Sub-threshold Tariff Notice

1 July 2023 to 30 June 2024

28 February 2023



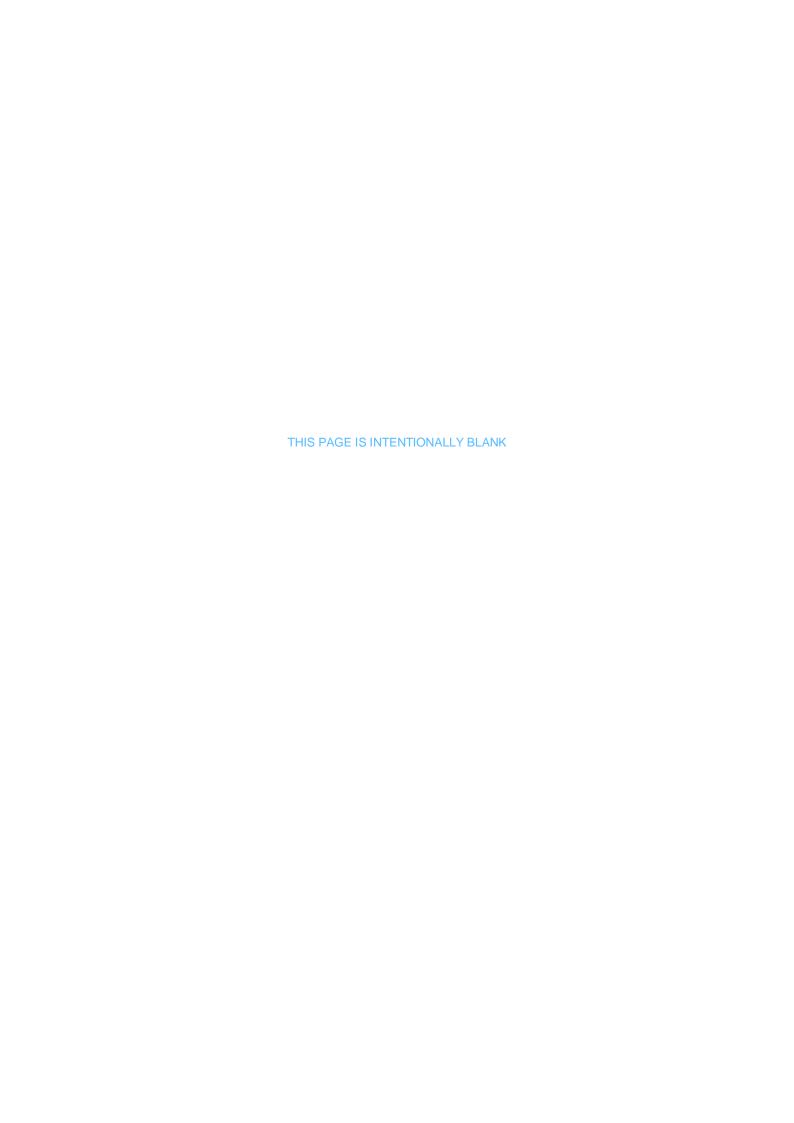


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1. Introduction

In accordance with Rule 6.18.1C of the National Electricity Rules (NER), Endeavour Energy is making this submission to notify the Australian Energy Regulator (AER) of its intention to trial four sub-threshold tariffs from 1 July 2023.

The four proposed tariffs are:

- Off Peak+: A flexible controlled load tariff with specific focus on Hot Water Solar soaking and potential EV application. Off Peak+ is a continuation of the trial tariff first raised in our FY23 subthreshold tariff notice.
- Prosumer: A two-way tariff with export charge and reward with specific focus on PV customers with batterey storage. The Prosumer trial tariff is now offered as a 'secondary' tariff allowing a retailer to pair the trial tariff with any of our existing cost-reflective residential tariffs or the trial Residential Solar Soak tariff. Prosumer is a continuation of the trial tariff first raised in our FY23 sub-threshold tariff notice. The tariff structure has been augmented to match the structure proposed in our TSS Proposal (31 January 2023).
- **Residential Solar Soak**: A seasonal TOU tariff with a solar soak period. Residential Solar Soak is a continuation of the trial tariff first raised in our FY23 sub-threshold tariff notice. The tariff structure has been augmented to match the structure proposed in our TSS Proposal (31 January 2023).
- LV Battery: A two-way tariff for batteries connected to the LV network. LV Battery is a new trial tariff. The tariff structure matches

The overarching purpose of our tariff strategy is to make energy more affordable by providing customers with the information they require to improve network utilisation by making informed and efficient decisions about their use of the network and their investment in new technologies such as solar, batteries and electric vehicles.

The objective of these trials is to investigate new cost-reflective pricing options for customers with a view to making such tariffs more widely available in future regulatory periods. These tariffs have the potential to provide customers with more control over their network electricity bills, improve network utilisation, and enable efficient integration of distributed energy resources (DER) in the distribution network.

The tariff trials provide Endeavour Energy with an opportunity to test new and innovative tariff structures that can meet the future needs of its customers and the distribution network. The emergence of new technologies, such as batteries and Electric Vehicles (EV), and the increasing uptake of solar are changing the way customers interact with the distribution network, and it is important that Endeavour Energy's tariffs keep pace with these changes. The proposed tariff trials set the path for ensuring Endeavour Energy can provide its future customers with more choices and pricing structures that reflect customers' changing technological preferences and energy usage behaviours.

The specific selection of Off Peak+, Prosumer and Solar Soaking tariffs goes directly to the desire to provide customers with tariff choice as these tariff types represent two distinct, and we believe, complementary tariff philosophies. With the Off Peak + trial we are providing a tariff option to customers that may not have the time or inclination to consider and respond to tariff incentives and so will allow them to hand over control of their discretionary load to the network or retailer to manage this load to the benefit of both the individual customer and the broader Grid. For those customers who prefer to maintain control of the timing of their consumption, or who would prefer their own equipment manage their response to tariff incentives, the Prosumer and Solar Soak tariffs use prices and incentives to signal the cost and benefits of consuming and exporting electricity at different times of the day.



2. Summary of notification information

Table 1a: Summary of OP+ and Prosumer notification information

	Off Peak+	Prosumer
Required Information		
Name of trial	Off Peak +	Prosumer
Objectives of trial		
Retailer engagement	Off Peak+ is a continuation of the trial tariff first raised in our FY23 sub-threshold tariff notice. Illustrative tariffs were consulted on prior to our FY23 sub-threshold notice at Endeavour Energy's Retailer Reference Group. One-on-one retailer meetings	Illustrative tariffs have been consulted on as part of Endeavour Energy's TSS submission (31 January 2023)
Consumer engagement	Off Peak+ is a continuation of the trial tariff first raised in our FY23 sub-threshold tariff notice. Illustrative tariffs were consulted on prior to our FY23 sub-threshold notice at Endeavour Energy's Regulatory Reference Group and Joint Regulatory Reference Group Meetings with Essential Energy and Ausgrid.	Illustrative tariffs have been consulted on as part of Endeavour Energy's TSS submission (31 January 2023)
Proposed tariff structure & pricing	Flexible controlled load	Two-way pricing
Forecast revenue (\$ and % AAR)	\$0.018m; 0.00% of AAR	\$0.002m; 0.00% of AAR
Trial start date	1 July 2022	1 July 2023
Duration of trial	2 years	1 year
Potential changes and triggers	Endeavour Energy will monitor uptake relative to NER limitations on sub-threshold tariffs. Tariff will be closed to new entrants when cap is achieved.	Endeavour Energy will monitor uptake relative to NER limitations on sub-threshold tariffs. Tariff will be closed to new entrants when cap is achieved.
Notification date	25 February 2022	28 February 2023

Table 1b: Summary of Residential Solar Soak and LV Battery notification information

	Residential Solar Soak	LV Battery	
Required Information			
Name of trial	Residential Solar Soak	LV Battery	
Objectives of trial			
Retailer engagement	Illustrative tariffs have been consulted on as part of Endeavour Energy's TSS submission (31 January 2023)	Illustrative tariffs have been consulted on as part of Endeavour Energy's TSS submission (31 January 2023)	
Consumer engagement	Illustrative tariffs have been consulted on as part of Endeavour Energy's TSS submission (31 January 2023)	Illustrative tariffs have been consulted on as part of Endeavour Energy's TSS submission (31 January 2023)	
Proposed tariff structure & pricing	Seasonal TOU tariff with a low- priced Solar Soak window	Two-way pricing for grid connected batteries	
Forecast revenue \$0.108m; 0.01% of AAR (\$ and % AAR)		\$0.008m; 0.00% of AAR	
Trial start date	1 July 2023	1 July 2023	
Duration of trial	1 year	1 year	
Potential changes and triggers	Endeavour Energy will monitor uptake relative to NER limitations on sub-threshold tariffs. Tariff will be closed to new entrants when cap is achieved.	Endeavour Energy will monitor uptake relative to NER limitations on sub-threshold tariffs. Tariff will be closed to new entrants when cap is achieved.	
Notification date 28 February 2023		28 February 2023	



3. NER and AER requirements

NER requirements

Section 6.18.1.C(1) of the NER requires a Distribution Network Service Provider (DNSP) to notify the AER, affected retailers, and affected retail customers of a new proposed tariff that is determined otherwise than in accordance with the current Tariff Structure Statement (TSS). In particular, the NER requires that:

- The DNSP's forecast annual revenue for each tariff is no greater than 0.5 per cent of the DNSPs annual revenue requirement (the individual threshold); and
- The DNSP's forecast annual revenue from all tariff trials is no greater than 1 per cent of the DNSP's annual revenue requirement (the cumulative threshold).

Endeavour Energy's proposed tariffs are within both the individual threshold and cumulative threshold, as shown in Table 6.

AER guidance

The AER has published a guidance note on its expectations for tariff trials pursued under the regulatory framework. The AER's guidance note states that distributors should provide clear links between the tariff trial and the distributors' TSS strategy. The AER also requests that distributors report on the results of the tariff trials, and how these learnings have been used by the business.

Endeavour Energy's proposed tariff trials aim to further its strategy of moving towards greater cost reflectivity and providing customers with greater tariff choice and the opportunity to better manage their network bills. The alignment of the subthreshold tariffs to Endeavour Energy's TSS strategy is described in Section 1.

4. Eligibility and duration

This section outlines the proposed duration of the tariff trials and the mechanisms by which customers will be assigned to the tariffs.

Tariff trial period

Endeavour Energy intends to commence the tariff trials on 1 July 2023 to 30 June 2024. This would allow customers on the trial to potentially transition to a new, AER-approved tariff through the TSS process on 1 July 2024.

Off Peak+ eligibility and assignment

The Off Peak+ tariff trial will be provided to customers on an opt-in basis. To be eligible for this pricing trial, a customer must:

Have the metrology and controllable device required to support the trial tariff

Retailers can apply for the trial tariff through our standard tariff change request process. Before approving the request, Endeavour Energy will verify the customer's eligibility for the trial, assess Retailer willingness to share data with Endeavour Energy, and review the impact on revenue limits placed on sub-threshold tariffs under the NER (6.18.1.C).

Endeavour Energy will close the trial tariff to new entrants to ensure the revenue limits placed on sub-threshold tariff under the NER (6.18.1.C) are not breached.

Customers on the Off Peak+ trial may opt-out to an eligible tariff at any time in accordance with Endeavour Energy's current tariff assignment policy. This means that customers can opt -out to our standard Controlled Load tariff options (N50 and N54).

Prosumer eligibility and assignment

The Prosumer tariff trial will be provided to customers on an opt-in basis. To be eligible for this pricing trial, a customer must:

Have the metrology required to support the trial tariff

Retailers can apply for the trial tariff through our standard tariff change request process. Before approving the request, Endeavour Energy will verify the customer's eligibility for the trial, assess Retailer willingness to share data with Endeavour Energy, and review the impact on revenue limits placed on sub-threshold tariffs under the NER (6.18.1.C).

Endeavour Energy will close the trial tariff to new entrants to ensure the revenue limits placed on sub-threshold tariff under the NER (6.18.1.C) are not breached.

Customers on the Prosumer trial may opt-out at any time.

Residential Solar Soak eligibility and assignment

The Residential Solar Soak tariff trial will be provided to customers on an opt-in basis. To be eligible for this pricing trial, a customer must:

- Be a residential customer¹
- Have the metrology required to support the trial tariff

Preference will be given to those customers that have a Solar PV system and/or a home battery system, however a subset of customers without these systems will be admitted to the trial to test the solar soaking function of the trial tariff.

Retailers can apply for the trial tariff through our standard tariff change request process. Before approving the request, Endeavour Energy will verify the customer's eligibility for the trial, assess Retailer willingness to share data with Endeavour Energy, and review the impact on revenue limits placed on sub-threshold tariffs under the NER (6.18.1.C).

Endeavour Energy will close the trial tariff to new entrants to ensure the revenue limits placed on sub-threshold tariff under the NER (6.18.1.C) are not breached.

Customers on the Residential Solar Soak trial may opt-out to an eligible tariff at any time in accordance with Endeavour Energy's current tariff assignment policy. This means that customers can opt out to our residential tariff options (N70, N71, N72 or N73).

LV Battery eligibility and assignment

The LV Battery tariff trial will be provided to low voltage, grid-connected battery customers on an opt-in basis. To be eligible for this pricing trial, a customer must:

- Be a low voltage, grid-connected battery
- Have the metrology required to support the trial tariff

Before approving the request, Endeavour Energy will verify the customer's eligibility for the trial, assess Retailer willingness to share data with Endeavour Energy, and review the impact on revenue limits placed on subthreshold tariffs under the NER (6.18.1.C).

Endeavour Energy will close the trial tariff to new entrants to ensure the revenue limits placed on sub-threshold tariff under the NER (6.18.1.C) are not breached.

Customers on the LV Battery trial may opt-out to an eligible tariff at any time in accordance with Endeavour Energy's current tariff assignment policy. This means that customers can opt out to our small low-voltage tariff options (N90, N91, N92 or N93).



¹ As defined in our Network Price List

5. Engagement

To date, Endeavour Energy has engaged with the following audiences.

Stakeholders

Endeavour Energy has engaged with our Regulatory Reference Group (RRG) and Retailer Reference Group (ReRG) and various other customer and stakeholder forums throughout the development of our 2024-29 TSS proposal.

The customer groups represented at these meetings are outlined in the table below.

Table 2: Stakeholders and customers represented in tariff trial engagement

Representation	Endeavour Energy RRG	Endeavour Energy ReRG
Residential	✓	X
Vulnerable	✓	X
Small Business	\checkmark	X
Large Energy Users	\checkmark	X
Local Council	✓	X
NSW Government	\checkmark	X
Environmental	✓	X
Australian Energy Regulator	✓	X
Retailers	X	✓

Retailers

Feedback received from retailers has been supportive with most recognising the need for a residential tariff that is designed for customers who are highly engaged in their interactions with the energy industry. The conversation with retailers will be ongoing and Endeavour Energy is optimistic that a retailer will pass through the network tariff trial price signals directly to the end customer.

Endeavour Energy was contacted in early February 2023 by a retailer looking to offer a product based on our proposed Prosumer and Residential Solar Soak tariffs and we note that our recent Battery waiver claim will allow Endeavour Energy to trial grid connected batteries in partnership with a retailer.

6. Tariff Structure

The charging parameters for the proposed trial tariffs are set out in the tables below.

Off Peak +

Table 3: Off Peak + trial tariff structure

	Units	Charging Parameter
Anytime Demand	c/kW/day	Charge applied to maximum energy demand for the month.

The Off Peak+ trial builds on a pre-existing innovative technology trial in the suburb of Albion Park on NSW's South Coast. As opposed to traditional controlled load technology, the Off Peak + arrangement allows the network or retailer to flexibly control the customers load through their smart meter in response to real-time network or market constraints without the need to maintain a traditional load control network. The key focus of the broader Off Peak + trial is to use residential electric hot water systems as a solar soak for excess PV export, but we believe there is potential application for other discretionary household loads, such as EV.

Our traditional Controlled Load tariffs are structured as a Fixed charge with Anytime Energy rate. For the purposes of this trial, Endeavour Energy is exploring the use of an Anytime Demand structure. We believe network costs are driven by network demand and therefore, pricing on a demand basis is a more cost-reflective structure in general. More specifically, however, an Anytime Demand structure gives Endeavour Energy the flexibility to use the customer's hot water system to soak excess PV energy without adversely impacting the cost to the customer. Once an appliance on Off Peak + draws demand from the network, the monthly charge for this demand is essentially 'fixed' and scaled to the size of the load being controlled. The hot water system can then be used freely by Endeavour Energy throughout the day to soak excess solar without the customer's bill being adversely impacted by the volume of soaking activities undertaken.

Prosumer

Table 4: Prosumer trial tariff structure

	Units	Charging Parameter		
Import Peak Perio	Import Peak Period (4pm to 8pm) – Business Days			
High-season energy export	c/kWh	Reward applied to energy exported between 16:00 to 20:00 or business days. High-season includes the months November March inclusive.		
Low-season energy export	c/kWh	Reward applied to energy exported between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.		
Export Peak Perio	Export Peak Period (10am to 2pm) – All Days			
Export charge	c/kW/day	Charge applied to maximum energy export between 10:00 to 14:00 on all days. Applies to maximum energy export above 2kW.		

The Prosumer tariff is a two-way tariff designed to improve network utilisation by better signalling the network cost and benefits of solar PV and battery installations:

- an export charge for PV export over 2kW between 10am and 2pm to signal the forward-looking cost of PV export on the network and to incentivise PV customers to either, increase their discretionary load at times their PV output is high, or shift their export to a time that better manages peak network demand.
- an export incentive for export between 4pm and 8pm business days, the time at which the export can be used to manage peak network demand.

The Prosumer trial tariff structure is consistent with the Prosumer tariff proposed in Endeavour Energy's TSS submission (31 January 2023).



Residential Solar Soak

Table 5: Residential Solar Soak trial tariff structure

	Units	Charging Parameter
Fixed	c/day	Daily access charge
Off-peak energy	c/kWh	Charge applied to energy consumed at all other times
Import Peak Perio	od (4pm to 8pi	m) – Business Days
High-season peak energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
Low-season peak energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
Export Peak Period (10am to 2pm) – All Days		om) – All Days
Solar soak energy	c/kWh	Charge applied to energy consumed between 10:00 to 14:00 on all days.

The Residential Solar Soak is a seasonal TOU tariff with a low-priced Solar Soak period between 10am and 2pm designed to encourage customers to increase their discretionary consumption at this time to soak additional PV export.

The Residential Solar Soak trial tariff structure is consistent with the Residential Seasonal TOU tariff proposed in Endeavour Energy's TSS submission (31 January 2023).

LV Battery

Table 6: LV Battery trial tariff structure

	Units	Charging Parameter		
Fixed	c/day	Daily access charge		
Off-peak energy	c/kWh	Charge applied to energy consumed at all other times		
Off-peak energy export	c/kWh	Reward applied to energy exported at all other times		
Import Peak Perio	od (4pm to 8pr	m) – Business Days		
High-season peak energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.		
Low-season peak energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.		
High-season peak energy export	c/kWh	Reward applied to energy exported between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.		
Low-season peak energy export	c/kWh	Reward applied to energy exported between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.		
Export Peak Perio	od (10am to 2p	pm) – All Days		
Solar soak energy	c/kWh	Charge applied to energy consumed between 10:00 to 14:00 on all days.		
Export charge	c/kW/day	Charge applied to maximum energy export between 10:00 to 14:00 on all days. Applies to maximum energy export above 2kW.		

The LV Battery trial tariff is a combination of seasonal TOU tariff with a low-priced Solar Soak period between 10am and 2pm and a two-way tariff with export rewards and charges.

The LV Battery trial tariff structure is consistent with the LV Battery trial tariff proposed in Endeavour Energy's TSS submission (31 January 2023).

7. Indicative pricing

At the time of this tariff notification, Endeavour Energy has developed indicative price for its proposed trial tariffs. Endeavour Energy will submit the expected revenue from trial tariffs to the AER as part of Endeavour Energy's 2023/24 Pricing Proposal, due in March 2023. In doing so, Endeavour Energy will ensure the proposed prices continue to adhere to the subthreshold revenue requirements. The tables below set out Endeavour Energy's indicative 2023/24 prices for the tariff trials.



Off Peak+

Table 7: Indicative Off Peak + prices

	Units	Indicative DUOS Price	Indicative NUOS Price
Anytime Demand	c/kW/day	3.600	5.160

Prosumer

Table 8: Indicative Prosumer prices

	Units	Indicative DUOS Price	Indicative NUOS Price
Import Peak Period (4pm to 8pm) – Busin	ess Days		
HS Export Reward	c/kWh	-11.036	-11.036
LS Export Reward	c/kWh	-3.337	-3.337
Export Peak Period (10am to 2pm) - All [Days		
Export Charge (Applicable to export >2kW)	c/kW/day	3.600	3.600

Residential Solar Soak

Table 9: Indicative Residential Solar Soak prices

	Units	Indicative DUOS Price	Indicative NUOS Price
Fixed	\$pa	167.59	167.59
All Other Energy Import	c/kWh	5.947	8.228
Import Peak Period (4pm to 8pm) – Busin			
HS Import	c/kWh	20.170	22.450
LS Import	c/kWh	10.247	12.528
Export Peak Period (10am to 2pm) – All Days			
Solar Soak Energy Import	c/kWh	0.000	2.281

LV Battery

Table 10: Indicative Residential Solar Soak prices

	Units	Indicative DUOS Price	Indicative NUOS Price
Fixed	\$pa	408.436	408.436
All Other Energy Import	c/kWh	0.996	1.460
Import Peak Period (4pm to 8pm) – Busin	ess Days		
HS Import	c/kWh	15.219	15.683

LS Import	c/kWh	5.296	5.760
HS Export Reward	c/kWh	-11.036	-11.036
LS Export Reward	c/kWh	-3.337	-3.337
Export Peak Period (10am to 2pm) – All [
Solar Soak Energy Import	c/kWh	0.000	0.000
Export Charge (Applicable to export >2kW)	c/kW/day	3.600	3.600

8. Forecast revenues and thresholds

Section 6.18.1C(a) requires that subthreshold tariffs must satisfy both an individual and cumulative revenue threshold. In particular, the NER requires that Endeavour Energy's:

- forecast annual revenue for each tariff is no greater than 0.5 per cent of the annual revenue requirement (the individual threshold); and
- forecast annual revenue from all tariff trials is no greater than 1 per cent of the annual revenue requirement (the cumulative threshold).

As shown in Table 11 and Table 12, Endeavour Energy's proposed sub-threshold tariffs are forecast to fall significantly below both the individual and cumulative thresholds for 2023/24.

Endeavour Energy will continue to monitor customer numbers and volumes on the trial tariffs. In the unlikely event that that the trials approach the revenue thresholds, Endeavour Energy will close the trial tariff to new entrants.

Endeavour Energy intends to demonstrate ongoing compliance with the revenue thresholds in its annual pricing proposal to the AER.

Table 11: Compliance with revenue thresholds for subthreshold tariffs

Annual Smoothed Revenue Requirement (AAR)	Rules threshold (\$'000)	Expected Trial DUOS (Absolute Value) (\$'000)	Expected Trial DUOS (% of ARR)
Indicative 2022/23 AAR (DUOS)	889,744		
1% of AAR – Aggregate of all Trials	8,897	136	0.02%
0.5% of AAR – Off Peak+ Trial	4,449	18	0.00%
0.5% of AAR – Prosumer Trial	4,449	2	0.00%
0.5% of AAR – Residential Solar Soak Trial	4,449	108	0.01%
0.5% of AAR – LV Battery Trial	4,449	8	0.00%



Table 12: Detailed revenue forecast for calculation of subthreshold tariff compliance

	Forecast Quantity	Indicative DUOS Price	Forecast DUOS Revenue (\$'000)			
Off Peak+						
Anytime Demand	16,845	3.60	18			
Tariff Total			18			
Prosumer						
Import Peak Period (4pm to 8pm) – Business Days						
HS Export Reward	15,078	-11.04	-2			
LS Export Reward	52,727	-3.34	-2			
Export Peak Period (10am to 2pm) – All Days						
Export Charge (Applicable to export >2kW)	1,486	3.60	2			
Tariff Total			-2			
Residential Solar Soak						
Fixed	200	167.59	34			
All Other Energy Import	789,737	5.95	47			
Import Peak Period (4pm to 8pm) – Business Days						
HS Import	76,211	20.17	15			
LS Import	121,429	10.25	12			
Export Peak Period (10am to 2pm) – All Days						
Solar Soak Energy Import	141,637	0.00	0			
Tariff Total			108			
LV Battery						
Fixed	5	408.44	2			
All Other Energy Import	0	1.00	0			
Import Peak Period (4pm to 8pm) – Business Days						
HS Import	0	15.22	0			
LS Import	0	5.30	0			
HS Export Reward	62,800	-11.04	-7			
LS Export Reward	89,001	-3.34	-3			
Export Peak Period (10am to 2pm) – All Days						
Solar Soak Energy Import	250,025	0.00	0			
Export Charge (Applicable to export >2kW)	0	3.60	0			
Tariff Total			-8			
Sub-Threshold Tariff Total (Absolute Value)			136			

9. Alignment to TSS strategy

The overarching purpose of our tariff strategy is to make energy more affordable by providing customers with the information they require to improve network utilisation by making informed and efficient decisions about their use of the network and their investment in new technologies such as solar, batteries and electric vehicles.

The objective of these trials is to investigate new cost-reflective pricing options for customers with a view to making such tariffs more widely available in future regulatory periods. These tariffs have the potential to provide customers with more control over their network electricity bills, improve network utilisation, and enable efficient integration of distributed energy resources (DER) in the distribution network.

The tariff trials provide Endeavour Energy with an opportunity to test new and innovative tariff structures that can meet the future needs of its customers and the distribution network. The emergence of new technologies, such as batteries and Electric Vehicles (EV), and the increasing uptake of solar are changing the way customers interact with the distribution network, and it is important that Endeavour Energy's tariffs keep pace with these changes. The proposed tariff trials set the path for ensuring Endeavour Energy can provide its future customers with more choices and pricing structures that reflect customers' changing technological preferences and energy usage behaviours.

The specific selection of Off Peak+, Prosumer and Residential Solar Soak tariffs goes directly to the desire to provide customers with tariff choice as these tariff types represent distinct, and we believe, complementary tariff philosophies. With the Off Peak + trial we are providing a tariff option to customers that may not have the time or inclination to consider and respond to tariff incentives and so will allow them to hand over control of their discretionary load to the network or retailer to manage this load to the benefit of both the individual customer and the broader Grid. For those customers who prefer to maintain control of the timing of their consumption, or who would prefer their own equipment manage their response to tariff incentives, the Prosumer and Solar Soak tariffs use prices and incentives to signal the cost and benefits of consuming and exporting electricity at different times of the day.

