

**RESPONSE #4632 SUBMITTED ON 05/13/2021 04:23:29 PM**

## Tranche two regulations issues paper consultation submission form

**Your details**

Submission type	Organisation
If Other, please describe	No answer given
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Stakeholder group	Generation or storage infrastructure provider
If Other, please describe	No answer given

**Questions****Chapter 4 – Energy Security Target**

Question 1: Should the Energy Security Target Monitor define the method to determine the derating factor or should the method be defined in the regulations? If not by the derating factor, how else should the regulations address the probabilistic nature of semi-scheduled generators in the context of the deterministic Energy Security Target?

No answer given

Question 2: Should the regulations prescribe any other matters for inclusion in the Energy Security Target Monitor's report? If so, what are they?

No answer given

**Chapter 5 – Electricity Infrastructure Investment Safeguard**

Question 3: To what extent are the requirements for carrying out competitive tenders of Long Term Energy Service agreements appropriate? Are there any other requirements that should be considered?

**The fifth proposed requirement is to encourage competition “amongst generators and retailers”. We assume this is intended to drive competition for the provision of LTESA offers. If that is the case, it is important to recognise that potential providers of LTESAs might not be Generators or Retailers, but could be aggregators or other independent providers that can offer generation, storage or demand response capacity into the market via other market registration categories, e.g. Small Generation Aggregator or Demand Response Service Provider. We encourage DPIE to not constrain eligibility for LTESA tenders to Generators and Retailers alone. Expanding the pool of eligible providers will make sure the process is technology neutral, and will drive competition so that any awarded contracts deliver the highest long-term financial value.**

Question 4: Do you agree with the matters the Consumer Trustee must take into account when preparing the Infrastructure Investment Objectives Report? Are there any other matters that should be taken into account?

*No answer given*

Question 5: In what circumstances should the Consumer Trustee prefer long duration storage over firming infrastructure to meet the reliability standard?

*No answer given*

## Chapter 6 – Classification of Renewable Energy Zone (REZ) network infrastructure

Question 6: Are there any other considerations that should be taken into account in classifying REZ network infrastructure in regulations, including the need for, and scope of, sub-classifications?

*No answer given*

Question 7: What types of network infrastructure could be subject to economic regulation under Part 5 of the EII Act?

*No answer given*

## Supporting information

If you have additional information you would like to provide to support your views, please provide it here

*No answer given*

If you have additional documents to provide to support your views, please upload them here

*No answer given*

## Confidentiality and submission publication preferences

Would you like all or part of your submission to be confidential?

**No**

Would you like your submission to be

**No**

anonymous and these personal details  
redacted?