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Joel Aulbury
Senior Adviser
Australian Energy Market Commission
PO Box A2449
Sydney South, NSW 1235

16 September 2021

Dear Joel,

Re: Integrating energy storage systems into the NEM (ERC0280)

Akaysha Energy (Akaysha) welcomes the opportunity to comment on the National Electricity Amendment (Integrating Energy Storage Systems into the NEM) rule options paper.

Akaysha are in principle supportive of rule changes that allow for and incentivise greater uptake of next generation energy technology, in a way that is most productive for the energy market and consumers. Several of the views of Akaysha have already been addressed via other stakeholder submissions to the Options paper, so we shall only emphasise our key position in this letter.

TUOS and DUOS charges:

Akaysha must stress that blanket implementation of TUOS and DUOS charges to battery energy storage systems as part of the proposed hybrid system will slow investment in the technology. However, it is well understood that as net users of energy, batteries are using services provided by Transmission Network Service Providers and Distribution Network Providers, and thus some application of TUOS and DUOS is not unthinkable. It is the preference of Akaysha that *if* TUOS and DUOS exemptions for battery energy storage systems are not codified, then TUOS and DUOS charges are applied to relevant sites and systems in a flexible and considered way, where the dynamic operating profile of a battery and the benefits such a system may bring to the local network are accounted for.

Sincerely,

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