



23 February 2009

Ms Shelley Schreiner
Chief Executive Officer
Independent Competition and Regulatory Commission
GPO Box 975
Civic Square ACT 2608

Dear Ms Schreiner

DRAFT INDUSTRY CODE: Electricity FEED-IN CODE

Thank you for your correspondence to Karen Moses of 23 January 2009 inviting comments on the Draft Electricity Feed-in Code as established under the ACT Electricity Feed-in (Renewable Energy Premium) Act 2008.

Whilst Origin is cognisant of the Electricity Feed-in Code's intent to set down the practices and standards for the operation of the scheme, Origin has some concerns with administrative aspects of the Electricity Feed-in Code.

With respect to the notification from the electricity distributor to the electricity supplier as to the start and end dates for the 20 year feed-in period at the premium rate, clarity is sought on:

1. The timing of the notification - at what point in the process does the electricity distributor advise the electricity supplier? It would need to occur at least one month prior to the customer's bill date to allow systems to be updated to record the relevant details.
2. Provision of consumption data and associated feed-in credit - how will this be provided to the electricity supplier? Will this be in the form of a 'negative' network tariff and provided in the electricity supplier's network bill?

Section 4.1 of the code indicates that the Network Use of System Agreement will apply to distributor actions as far as possible and that a statement of terms on which it will provide the distributor's actions will be provided to the electricity supplier upon request. It is suggested that the Use of System Agreement be updated to provide a clear set of terms that apply to the requirements of the Electricity Feed-in Code and that such terms are agreed between the electricity distributor and the electricity suppliers.

The draft Code requires electricity suppliers to provide a statement as to the terms on which it will provide the supplier actions to an occupier. Origin suggests that the terms provided on the website are the standard terms and that the Code acknowledges these can be varied by mutual agreement between the electricity supplier and the occupier.

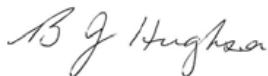
Origin agrees it is the occupier's responsibility to apply for the feed-in tariff. It is Origin's understanding that any feed-in tariff would only commence from the time of application for such a tariff by the occupier. This would apply to both existing and new installations. Origin requests that this be reflected in the Code.

Origin suggests that the data being requested from the electricity supplier, as detailed in Schedule 1, can be derived from the reports to be provided by the electricity distributor. Should such reporting be required, Origin cannot see the justification for quarterly reporting. It is suggested, that in the interest of removing unnecessary regulatory burden, the reporting timeframe be biannual.

In section 3 of the Information Paper provided with the draft Code, it indicates that the Commission has moved to amend the individual licences of all electricity distributors and electricity suppliers to take into account the requirements of the Electricity Feed-in Act. Origin looks forward to providing input to the proposed changes to these licence arrangements.

Should you have any questions on the matters raised in this correspondence please contact Malcolm Hempel on 03 9652 5984.

Yours sincerely



Beverly Hughson
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Retail