

24 September 2021

Warwick Anderson
General Manager, Network Pricing – ANS model
Australian Energy Regulator



Submitted via email to AERPricing@aer.gov.au

Dear Mr Anderson

Standardised Model for Ancillary Network Services Issues Paper

The Public Interest Advocacy Centre (PIAC) is a leading social justice law and policy centre. Established in 1982, we are an independent, non-profit organisation that works with people and communities who are marginalised and facing disadvantage. PIAC builds a fairer, stronger society by helping to change laws, policies and practices that cause injustice and inequality. The Energy and Water Consumers' Advocacy Program (EWCAP) represents the interests of low-income and other residential consumers of electricity, gas and water in NSW. The program develops policy and advocates in the interests of low-income and other residential consumers in the NSW energy and water markets.

PIAC welcomes the opportunity to respond to the Australian Energy Regulator's (AER) Standardised Model for Ancillary Network Services Issues Paper (the Issues Paper).

PIAC supports a standardised Ancillary Network Services (ANS) model. ANS pricing is currently provided by each of the distributors and can involve complex, inconsistent and confusing price modelling. The approach outlined in the Issues Paper will remove barriers for retailers and assist 'end user' paying customers to engage with the ANS component of distributor determinations. Standardised and simplified ANS modelling will also provide greater transparency and assurance that ANS prices are efficient, reasonable, and cost reflective.

Standardised ANS modelling would align with the approach taken to the Standard Control Services capital expenditure model, and the upcoming initiation of a standardised metering model, and a standardised annual pricing model.

PIAC welcomes further opportunity to discuss these or any other issues in more detail with other stakeholders and the AER.

Yours sincerely

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