



SolarCitizens

A community voice for solar

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By email: info@esb.org.au

To the Energy Security Board,

Submission to the Energy Security Board's NEG Draft Detailed Design Consultation Paper

Solar Citizens is an independent community organisation that aims to protect and grow solar in Australia. With over 100,000 supporters, we stand up for the over five million Australian solar voters and the millions more who want to go solar.

Solar Citizens is deeply concerned by the approach taken to rooftop solar in section 3.3.3 *Accounting for generation and load*. Particularly:

“Rooftop and other small-scale solar PV will be captured by adding the net exports from PV installations to the relevant market customer's load, and will also be automatically allocated to that market customer in the registry as zero emissions generation.”¹

Solar Citizens believes that rooftop and small-scale solar PV exports should not be allocated to the retailers. In a similar way to people who participate in GreenPower schemes, rooftop solar owners have undertaken voluntary action to reduce the emissions associated with their electricity use -- allocating credit for their clean energy exports to the registry means this is no longer the case. Including rooftop solar exports in the registry will mean less clean energy will need to be built under the NEG and, except in Victoria, retailers have no obligation to pay for the rooftop solar exports so they could claim this clean energy for free. If this approach is taken, it negates the current additionality of rooftop solar owners' actions.

Environmental benefits of rooftop solar is a key element in solar owners decisions to make the investment while also being a key satisfaction indicator. Analysis commissioned by Energy Consumers Australia shows that protecting the environment was a factor that contributed to the decisions to install solar for 72% of solar households.² Solar Citizens' 2017 survey of close

¹ Energy Security Board's NEG Draft Detailed Design Consultation Paper, page 23.

² “Residential PV: Customer experiences and future developments.” KPMG, p 38, available at: <http://energyconsumersaustralia.com.au/publication/consumer-participation-in-solar-and-battery-storage-markets/>.

to 4000 solar owners show 96% are satisfied with the environmental contribution of their solar electricity exports.³

Solar Citizens recommends that this provision be removed and solar exports remain separate, as is being proposed for GreenPower and is the structure under the existing renewable energy target. If rooftop solar exports are to be allocated to retailers in the registry then there must be provision to fairly compensate the solar owners for their contribution through a mandated fair price for solar.

Sincerely,

Shani Tager
Senior Campaigner

³ https://www.solarcitizens.org.au/2017_survey_report.