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25 October 2013

Essential Services Commission of South Australia
GPO Box 2605
Adelaide 5001

Dear Sir / Madam,

RE: Review of the solar feed-in tariff premium

The Clean Energy Council welcomes the opportunity to respond to the Essential Services Commission of South Australia's Draft Determination on the *Review of the Solar Feed-in Tariff Premium*.

We are pleased to note that you have recognised competition issues and have recommended against deregulation of feed-in tariffs in 2014. We welcome your decision to implement a formal price-monitoring regime with a view to further reviewing your regulatory approach prior to 2015.

As part of your review we would urge you to consider regulating for a time-varying feed-in tariff, which is the approach being contemplated by Victoria's Essential Services Commission. We strongly urge you to consider the merits of a technology-neutral, time-varying feed-in tariff that is at least equal to the value of that energy in the relevant electricity market and the relevant electricity network it feeds into, **taking into account the time of day** during which energy is exported. This should include a payment at critical peak periods commensurate with the prevailing wholesale electricity price at that time.

For further information please contact me at DGladman@cleanenergycouncil.org.au.

Yours sincerely,

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Darren Gladman
Policy Manager