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Submission: "Dear IPART

As of last year, Victoria has a much fairer FiT system than NSW. Your decision should reverse this situation by requiring...

- \* a compulsory minimum FiT rather than merely suggested rates
- \* an allowance in the FiT to reflect greater cost of supplying electricity from distant power stations. For simplicity this could apply to all customers in the Essential Energy distribution area
- \* three FiT rates as in Victoria (off-peak, peak and emergency) for users with interval meters. This would involve simple calculations by retailers based on data regularly uploaded from meters (either via meter readers or the Internet), and would have the beneficial side effect of encouraging replacement of ancient accumulation meters
- \* an allowance in the FiT amount for the avoided social costs of carbon emissions, using the same methodology as the ESC

The NSW FiT rates should also include an allowance for avoided human health costs attributable to air pollution - the quantum would probably have to be nominal given the difficulties in calculating an appropriate amount, but it would set a precedent that external costs of non-renewable energy sources are real."