Submission to the Electricity and other Legislation (Batteries and Premium Feed-in Tariff) Amendment Bill 2018.

Our Household has encountered some serious practical difficulties for our 2008 Solar Generator's continued existence, should the above Amendment Bill be passed in its current form.

Concern is in relation to Section 44A (1A) and, Specifically Section 360 (2) containing a so called EXEMPTION pertaining to 'Over-sized' Photo-voltaic Modules (Panels) and related 'like for like' servicing replacement.

In the current 2018 Amendment Bill's earlier iteration of mid 2017, the then Minister Hon. Mark Bailey proposed retrospectively prohibiting 'over sizing' of PV modules (Solar Panels) for those not already 'over sized' prior to 15th June 2017. (At least for those wishing to maintain eligibility for 'Premium' Solar Feed in tariffs.)

Our Household's 2008/10 Solar Panels by Minister Bailey's definition are 'over-sized'. Technically they have only been so been since 1st August 2015. Well after there original installation, but well before Minister Bailey's qualifying cut off of 15th June 2017. But as a direct result of 44A (1A) Section 360 (2), Should this new Bill Amendment be voted into law, I have recently learned that our Household will be in Breech of its original Energex 'Photo voltaic Network Connection Agreement' and consequently stands to loose 'Premium' Feed in entitlement.

Concerned, I made my first submission back in November 2017 to the original 2017 Amendment Bill (2017 Submission [Attached]). In reply (Submission 002 A Kerr [Attached]), I was given the initial impression that 'On the basis of Mr Kerr's explanation, under existing Solar Bonus Scheme rules, [I would] remain eligible for the Solar Bonus Scheme if [I] replaced [my] degraded panels with like-for-like parts.' However having been hardened by passed experience, I pressed the point to dig a little deeper and have discovered this is unlikely to be the case.

Relevant Historical Background:

Motivated by Bligh Government incentives, our Household back in 2008/9 had two Grid connected Photo voltaic (PV) Electricity Generator system's professionally installed by licensed electricians Ian Stromilo, on behalf of Solar Shop Australia (PV1) and Andrew McIntosh, on behalf of Ingenero Queensland (PV2). The Ingenero installation was notably unique in that it was won at the Brisbane City Council 'City Smart Green Heart' fair at Mount Gravatt Show grounds, a prize for guessing the amount of Greenhouse Gases it would save (5 Tonnes a year) entering the atmosphere. The \$6,500 win included installation and an article appeared in the local paper at the time which included a photograph of the happy recipients standing outside the house onto which the system had been installed. 30 Kanaka KS60 Panels (PV1) were now joined by 8 Suntech STP200's (PV2) suppling, with favorable sun, the now two identical 1.7Kw SMA Inverters wired electrically in parallel. Both legitimately directed surplus electricity into the Energex

Grid, for which we were routinely credited the proscribed 44 cent Kw/Hr Solar Bonus Feed in Tariff (FiT) by the Electricity Retailer Origin.

Nearly six years pass. July 2015. We received an unexpected letter from Energy distributor Energex stating that we were in 'breech' of Energex's 'Photo voltaic (PV) Network Agreement'. Energex gave us one month in which we had little choice but to hastily arrange a dramatic reduction in Solar generation capacity to avoid disqualification of any further FiT entitlement, the now so called, 'Premium' tariff. PV2 was now totally electrically disconnected and PV1 was made to suffer a downgrading of its Inverter from 1.7Kw to the smaller 1.1kw.

From 2008/10 it was no secret that our two 1.7Kw Generators were feeding there surplus Solar electricity into the grid. But Energex conveniently failed to act on this, instead waiting for some five years to draw our attention. Earlier than this, if they'd of even bothered to issue a breech notice at all, a simple reapplication of paperwork would of fixed things and constituted no forced truncation of our then Generated output. Both systems could of continued on as normal with original through July 2028 as should have been the case.

But by patiently waiting until after alterations to the original scheme had been made effective from 1st July 2012, Energex now had a loophole and were able to enforce a provision buried esoterically in some paper work of theirs of which we now became only dimly aware.

Any attempted 'paperwork' correction after June 30th 2012 to Energex's claim of breeched network agreement would not have been possible. As to do so under the amended 2012 scheme, any reapplication would have resulted in both our 2008/9 Generators then no longer qualifying for the original FiT for which they were legitimately installed.

At any rate, our household was to remain blissfully unaware of all this until July 2015 when Energex served us their 'Breech' notice. By then both Solar Shop Australia and Ingerero had gone bust leaving receivers who where not the least bit interested in delving into company paperwork, if it still existed at all.

Indignant protest and appeal was made to the relevant Ministerial Office of whom Hon. Mark Bailey was head at the time. On 20th August 2015 a delegated reply was received from the Energy and Water Commission stating they would not 'Intervene' (Full letter and reply as attachments).

This was despite our original 'Photo-voltaic (PV) Network Agreement' (the agreement Energex keeps referring to), covering it said 'PVs up to a maximum of 10 kV.A Single phase.' (but no greater than 5Kw for our household as set out under 'PV Generated Energy' clause page 1).

Although cloaked in technical jargon, difficult at first to fathom, the Energex signed 'Customer Copy' contains no specific reference to the specification Energex mandated we adopt from August 1st 2015. This very document is still in our households possession with its original covering letter and attachment (A connection 'Brochure'), as is all paperwork, invoicing and receipts we were given relating to the original 1.7Kw installation and its 30 KS60 Kanaka panels.

In other words we did not know nor could of reasonably foreseen that the decision to close off the scheme to new participants midway through 2012 would be used to disadvantage our original systems (yes both of them) already in place prior to that time. But this butchering of our system seemed to be not over yet:

Situation late 2017. With the proposed introduction of the Electricity and other Legislation (Batteries and Premium Feed-in Tariff) Amendment Bill 2017 Minister Hon. Mark Bailey (same minister) looked set to further diminish or disqualify our remaining meager export of 44 cent Kw/Hr FiT Solar Power into the Energex Grid. As already alluded to in the opening paragraphs, by Minister Bailey's definition, after 15th June 2017 if not already 'over-sized', PV modules would not be allowed to exceed the rated output of the Inverter they are coupled to. By definition our original panels easily over-clock their Inverter, amusingly an originally unneeded and now annoying legacy from Inverter down-size Energex, through amendment to the scheme, forced on us back in 2015.

To reiterate, since July 2012 eligibility criteria would not have realistically allowed us to correct any erroneous 'Agreement' paperwork anyway. To do so would of involved entering into a new 'Network Connection Agreement' thus needlessly throwing away our households 44 cent FiT entitlement. Anyway I'm given to understand by those in the Solar Industry, that despite Energex requiring notification of 'material' increases made to PV Generator's this task is largely ignored in relation to Solar Panels, there being (currently) no meaningful motivation or consequence to take the extra effort to do so. How ever the very same Modus Operandi of 2012 is again about to unfold with the proposed (2018) retrospective amendment to 44A (1). Then our historical PV panel rated capabilities may well exceed (like the two 1.7Kw Inverters did) whatever obsequious information Energex have come to rely on. Again we did not file this alleged document with Energex, nor have we ever seen it.

On this exact point I had sought clarification re compliance from Energex. In their response of the 29th January 2018 (Letter in full as attachment), Area Manager for Brisbane South Brian Uren, informs of 'Approved Capacity [being] 1.1KW'. This of course must refer the Inverter. Or does it? Latest Section 44A of 2018 (which has not been passed yet) refers to an 'aggregate' of components suggesting a holistic approach might be taken, inclusive of all other inputs. On the actual issue of Panel sizing Mr Uren says that 'Like for like replacement – Yes. Replacement with a larger size than currently approved – No.'

Mr Uren's letter does not directly mention the currently 'approved' sizing of the Panels as my inquiry had been hoping to uncover, but by making an oblique reference to the [sic]2.7Kw connection output originally in contention (It should of actually been 2.8Kw. PV 1 Inverter + PV2 Inverter. Not PV1 Inverter + PV2 Panels.)

Alarmingly during a subsequent phone call where I followed up on Mr Uren's letter, Mr Uren declined to supply any further written detail (Panels) reminding me that currently it is the Inverter dictating the limit on capacity, not the panels. Currently there is no enforceable restriction on the sizing of panels. Mr Uren remained firm that approved capacity based on the Inverter was (1.1Kw.). Does this mean a potential down-sizing of any replacement new 'like for like' panels once proposed legislation is passed? And where does that leave the original old panels, considerably larger than 1,100 watts, that have been in place all these years?

So despite Mr Uren's accurate but misleading letter stating we do not have to seek Energex 'approval' for 'like for like' installation of replacement panels, speaking on 1st February 2018 with Energex's 'Richard' (With whom I dealt in 2015 over the Inverter debacle), I am far from convinced and even alarmed.

Richard (Energex employee RC089) informs me that currently Energex has our property monitored for an average surplus to the Grid of 6.5Kw/day. Obviously there is no current provision for Energex to enforce any over sizing of PV's into qualifying Inverters. However should this Bill be passed as it is, even if tired old 2008/10 panels aren't to be replaced 'like for like', any anomaly to surplus feed in, for example fitting of gas appliances, new energy efficient fridges, going on holiday for extended periods, unusual periods of decreased cloud over. All could easily flag Energex a legitimate opportunity to investigate increased Solar input into the Grid.

I am verbally informed by 'Richard' that the Panel's Energex claim to have on record amount to just over 53% of what's actually installed (my estimate), therefore potentially forcing a further downgrade of our system to remain compliant. The 960watt Panel 'approval' Energex verbally claim as being on their original record is a long way short of the 30 KS60 Panels that have been feeding surplus into the Energex Grid via there Inverter since 2008/10. Not to mention the now disconnected 8 Suntech STP200's. So with Panels not being able to exceed Inverter maximum Inverter capacity, 1.1Kw of Panels is hardly a 'like for like' replacement in reality.

Following on from my original conversation of 1st February I was told by Energex's Richard (after consultation with, I assume, Mr Uren) that they would likely not pursue our 2015 throttled Inverter continuing with its 'oversized' original 2009/10 Panel arrangement. But they were less than enthusiastic when I mentioned old panel 'like for like' replacement with new. Consequently any aging 'like for like' Panel replacement is pointless if output is to be throttled to significantly less than originally fitted. I am left with the dismal prospect of being lumbered with our currently decade old panels with declining power yield over the next coming decade (until July 2028). But interestingly, even this verbal concession is in sharp disagreement to what my local State member Corrine McMillan (Mansfield) tells me of Energex, with her impression being that Energex has become livid with our households multiple compliance issues and would like to see our household loose its 'Premium' Solar feed-in entitlement altogether. Indeed under Section 44A (1A) (a), any new 'like for like' panels on our roof or in fact the currently existing panels would in fact be grounds for Energex to terminate our 44 cent FiT eligibility.

It is likely that my household is among the first to be potentially affected by this. But it is not difficult to imagine, should 44A (1A) Section 360 (2) be passed in its current form, other disgruntled Solar Bonus participants in similar circumstances will quickly come squealing out of the woods. But as Energex tightens its stranglehold on eligibility criteria by then it will be too late. With new panels installed and old ones dumped there will be no satisfactory evidence of prior 'like for like' entitlement in many situations. Our households two 1.7Kw SMA Inverters are already proof of this.

I strongly believe our Solar Suppliers (Solar Shop Australia and Ingenero) were tardy, having taken shortcuts on our two Generator installations. Paper work was not the only one, and I believe Ingenero suffered its bankruptcy as a direct result of having fitted cheap AC isolators to thousands of State Government owned Solar Modules. However

many of the technical compliance formalities were completed such as at least two, possibly three Electrical Work Requests to Energex. I'm advised by Andrew MacIntosh that this was indeed the case in his 2009 installation. So Energex cannot be totally unaware of our original 2008/9 equipment situation. Indeed I have hearsay Energex Electrical Work Requests totaling 2.8Kw were valid for our address before the August 2015 Inverter issue. But this whole process seems now to focus conveniently around one alleged historial document, inconsequential at the time but through subsequent and proposed legislation has been brought to wreck havoc and caused our household to be perceived as belligerent in pursuing an entitlement we had supposedly slyly arranged to exploit. All this over a decade after the event.

On 23rd February 2018 I was made aware of a new 2018 version of the Electricity and other Legislation (Batteries and Premium Feed-in Tariff) Amendment Bill which affects the wording of some of Section 44A. Under a new Minister (Hon Anthony Lyme) and, I'm told, a new submissions committee, I had just days to respond to this by yesterday (Monday 26th February).

Section 44A now (2018) has the insertion- (1A) (a) the maximum output of the component of the customer's qualifying generator that generates electricity exceeds, in aggregate, the approved total rated inverter capacity of the generator . . .

Specifically affecting our household is the 'policy objective' (Unamended in 2018 from the 2017 amendment), seeking to 'Clarify when additional generation systems. . . can be deployed in association with the Solar Bonus Scheme.'

From the 2017 'Explanatory Notes' this 'aggregate' can still be taken to mean- 'add generation capacity to their qualifying generator which exceeds the output of their system's inverter (i.e. oversize).' This explanatory note refers specifically to Clause 44A (i) which is separate and in addition to 44A (a). Oversize of course, refers to Panels. Consequently my former submission (referenced as Submission 002 A Kerr) addressing the Electricity and other Legislation (Batteries and Premium Feed-in Tariff) Amendment Bill 2017 and this 2018 Bill amendment still makes alleged entitlement to replace originally existing Solar PV Panels 'like with like' doubtful.

I have further tendered yet another 2018 submission to address this further amendment and again lay emphasis on the original problem which is still not addressed. This latest submission is currently before the Committee. They have, I'm told until 15 March 2018 to report back. The Electricity and other Legislation (Batteries and Premium Feed-in Tariff) Amendment Bill 2018 is then to have Priority before the house, slotted I'm told for March 20th-22nd. This leaves very little time until this Bill is potentially past which will leave our household to the animosity of those eager to strip us of the 44 cent tariff. Ultimately I am seeking written assurance BEFORE this amended Bill is past, that any 'like for like' replacement PV Panels at our address are actually allowed to reflect the specification of those they are actually replacing. In addition should the passing of 44A be allowed as it stands our household's FiT entitlement will most certainly be invalidated by those disparaging of the original scheme's participants. For your consideration and action,

Regards

Anthony Kerr For A C & K J Kerr

February 28th 2018



29 January 2018

Mr Anthony Kerr

Dear Mr Kerr

Thank you for you enquiry to the Mansfield Electorate Office in relation to your connected solar system. Your enquiry has been forwarded to myself the Area Manager – Brisbane South, to review and provide a response to. I understand you are seeking clarity on a couple of items:

- What is the capacity of solar Energex has registered at
- Are you able to replace your existing panels without effecting your 44c/kWH Solar bonus scheme

Approved Capacity at

is <u>1.1kW</u>

After a thorough investigation into Energex's systems and notes associated with the National Meter Identifier (NMI) QB060420157; in the name of Mrs Kayleen Kerr, of

It appears that Energex had received a Network Connection Application for a 'SMA SB1100 (1.1kW) inverter' by either the customer or their installer on 8 October 2008. This application was approved under the current Queensland Government legislated Solar Bonus Scheme and the Network Connection Agreement sent to the customer or their installer to sign and received signed copy was noted on 21 October 2008.

Our records show that in July 2015 Energex sent correspondence to Mrs Kerr advising of a potential Solar Bonus Scheme (the Scheme) breach due to a potential increase in solar capacity above the current approved capacity. Additionally, our records show you contacted Energex on 8 July 2015 to advise us that your wife had won a competition from Ingenero in 2010 for the installation of a second system. Unfortunately, our records do not support receipt of a second Network Connection Application form with the details of

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the additional 1.6kW system or that approval had been given by the business in the form of a Network Agreement for a total connection output at your premises above of 2.7kW (this is the 1.1kW initially approved plus the additional 1.6kW system) both would be required under the Scheme, for the 44c Feed-in-Tariff (FiT) to be retained.

Subsequently on 31 July 2015 Energex received notification from an electrician advising the second system had been disconnected and the 44c FiT reinstated to your account.

Are you able to replace your existing panels without affecting your 44c/kWH Solar Bonus Scheme

<u>Like for like replacement - Yes.</u> <u>Replacement with a larger size or adding additional panels than currently</u> <u>approved – No.</u>

In regards to the replacement of existing panels where the replacement panels are the same size, this will not impact your 44c FiT and you are not required to notify Energex. If you are replacing the panels with larger size or adding on more panels, a new Network Connection Application (outlining panel upgrade only) is required and this may impact your Solar Bonus Scheme.

Please note, in the event you need to replace your existing inverter like for like or even capacity for capacity (different model inverter same 1.1kW capacity) you or your installer will need to lodge a new Network Connection Application with 'replacement inverter not upgrade' selected on the form. This will ensure your FiT is not affected. Should you replace your inverter with one that is larger than the existing approved size, a new Network Connection form is required and this will impact your Solar Bonus Scheme FiT.

I hope this information clarifies the current Solar arrangements for

However recommend should there be any examples relating to your solar not addressed within this letter; please contact our Solar Team on 13 12 53.

Yours sincerely

Brian Uren Area Manager – Brisbane South Operations Field Delivery – Distribution

cc: Mansfield Electorate Office - Mansfield@parliament.qld.gov.au

From:	
То:	Public Works and Utilities Committee
Subject:	Submission: Electricity and other Legislation (Batteries and Premium Feed-in Tariff) Amendment Bill 2017
Date:	Monday, 3 July 2017 12:22:29 PM

Submission: Electricity and other Legislation (Batteries and Premium Feed-in Tariff) Amendment Bill 2017

Relevant Historical Background:

Motivated by Bligh Government incentives our Household back in 2008/9 had two Photo Voltaic (PV) system's professionally installed totaling 3.4Kw maximum output. These were connected to the Energex Grid. Both directed surplus Electricity back to the Grid for which we were paid the proscribed 44 cent/Kw hr. Solar Bonus Feed in Tariff (FiT) by the Electricity Distributor.

Nearly six years pass. July 2015. We were directed by the Electricity Distributor (Energex) to dramatically reduce our generation capacity into the 44 cent Kw. hr. Grid. By cunningly waiting until after an amendment to the original 2008 scheme had been made mid-way through 2012, Energex had been able to enforce a provision that would have held no prior consequence. Protest and appeal was made to Ministerial Office, Hon. Mark Bailey Minister at the time. A delegated reply was received from the Energy and Water Commission stating they would not 'Intervene'.

Current situation:

June 15th 2017. Minister Hon. Mark Bailey (same minister) looks set to further diminish or axe our remaining meager export of 44 cent FiT (now so called 'Premium') Solar Power into the Energex Grid.

Concerns over the retrospectively proposed 2017 Solar Rebate Amendment are:

In relation to Section 44A (1A) and SPECIFICALLY Section 360 (2) containing a so called EXEMPTION.

Minister Bailey proposes prohibiting 'over sizing' of PV modules (Solar Panels) for those not already 'over sized' by 15th June 2017. (At least for those wishing to maintain eligibility for 'Premium' tariff.)

By Minister Bailey's definition, after 15th June if not already 'over-sized', PV modules will not be allowed to exceed the rated output of the Inverter they are coupled to. By definition our panels easily over-clock the Inverter they are connected to, amusingly a direct legacy from Inverter down-size Energex forced on us back in 2015. It should go with out saying that our Inverter will not allow our panels to exceed Energex's maximum export into the Grid. For the record, since July 2015 this has been a very modest 1,100 Watts. It should also be noted the ability to over-clock our 'approved' Inverter is very limited. Maximum PV string voltage and current cannot be exceeded without risk of damage or destroying the Inverter itself. This gives a useful maximum over-clocking potential in a robust quality made unit of around 25%. (Energex advise me they will not approve use of newer Export Limit software Inverters for 'Premium' tariff scheme participants. I assume this is to thaw potential to massively over panel these units, but means smaller Inverters such as ours, which are no longer manufactured or refurbished, will be increasingly difficult to source on failure.)

Disturbingly on contacting Energex I am informed that they do not officially know the

out-put capabilities of the Solar PV panels attached to our roof. Nor apparently do they typically reliably know Solar out-put on other roofs. No doubt new installs will now be more carefully documented in the future! Historically interest has always been in the INVERTER as the systems bottle neck limiting the maximum export, when available, into the Grid. Energex until now has shown little interest in the average maximum that would be obtained over time by 'oversizing' panels. Therefore the Hon. Mark Bailey looks set to rely on information that is not even reliably available from the energy distributer. For our part, reliance on historical Installer documents (still in existence) that might otherwise act as proof of our Panel specification, form part of Invoices that were not held valid by the ministers office last time the distributor required our system be throttled (Inverter/Installer issues) to maintain our 'Premium' tariff.

My discussion with Energex involved them remotely viewing our installation, I assume with the help of Google Earth or the like. Our roof is expansive. Most of the North facing surface is littered with an assortment of around 38 PV panels originally installed to support the two 1.7Kw Grid tied Inverters back in 2008/9. This landscape has not physically changed since about 2010. From the street and from the point of view of an Energex employee our array of Solar Panels looks more impressive than its now feeble export to the Grid would suggest. But will all this end amicability with the Ministers intended amendment regards 'oversizing' into the Grid? Energex have already said they would be able to check our historical exports to their Grid and be alerted to any irregular pattern. (They skillfully waited nearly six years for an amendment change for this exact opportunity last time!) Our Household has already been bitten once by obsequious application of amended rules. For those like ourselves receiving the 'Premium' tariff, this method is fraught with potential for a cunning regulator looking for any excuse to minimize or disqualify an expensive 'Premium' Solar Bonus participant.

Take our actual example. Our PV panels have been operating now for about close to a decade. Despite marketing hype a twenty-five year out-put warranty is usually worthless. In the real world PV power delivery degrades over time. PV modules deliver maximum rated out-put only when new, and then only in ideal sunny conditions. Panels slowly die over time, eventually giving mediocre out-put even on a sunny day. Any cloud cover, in the early morning or evening or in winter sun, average performance only gets worse. Over-sizing can help mitigate this.

Unsurprisingly our PV panels have degraded since fitted in 2008/9 and our export to the Grid has now fallen to a Summer/Winter average of around 6 kilowatts a day. Unlike the average Queensland household with an average consumption of 15 kilowatts a day, we do not squander energy. Never the less this surplus 6 kilowatts into the Grid is still bugger all of what new panels could be capable of. This 6 kilowatts will only erode further as our elderly panels get worse, a situation to gladden the ministers financial aim I'm sure. Since the 'Premium' tariff scheme still has around eleven years to run I had soon expected to replace weakening existing panels with new. This will be expensive, new panels being ineligible for federal REC credits on our aging Inverter. This should be noted by those labeling a 44 cent green energy tariff 'Exorbitant' and easy money.

Under the Hon. Mark Baily's proposal, if fitted Energex will alert themselves to increased out-put of these new panels. Applying Section 44A (1A) of the ministers new bill we would have:

'Added generation capacity to (our) qualifying generator which exceeds the output of (our) systems inverter.'

Under Section 44A (1A) (a), This is grounds to terminate our 44 cent FiT eligibility. Assurances that this would not happen do not convince me otherwise. Our household has already fallen victim to the Energy regulators changing mood before, back in July 2015. Despite the Palaszczuk Governments apparent commitment to retain the scheme through to 2028, our household is a very real example of how genuine original participants have and are still being systematically and incrementally disadvantaged by a Clean Energy scheme that now seems to have morphed into a financial liability and an embarrassment for the Government. Also under Section 44A (1A) (c), It seems we will not be able to operate our 3.8Kwatt AEG Petrol Generator 'on the same installation' (The exception would be when there is a Grid power outage). Doing so under this section will again risk our 'Premium' Solar tariff entitlement. Therefore the proposed legislation is ambiguous shortly after when it attempts clarification by stating that it and/or an 'additional generator or battery' can be attached to an electrical installation which is different to the one that (our) Solar Bonus Scheme qualifying generator is attached to.'

As Section 44A (1A) (c) clearly states we would be able to add these items but utilizing a different installation. 'Installation' is not defined but by my reckoning it would suggest being an 'installation' electrically isolated from the Grid and its electrically connected House circuits. But I could conceivably expect it would be able to exist as a separate and independent entity in the same dwelling, and not necessarily as an Installer circular seems to of interpreted, need to be in a separate Grid isolated garden 'shed' or the like.

But whether in the same dwelling or as a separate structure. Both clearly contradict the spirit of the 'Policy Objectives' in the amendments preamble. Where the intention is brazenly clear for the elimination of any additional electrical supply competition, whether it is isolated electrically or not. Be that competition additional Photo Voltaic, Fossil Fuel generator or Battery Storage. Given that, the actual wording of 44A (1A) (c) could be interpreted as either support of the Palaszczuk Governments November 2016 commitment to 'Not strip households of the 44ϕ tariff if they connect battery storage technology.', or the exact polar opposite.

But what has become crystal clear during my households on-going participation in this illconceived scheme, is the under-handedness we have been dealt through political slight-ofhand. Our local MP Ian Walker quipped back in 2015 of our original 2008 Solar Connection Agreement that as a legal document it didn't stand for much. With time and hindsight how very true and accurate his words have come to resonate.

For your appropriate and careful consideration,

Anthony Kerr

For A C & K J Kerr

