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**Submission in Support of the Proposal to Amend the
National Electricity Rules for Connecting Embedded Generators**

Dear Ms Lai,

Thank you for this opportunity to comment on the proposed amendment to the National Electricity Rules for Connecting Embedded Generators.

Utilitas Pty Ltd is the first specialist bioenergy (biogas) project developer in Australia. We provide organic waste owners and managers in rural, regional, urban, industrial and mining communities with complete bioenergy solutions from concept to commissioning including financing.

Utilitas has pioneered the modularisation of world class anaerobic digestion (AD) technology (known internationally as "biogas technology"). We have developed a comprehensive technical and financial model, extensively surveyed and developed relationships and trust in the market, structured the asset model and brought together an entire supply chain of capability to build, own and operate a substantial portfolio of biogas assets in the nascent Australian biogas market.

We are only in our early stages of development and four of our five current projects are based in our home state of Queensland. The Queensland Government has made substantial commitments to increase renewable energy generation capacity. However, in practice the processes, rules and regulations surrounding network access for embedded generators, are rendering connection of distributed renewable generation unviable through the imposition of unreasonable delays and costs.

Our experiences mirror the concerns raised in the submission to the AEMC by Climate Works Australia, Seed Advisory and the Property Council of Australia and demonstrate that these issues are also being experienced in other states such as Queensland, and in a non-urban context.

We fully support the proposed rule changes and any other initiatives that will facilitate a level playing field for embedded generators seeking to connect much needed renewable energy assets of between 100kWe and 20MWe.

If you would like to discuss any aspect, please contact me on 0405 105 852.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Fiona Waterhouse', is written over a light blue circular graphic that is partially visible from the Utilitas logo.

Fiona Waterhouse
Chief Executive Officer
Utilitas Pty Ltd