Robyn

Thank you for your help with finding the relevant documents today.

I am calling this a submission on the preliminary decision document but my comments relate equally to the recently approved pricing structure for SAPN

I believe The AER’s recent pricing determination decision for SAPN in 2015/16 is in breach of the terms set out in the preliminary decision, namely, Section D.3, clauses  4 and 5 of Attachment 14

Section D.3 covers how SAPN should handle assigning and reassigning customers to particular tariff classes. Clause 5  talks about how a change in tariff may be considered if the load characteristics of a customer has changed making them unsuitable for the tariff they are on. I would argue that a solar customer with lower peak and overall energy requirements is far more suited to the tariff they are presently on. If not they have the right to opt in to Actual Demand tariff structures like all other customers. This clause also refers to clause 4. 4 b. states; retail customers who have micro–generation facilities are not treated less favourably than retail customers with similar load profiles without such facilities. It cites the National Electricity Rules; NER, cl 6.18.4(3) which says the same thing.

SAPN makes it clear in section 2 (d) of its Tariff Rates document that its justification for the tariff change is the meter change. Then it states that actual meter changes are exempt, while solar and storage applications are not. This is clearly an attempt to discriminate against micro-generation

It has also applied this decision “effective immediately” which makes existing solar contract with these customers very uncertain. Particularly those already installed and awaiting meters.

I have attached the relevant documents referred to here. I urge you to take this to the relevant Directors of the AER for urgent review as this current arrangement is set to cause unnecessary damage to the Solar industry

Kind regards,

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