

**From:** Greg Hutchison  
**Sent:** Friday, 20 February 2009 5:55 PM  
**To:** ICRC  
**Subject:** Draft Feed in Tariff Code

Secretariat  
ICRC

I wish to make some comments about your FIT code and residential pv solar generation in general.

Issues that concern me are:

1. Lack of clarity in methodology for requesting the electricity provider to accept the pv systems and pay the FIT. There are well defined procedures for having ACTEWAGL connect pv systems to the grid. There are also systems to enable us to contact a provider and have our electricity provider by them. But asking a provider to accept your pv system and for them to start paying us are vague.
2. The 20 year contract that is supposed to be struck when you first connect your pv system needs better clarity. What happens if you move to another retail supplier? Do they have to start a new 20 year contract or is a pro rata arrangement used?
3. The FIT legislation doesn't really cover what happens if the home owner decides to move house within the ACT. I presume if the owner left the system in place the new owner could continue the arrangement. At the new premises the mover would have to start again if he wished to install a new system. But what happens if the owner de-installs the pv system and has it re-installed at the new premises. Can he continue the 20 year contract. If it was consider that such a contract was now null and void what tariff would apply. Is the FIT still applicable? Some have suggested to me that if you received the Federal Government \$8000 rebate then you have to have the system installed for 5 years at that premises. My reading of their rules indicates that they don't care where the premises is but they require access for 5 years to ensure your tax affairs match the requirements. Removing a system is quite feasible and not technically difficult.
4. The applicability of billing is not well defined in your code. The gross tariff is just that. You get paid for what you generate and then you pay the provider fir what you use. There is some benefit in the owner getting a credit for FIT electricity. However there should be a clear distinction between the supply billing and the generation billing. The householder should in reality be billing the supplier. Somehow the issue of GST should be carefully considered and the overall transaction should not end up with the householders paying GST on his electricity used plus GST on the electricity he supplied. In effect the householder is a small business and should be charging the electricity provider the value of the pv energy plus GST and remitting that to the ATO. This is impractical I guess and so I assume the ideal system is one bill with appropriate debits and credits.

Regards  
Greg Hutchison