

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted online

27 April 2015

Dear Mr Pierce,

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Re Optional Firm Access Review 'EPR0039'

Thank you for the opportunity to comment on the Draft Report Optional Firm Access, Design and Testing. As the peak body for the community services sector in South Australia, SACOSS has a long-standing interest in the delivery of essential services. Our research shows that the cost of basic necessities like electricity impacts greatly and disproportionately on vulnerable and disadvantaged people. Our advocacy is informed by our members; organisations and individuals who witness these impacts in our community.

SACOSS made a submission on the first interim report for this Review. Our submission noted that OFA is seen as having the potential for more efficient decision making, especially when the need for transmission infrastructure is driven by the investment decisions of generators rather than directly by the consumption demands of consumers (which, as is increasingly being seen, can be met from a number of generation sources embedded in the distribution network). We stated that if OFA does not progress then a viable alternative to the status quo must still be pursued.

We accept that the Draft Decision has determined that in the current environment implementation of OFA would not contribute to the achievement of the National Electricity Objective. However, we note that the Commission has developed, refined and enhanced the OFA model so that in the right circumstances, the OFA model could be implemented in the NEM. We also welcome the decision of the Commission to further review either simplified versions or alternatives to OFA prior to producing the Final Report.

We thank you in advance for your consideration of our comments. If you have any questions relating to the above, please contact SACOSS Senior Policy Officer, Jo De Silva on 8305 4211 or via jo@sacoss.org.au.

Yours sincerely,



Ross Womersley
Executive Director