

Review Panel IPART

Firstly I would like to totally endorse the submission from SEIA by Geoff Bragg, and would like to add the following:

The draft specifies that the Tariff (ca. \$0.10) and the Retailer contribution (\$0.075) should be voluntary rather than mandated. This is a total of ca. 17.5 cents.

The Terms of Reference (ToR) do not appear to require that the findings of IPART be voluntary. If the figure decided by IPART is deemed to be 'fair and reasonable' for the retailers as required then mandating the amounts should also be 'fair and reasonable' for the consumers.

As there has now been around 9 months for the retailers in NSW to decide if retailers would have a competitive edge by offering anything like this and have so far failed to do so, it is obvious that unless the Feed-in-Tariff and/or Retailer Contribution are mandated to total AT LEAST this level of support, then the industry in NSW has a very sad future. I ask that the amounts seen as 'fair and reasonable' are recommended to be mandated.

I would ask the IPART Committee in its final report to outline the limitations of the Terms of Reference in determining an outcome that would facilitate support for distributed energy for the residential and commercial sectors as is the wish of a large part of the population of NSW (voters) and which would assist in achieving the Government's 20% renewable goal by 2020.

As the ToR also ask that no funding is required of the NSW Government it seems 'fair and reasonable' that the subsidies for the coal mining and coal power generation industry are also not required of the NSW Government which would indeed create a level playing field and would also 'facilitate retailer competition' as is outlined in the ToR.

The partial or full removal of coal subsidies would also affect the base buy rate for power and this would change the modelling you have undertaken to determine the 'fair value' price for a Feed-in-Tariff. The final report should detail this situation so that there is complete openness regarding the assumptions and basis for the conclusions reached.

In assessing the 'benefit gained by customers and retailers' as required in the ToR, it seems that there is a case for the impact of a 1:1 Feed-in-Tariff on both the network and for customers. This is the idealised level for a FiT, seen by the customer as the most 'fair and reasonable' as it enables them to obtain a daytime credit against night time use and is also 'fair and reasonable' in that consumers are not obtaining a benefit at this rate at the expense of other consumers or the network providers.

Thank you,

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