

Company	Company Description	Support LNGC?	Argument	Quotes?	Sub link	Other notes				
AGL Energy	Gentailer and renewable energy producers	No	Too complex		http://www.aemc.gov.au/getattachment/45457d91-69c2-4557-98ee-c090adff48cb/AGL-Energy.aspx					
Almondco Australia	Heavy regional users (food processing)	Yes	Current electricity prices and anticipated increases threaten the viability of their business.	Indirect pressure via LGNC will not only "keep the bastards honest", but provide the necessary incentive for business such as ours to invest in alternative generation options to assist with stabilizing prices.	http://www.aemc.gov.au/getattachment/0962e89e-2e7e-4dfb-9cb7-c7c4dd062207/Almondco-Australia.aspx					
APA Group	Natural gas transmission network owner	Yes	Obvious self interest - embedded generators using gas!		http://www.aemc.gov.au/getattachment/d9eb1430-6627-483e-a929-3b1d359ce32c/APA-Group.aspx					
Ausgrid	DNSP in NSW	No	Other rule changes applied or under consideration (eg cost reflective tariffs) will achieve the same effect.		http://www.aemc.gov.au/getattachment/7daaed34-aa29-43c1-947e-73242753dbcd/Ausgrid.aspx					
Ausnet Services	DNSP in Victoria - electricity and gas	Yes and No		To enable a network to defer investment due to embedded generators, there needs to be a guarantee that the generation will be available at peak demand times. This reduces the value of some sources of embedded generation, such as solar and wind.	http://www.aemc.gov.au/getattachment/fee9b7f9-31eb-459e-8a7b-ef280546e287/AusNet-Services.aspx					
Australian Gas Networks	Natural gas distribution	Yes	Obvious self interest - embedded generators using gas!		http://www.aemc.gov.au/getattachment/cd9e6400-a139-44b5-be5b-b545e1eff49e/Australian-Gas-Networks-8-February-2016.aspx					
Australian Sustainable Built Environment	Peak body for sustainable built environment businesses	Yes	Existing rules, regulations, and technology have created many anticipated and unanticipated barriers to the uptake of distributed generation.		http://www.aemc.gov.au/getattachment/9aa0a33a-ac11-4f03-9ad1-150f513b6cc4/Australian-Sustainable-Built-Environment.aspx					
Bass Coast Shire Council	Regional council	Yes	Rule change will correct the inequities in the system which favours centralised generators.		http://www.aemc.gov.au/getattachment/396bac46-a55d-4836-b870-6551a20c989c/Bass-Coast-Shire-Council.aspx					
Brookfield Flow Systems	Water and energy infrastructure provider	Yes	The proposed rule change is critical to enabling innovation and competition in the energy market – driving down costs to consumers, government and developers.		http://www.aemc.gov.au/getattachment/44eebd20-18f9-4ff7-a56b-4c8584ac125b/Brookfield-Flow-Systems-9-February-2016.aspx					
Byron Shire Council and Sustain Northern Rivers Energy	Regional association of councils	Yes	Very important as the cost to deliver electricity from local generators to regional customers is significantly lower than the cost to deliver electricity from large remote power plants.		http://www.aemc.gov.au/getattachment/8db52a0e-fd87-408b-8235-98155484af7d/Byron-Shire-Council-and-Sustain-Northern-Rivers-En.aspx					
Central Irrigation Trust	Heavy user customer associatio	Yes	Networks have ignored available mechanisms to innovate.		http://www.aemc.gov.au/getattachment/dbec2109-cb23-4ec6-9575-d1a6a39b345e/Central-Irrigation-Trust.aspx					
Centre for Energy and Environmental Markets	Energy and environmental "thinktank"	Yes	Current NEM arrangements do not provide an economically efficient basis for choices between centralised and distributed generation.		http://www.aemc.gov.au/getattachment/6bb04e23-7711-4efb-9201-603da463cd0b/Centre-for-Energy-and-Environmental-Markets--UNSW.aspx					
City of Sydney	City council, joint proponent.	Yes	There are insufficient regulatory incentives for decentralised generation at the current time		http://www.aemc.gov.au/getattachment/d163ba4e-0071-49d8-b340-57e0813bcc32/City-of-Sydney.aspx					
Clean Energy Council	Peak body for clean energy businesses	Yes		Although the CEC supports the exploration of this option its success will be dependent on effective regulation and a centralised approach to the calculation methodology. It is possible that transaction costs may easily outweigh benefits if this is not well managed.	http://www.aemc.gov.au/getattachment/e72c83ac-fdac-4631-9eeb-10e54fba564a/Clean-Energy-Council-8-February-2016.aspx					
Cotton Australia/NSW Irrigators Council	Heavy user customer association	Yes	Networks have ignored available mechanisms to innovate.	However we wish to highlight that to date, we have seen little evidence that would indicate the networks are willing to make use of these available "mechanisms" to deliver significant change to their investment decisions.	http://www.aemc.gov.au/getattachment/fe9617d3-afe2-401b-a864-b79c977c325f/Cotton-Australia-NSW-Irrigators-Council.aspx					
CS Energy	QLD government owned generator	No			http://www.aemc.gov.au/getattachment/03a8fb17-4e73-4720-8372-bf41a5f0eb8c/CS-Energy-9-February-2016.aspx					
Dept of State Development South Ausralia	State government department	No	Will result in higher network charges for all customers, including those with EG.		http://www.aemc.gov.au/getattachment/9532f8ba-cdd2-4f7e-982f-352f89050f05/Department-of-State-Development--South-Australia.aspx					
Eastern Alliance for Greenhouse Action	Regional association of councils	Yes	Current rules emphasis price rather than total cost and are biased toward central generation and distribution by networks.	The proposed rule change provides an elegant response to compensate for this bias and should result in small (incremental) changes that can be scaled over time.	http://www.aemc.gov.au/getattachment/2f06dfa8-24f3-4544-989d-3ea73592309f/Eastern-Alliance-for-Greenhouse-Action.aspx					
Endeavour Energy	DNSP in NSW regional areas	No	Will lead to inefficient investment and higher network charges for uncertain benefit to all customers.	The issues identified by the proponents are immaterial as the value of any cost reflective credit is likely to be negligible and potentially positive where the network costs outweigh the benefits	http://www.aemc.gov.au/getattachment/0b32518c-40b8-46ac-b72b-05d0eade3d04/Endeavour-Energy.aspx					
Engorex	Retailer in QLD	No	Current NER is sufficient		http://www.aemc.gov.au/getattachment/a1a97117-1ac6-4ba6-9e4e-78b3b888105/Engorex.aspx					
Energy Australia	Gentailer	No	The proposal as a poorly targeted and unnecessary measure that will only serve to impose additional costs on distributors rather than driving efficiencies in the provision of network services.		http://www.aemc.gov.au/getattachment/54c75aeb-7d14-42e5-9162-3c1e07220a1b/Energy-Australia.aspx					
Energy Consumers Australia	Policy and advocacy for energy c	Yes, / but...	EG should not receive all the benefit	At its simplest the proposition advanced by the rule change proponents is based on the assumption that embedded generation can provide services that can reduce the need for investment by networks. However, the proposition that the entire cost saving (if any) to networks should be passed through to the embedded generator does not promote the long term interests of consumers because the aggregate network cost does not decline (because the avoided cost is converted to an operating expense).	http://www.aemc.gov.au/getattachment/f527c21b-66e1-45a3-a8af-066eaaea9ece/Energy-Consumers-Australia.aspx					
Energy Efficiency Council	Policy and advocacy for energy efficiency	Yes and No	LGNC just part of what needs to be considered		http://www.aemc.gov.au/getattachment/404d6101-8ab0-4630-afdd-06cdc5d277e/Energy-Efficiency-Council.aspx					
Energy Networks Association - Frontier Economics	Generator/DNSP lobby group	No	Complexity and cost, doubtful benefits to non EG customers	the specific rule change proposal made by the proponents, with its mandatory nature, features and characteristics is likely to promote the long-term interests of consumers.	http://www.aemc.gov.au/getattachment/a8c174c2-a5a2-4e2d-bb95-4041f2984d94/Energy-Networks-Association.aspx					

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Energy Networks Association - Frontier Economics	Generator/DNSP lobby group	No	Complexity and cost, doubtful benefits to non EG customers	EG can also create additional costs to DNSPs and the broader energy market as market participants and the Australian Energy Market Operator (AEMO) seek to accommodate increasing levels of (and potentially volatility in output from) EG.	http://www.aemc.gov.au/getattachment/6916f3a3-31d9-457b-8228-5530b64e1fcf/Energy-Networks-Association-Frontier-Economics.aspx					
Ergon Energy	DNSP in QLD	No	Fully supports ENA submission		http://www.aemc.gov.au/getattachment/82df1690-932a-456e-a669-f5d9fee13729/Ergon-Energy.aspx					
Essential Energy	DNSP	No	Proposal will lead to inefficient investment and cross-subsidies between customers.	Proposed rule change would likely result in inefficient deployment and investment in embedded generation, increased network charges and cross subsidisation of network prices between customers.	http://www.aemc.gov.au/getattachment/a8042d50-7df6-49ff-a851-df57cb8668b2/Essential-Energy.aspx					
Ethnic Communities Council of NSW	Lobby group	Yes	Would provide alternative to possibly inefficient investment in local storage		http://www.aemc.gov.au/getattachment/86e06550-6549-4869-bb59-33677f0aba2d/Ethnic-Communities-Council-of-NSW.aspx					
GDF Suez Australian Energy	Generator	Yes and No	Complexity and cost, doubtful benefits to non EG customers		http://www.aemc.gov.au/getattachment/5695c936-2292-4b5a-bd39-0aa3084fa968/GDF-Suez-Australian-Energy.aspx					
Go Energy Pty Ltd	Energy Retailer	Yes	Opportunity to provide incentive for renewable generation that is not "network Centric"		http://www.aemc.gov.au/getattachment/e5b4598d-58a1-42d8-a552-7d349148cc40/GO-Energy-Pty-Ltd.aspx					
Goulburn Broken Greenhouse Alliance	Regional association of councils	Yes	Pricing structures for small scale embedded generators is inadequate and unfairly undervalued.		http://www.aemc.gov.au/getattachment/106e939a-c27d-4bb4-b789-ea8ac6f09dd1/Goulburn-Broken-Greenhouse-Alliance.aspx					
Groundswell	Environmental lobby group	Yes	Litany of local problems due to existing rules and remote generators		http://www.aemc.gov.au/getattachment/dc756bfe-15d8-47d9-9451-bc547c5c312d/Groundswell-16-February-2016.aspx					
Institute for Sustainable Futures	Environmental academic	Yes	To ensure that consumers and generators are charged appropriately for partial use of the electricity network. • To incentivise local generation when this reduces network congestion; • To de-incentivise the duplication of infrastructure, including private wires and generation/ storage systems, set up to avoid network charges altogether; and • To offer an effective alternative to load deflection, in order to maintain utilisation of the existing electricity network infrastructure.	Potential incentives for inefficient duplication of network infrastructure under the current NER, including costs borne by parties other than network businesses.	http://www.aemc.gov.au/getattachment/98f80e4e-f13c-4bb1-9190-42eeb67ac36d/Institute-for-Sustainable-Futures.aspx					
Jemena Electricity Networks (Vic) Ltd	Network maintenance contractor	Yes			http://www.aemc.gov.au/getattachment/771599a5-616c-4dd6-a8af-6c021e907bdc/Jemena-Electricity-Network-(VIC).aspx					
Local Government Infrastructure Services	Infrastructure consultant to local councils	Yes			http://www.aemc.gov.au/getattachment/2557190d-189c-4a12-9a91-546bd6a4c4da/Local-Government-Infrastructure-Services.aspx					
Mirvac	Property developer and construction	Yes and No	Proposal needs to be expanded to include other factors		http://www.aemc.gov.au/getattachment/26c2a243-3ad9-46a0-be5e-a5b1ef0be25/Mirvac.aspx					
Moira Shire Council	Regional Council	Yes	Will reduce vulnerability of remote electricity consumers		http://www.aemc.gov.au/getattachment/5bc45884-9ada-453c-80e9-9b70079bffb6/Moira-Shire-Council.aspx					
Northern Alliance for Greenhouse Action	Environmental lobby group	Yes	Pricing structures for small scale embedded generators is inadequate and unfairly undervalued.	The National Electricity Objective (NEO) is no longer appropriate to the current and future Australian energy market. The NEO does not recognise the interest of the community at large and confines consumer interests to economic interest alone.	http://www.aemc.gov.au/getattachment/3d4dfe1f-1528-400f-867d-7768607fd5da/Northern-Alliance-for-Greenhouse-Action.aspx					
Origin Energy	Generator	No		It will involve a high level of complexity and administrative cost relative to the benefit.	http://www.aemc.gov.au/getattachment/17868173-e5ed-4c0b-b6f1-e35f335d06c2/Origin-Energy.aspx					
Property Council of Australia	Peak representative of property developers and owners	Yes	LGNC is consistent with the NEO aim of efficient investment in and operation/use of electricity services in the long-term interest of consumers.		http://www.aemc.gov.au/getattachment/a699686f-71a5-4e1b-8bfc-cebd7211325/Property-Council-of-Australia.aspx					
Public Interest Advocacy Centre	Non profit provider of legal advice and policy development	Yes	Will provide equitable return on investment		http://www.aemc.gov.au/getattachment/c1da10a6-50fc-4bf0-a845-b6c59464e71b/Public-Interest-Advocacy-Centre.aspx					
Renewable Newstead	Regional town renewable advocate	Yes	Will encourage move to decentralised generation		http://www.aemc.gov.au/getattachment/4897f99f-4c7e-4b3c-9027-acc86a27130c/Renewable-Newstead.aspx					
Riverland Energy Association	Regional association of electricity users	Yes	LGNC will encourage economic development		http://www.aemc.gov.au/getattachment/dd4a6697-d2e3-4328-9681-e28d8349a65b/Riverland-Energy-Association.aspx					
SA Power Networks	Monopoly DNSP	No	Already high penetration of EG in state - no further incentive required		http://www.aemc.gov.au/getattachment/108db193-fa46-44d5-a55a-4a796a3a37eb/SA-Power-Networks.aspx					
Solar Energy Industry Association	Industry association of solar installers	Yes	Encourages small embedded generators to remain connected to the network and investment in innovation		http://www.aemc.gov.au/getattachment/000ae2af-322f-4764-a838-3c420ecf7465/SEIA.aspx					
Snowy Hydro Ltd	Regional supplier of renewable energy	No			http://www.aemc.gov.au/getattachment/d1c44e48-501a-49f0-9f1a-09ff7d56c988/Snowy-Hydro-Limited.aspx					
Stanwell	QLD Govt owned generator	No	The proposal is arbitrary, and smaller DEG do not reduce cost for the network. Existing measures should be considered.		http://www.aemc.gov.au/getattachment/4c5ff51b-d300-4793-89ba-d172e6eba6b0/Stanwell.aspx	Short sub - 1 page. Stanwell a member of Competitive Energy Association				
Southern Sydney Regional Organisation of Councils	Regional association of councils	Yes	Current arrangement unfairly biased in favour of DNSPs, and do not account for the economic value of local generation.		http://www.aemc.gov.au/getattachment/34380251-49cd-4bc1-b817-d912eb0919a3/Southern-Sydney-Regional-Organisation-of-Councils.aspx					
Swan Hill Rural City Council	Regional council	Yes	LGNC encourage development and permit some level of independence from remote generators		http://www.aemc.gov.au/getattachment/dc0b44db-bf68-4cdf-8b52-2867e0a692f1/Swan-Hill-Rural-City-Council-11-February-2016.aspx					
Sydney Water	Urban water and sewerage supply authority	Yes	Would allow them to generate income from sites that have space for solar but little demand for power.		http://www.aemc.gov.au/getattachment/3ecbaf6c-ba8e-46d3-8beb-2fb7a27108d7/Sydney-Water-17-February-2016.aspx					
Tasmanian Renewable Energy Alliance	Industry association of solar installers	Yes		We support the proponents proposed principle that consumers should only pay for the extent of the network that they use and believe the AEMC should support this principle as part of the move to cost reflective tariffs.	http://www.aemc.gov.au/getattachment/2bfce3e3-34c5-abf3-99f83dc0cdec/Tasmanian-Renewable-Energy-Alliance-Inc.aspx					
TPG Almonds	Regional customer	Yes	Operations require use of power during designated peak times at high cost.	It is entirely appropriate that business be offered some of the savings to the grid if large amounts of peak consumption is to be taken offline.	http://www.aemc.gov.au/getattachment/bf26e23f-e0c9-48b9-a071-6f2af3651117/TPG-Almonds.aspx					
Total Environment Centre	Environmental lobbying group	Yes			http://www.aemc.gov.au/getattachment/943a3e77-3de2-4c13-9314-57e39b083fbf/Total-Environment-Centre.aspx					
United Energy	VIC distributor	No	No net benefit to the customer.		http://www.aemc.gov.au/getattachment/49d45278-454e-4626-9fc9-035300168b79/United-Energy.aspx					

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University of Sydney	academic electrical engineering	No	too difficult to calculate value of EG, proposal not technology neutral, claim for 100% of benefit is excessive		http://www.aemc.gov.au/getattachment/38f6f402-c7c9-47f6-b75c-f31631bf51d3/University-of-Sydney.aspx					
Wannon Water	Regional water supply authority and large user	Yes	The water industry is a large user of energy and is working actively to develop novel local energy generation solutions for the benefit of consumers and to demonstrate leadership in adaptation to climate change.	The sector has the potential to develop a significant distributed energy generation capacity, but the ability to pass benefits back to communities is strongly linked to innovation in the regulatory environment and particularly the rules regarding local networks.	http://www.aemc.gov.au/getattachment/c8516661-11bf-4eb7-8b58-2cc2c11c4562/Wannon-Water.aspx					
Warooppe Solar	Regional electrical contractor	Yes	Encourages small embedded generators to remain connected to the network rather than disconnection and stand alone operation.		http://www.aemc.gov.au/getattachment/1d15d526-67cf-428a-b1d9-837957172d74/Warooppe-Solar.aspx					
Willoughby City Council	Suburban local government	Yes	The rule change will enable a constructive transition to future electricity distribution.		http://www.aemc.gov.au/getattachment/fee8cb56-e166-4a51-afa2-4a988f8a6bd7/Willoughby-City-Council.aspx					
Yates Electrical Services	Regional electrical contractor	Yes	LGNC will promote efficient expenditure on the network	LGNC's will empower the individual. Ultimately it is the consumer who we are trying to support through the smart and efficient spending of capital on our electricity networks.	http://www.aemc.gov.au/getattachment/fee8cb56-e166-4a51-afa2-4a988f8a6bd7/Willoughby-City-Council.aspx					
	TOTAL									
	YES		37							
	Yes and No		4							
	No		16							