

sonnen

Genevieve Schulz
Australian Energy Market Commission
GPO Box 2603
Sydney, NSW 2001
(Lodged online)

11.04.24

[sonnen Australia feedback on Unlocking CER Benefits Through Flexible Trading Rule Change draft determination](#)

Dear Genevieve,

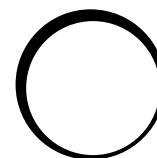
sonnen Australian (sonnen) is pleased to provide a response to the AEMC's Draft Determination (ERC0346) and supports the objectives of this regulatory reform at this critical time of a consumer-led system transition. sonnen acknowledges the Commission's proactive efforts in fostering a regulatory environment that will enable an orderly, well-governed transition.

sonnen's Virtual Power Plant (VPP) supported electricity retail products and market ancillary services provision activities provide unique, real-world, Behind-the-Meter (BtM) insights of Australia consumers.

sonnen supports the work done by the Commission to facilitate new meter types with lower minimum specifications that enable technology with in-built measurement capability to be used for settlement and billing. sonnen support National Measurement Institute approval of type 8 or 9 metering devices, and the option for AEMO to relax the maximum allowable error to accommodate evolving technologies subject to requirements of the National Measurement Act.

sonnen's customers regularly engage with our device portals to better understand and manage the energy needs of their household. sonnen expect the option to view a display of cumulative total energy measured by a secondary metering installation via a web portal/mobile App to be well received, if not more preferable than the current arrangements for type 4 *metering installations*.

sonnen has provided the AEMC with two previous submissions on workstream ERC0346. The draft determination explicitly excludes small customers from enjoying the same benefits from multiple energy service providers afforded to larger customers. sonnen's experience is that this issue speaks to risk management; we seek a fair playing field and see it appropriate to place the 'right risks into the right hands' - that is, risks of appropriate scale to entities with proven BTM expertise.



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Household's spending 10's of thousands of dollars on CER (PV, batteries, EV chargers, energy management systems) are making highly informed decisions and are ready to embrace new business models. The rate of technological change and innovation in 'flexible CER' is outstripping the capability of traditional electricity retailer business models to adapt, and sophisticated small consumers who have made significant investment in the renewable energy transition are being denied the opportunity to engage with new innovative models tailored to deliver value to those households.

Thank you for considering this submission. We look forward to continued participation in the consultation process. If you have any queries about this submission please contact Veryan Hann, Regulatory & Public Affairs Manager at v.hann@sonnen.com.au.

Kind Regards

Alister Alford

Director, Wholesale and Flexibility Markets
[sonnen Australia Pty Ltd](#)