



20 November 2025

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Dear Sarah

Consultation Paper: Electricity System and Market Rules for Distributed Energy Resources – Roles and Technical Requirements

Alinta Energy is pleased to provide comment on EPWA's Consultation Paper, which sets out the proposed Electricity System and Market Rules (**Rules**) for establishing the initial framework for integrating Distributed Energy Resources (**DER**) into the SWIS. We support Rules that will:

1. Define the key roles relating to the operation of DER;
2. Establish the minimum technical requirements for DER; and
3. Provide a framework to support Third Party Aggregator (**TPA**) services

and acknowledge that the Rules will need to reflect the linear contracting model in the SWIS where, unlike in other Australian jurisdictions, the end user does not have a direct relationship with the distribution network service provider.

However, in our view, the success of this framework will depend on enabling genuine choice and flexibility for both TPAs and participating customers. This includes the ability for TPAs to contract with a range of authorised Service Providers rather than a single mandated parent aggregator and the ability for households participating in Virtual Power Plants (**VPPs**) to opt in with their preferred energy retailer. These elements are central to developing a competitive and innovative market that supports EPWA's objectives and maximises the value of DER for customers.

Whilst we agree that codifying long-standing policy positions concerning DER will help address challenges arising from the rapid growth in rooftop solar, batteries and electric vehicles, ensuring that the framework preserves this choice – both in the TPA market and in VPP participation – will be critical to achieving the intended outcomes. Our comments therefore focus on aspects of the proposed amendments that would constrain these opportunities.

Proposed Amendment 5

We do not consider Proposed Amendment 5, which establishes Synergy as the parent aggregator for TPAs with non-contestable customer DER, to be in the long-term interests of TPAs or, by extension, their customers.

EPWA comments in the Consultation Paper that not only is it 'highly desirable that a TPA market be able to grow in size and sophistication in the SWIS' but that 'Synergy's role as parent aggregator must not preclude other aggregators from being able to provide non-contestable consumers with choice and provide necessary services.' We consider an arrangement whereby a TPA could elect to contract with either Synergy or with another Service Provider authorised to provide Non-Co-Optimised Essential System Services (**NCESS**) to AEMO would better support EPWA's position as expressed in the Consultation Paper. Codifying Synergy as the sole parent aggregator may stifle growth and innovation in the TPA market if there isn't a range of options available including, for example, parent aggregators offering contracts as an alternative to Synergy's standard form contract developed under proposed clause 2.34C.5(e).

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Proposed Amendments 6 – 8

Because TPAs could be seeking to provide aggregation services in direct competition with Synergy, Proposed Amendments 6 – 8 require Synergy to establish a framework for facilitating access for TPAs to provide NCESS or other supplementary capacity. As EPWA considers that 'a rigorous regulatory regime that included independent approval, monitoring, compliance and enforcement processes was determined to not best achieve the SEO at this time', it is imperative that the proposed TPA Framework is clear, robust and impartial to both Synergy and TPAs.

To achieve such a framework, sufficient time must be provided for its development – we consider the proposed 1 February 2026 commencement date to be highly unreasonable. Additionally, a compressed consultation timeframe over the summer holiday period is unlikely to allow for 'adequate opportunity for relevant stakeholders to present their views' on the framework as set out in clause 2.34C.1 of the Exposure Draft.

We would welcome the opportunity to discuss our comments further with EPWA.

Yours sincerely

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