

FINAL DECISION

Australian Gas Networks (South Australia)

Gas Distribution Determination

2026 to 2031

Reference service, tariff variation mechanism and
tariff structure

November 2024

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Executive summary

The Australian Energy Regulator (AER) works to make all Australian energy consumers better off, now and in the future. We regulate energy networks in all jurisdictions except Western Australia. We set the amount of revenue that network businesses can recover from customers for using these networks.

The National Gas Law and Rules (NGL and NGR) provide the regulatory framework governing gas transmission and distribution networks. Our work under this framework is guided by the National Gas Objective (NGO):

The objective of this Law is to promote efficient investment in, and efficient operation and use of, natural gas services for the long term interests of consumers of natural gas with respect to—

- (a) price, quality, safety, reliability and security of supply of natural gas; and
- (b) the achievement of targets set by a participating jurisdiction—
 - (i) for reducing Australia's greenhouse gas emissions; or
 - (ii) that are likely to contribute to reducing Australia's greenhouse gas emissions.

Australian Gas Networks (South Australia) (AGN SA) provides reticulated gas distribution services in South Australia including Adelaide.

On 1 July 2024 AGN SA submitted to the AER a reference service proposal for its gas distribution network. We have assessed the proposal against the requirements set out in the NGR.

Our final decision is to approve AGN SA's reference service proposal. We consider the proposal is consistent with the regulatory requirements and we note support provided by the one submission we received.

We published AGN SA's proposal on the AER website and called for submissions. We received one submission from the Essential Services Commission of South Australia (ESCOSA) which was supportive of AGN SA's reference service proposal.

Under the new non-statutory requirements implemented by the AER in 2023, AGN SA also submitted with its regulatory proposal preliminary positions on its tariff variation mechanism and tariff structure for gas transportation (haulage) services for the 2026–31 access arrangement period.

AGN SA proposed not to make changes to its existing tariff variation mechanism (weighted average price cap) or tariff structure (declining block tariffs) for gas transportation (haulage) services.

On its tariff variation mechanism, we consider AGN SA should develop, in consultation with stakeholders, a hybrid tariff variation mechanism for haulage services for submission to the AER with its access arrangement revisions proposal.

We consider retaining AGN SA's existing weighted average price cap is not appropriate because of the incentive it provides for AGN SA to grow the volume of gas carried by its network. The NGO now incorporates emissions reduction objectives – incentivising gas transportation/consumption is inconsistent with achievement of emissions reduction targets at state and national levels. On this basis, either revenue cap regulation (does not incentivise growing volumes) or hybrid mechanisms (subject to design, provides a weaker incentive to grow volumes) incorporating elements of both price cap and revenue cap regulation are more appropriate.

While we did not receive submissions relevant to this issue in response to AGN SA's reference service proposal, we received many submissions in the context of our 2023 gas distribution network tariffs review.¹ Stakeholders generally do not support application of revenue cap regulation to haulage services and prefer either to retain existing weighted average price caps or to introduce hybrid mechanisms incorporating elements of both weighted average price cap and revenue cap regulation.

In our view a hybrid tariff variation mechanism can best balance the positive and negative elements of price cap and revenue cap regulation. While weakening the incentive for gas networks to grow volumes, they can mitigate year-on-year tariff volatility. While assigning some volume risk to customers, they continue to assign some volume risk to networks. An example of a hybrid tariff variation mechanism has been proposed to the AER by JGN for its NSW gas network, following consultation with stakeholders. JGN's proposal represents one example of a hybrid mechanism that would be capable of acceptance in AGN SA's context.

On its tariff structure for haulage services, we consider AGN SA should develop and submit for AER consideration one or more implementation pathways to incrementally flatten its declining block tariff structure, over one or more access arrangement periods. We consider AGN SA's declining block tariff structure is inconsistent with the NGO. In developing its potential implementation pathway(s), AGN SA should consider the pace of change, bill impacts for high consumption customers and the need for adequate transition periods.

By developing tariff structure reform options in collaboration with stakeholders, we consider AGN SA can better reflect the emissions reduction aspect of the updated NGO. In developing its potential tariff structure reform(s), AGN SA should consider the pace of change, bill impacts on high consumption customers and the need for adequate transition periods.

While we expect AGN SA to respond to our tariff related considerations as set out in this paper, our preliminary views expressed here do not constrain our decisions on these issues in the context of AGN SA's upcoming 2026–31 access arrangement revisions proposal. We may form different views in response to further information or stakeholder views being provided.

¹ AER, *Final decision – Review of gas distribution network reference tariff variation mechanism and declining block tariffs*, October 2023.

1 Background

This section discusses the NGR reference service requirements, and the new non-statutory issues addressed by AGN SA's reference service proposal: reference tariff variation mechanism and declining block tariffs for haulage services.

1.1 AGN SA

AGN SA's gas distribution network serves around 450,000 customers in Adelaide and South Australia's regional centres in the upper north, Barossa, Riverland and southeast. The network comprises around 8,100 km of distribution pipeline.

1.2 Reference services

In preparing its reference service proposal and in undertaking our assessment, the NGR require AGN SA and ourselves to have regard to the NGR reference service factors:

- the actual and likely demand for the pipeline's services and the number of prospective users
- the extent to which the pipeline service is substitutable with another service
- the feasibility of allocating costs to the pipeline service
- the usefulness of specifying the pipeline service as a reference service in supporting negotiations and dispute resolution
- likely regulatory costs for all parties in specifying the pipeline service as a reference service.

Services we determine meet the reference service factors will be determined to be reference services. Services we determine do not meet the reference service factors will be treated as non-reference services.

Determining a service to be a reference service, as compared to it being a non-reference service, makes a significant difference to how the service is regulated.

Reference services are subject to AER price regulation. That is, we set maximum prices, or price caps, which gas networks may charge network users for reference services. Gas networks may choose to charge network users less than the price caps we determine but they may not charge more.

Services we determine to be non-reference services are not subject to price regulation. This means gas networks set their own charges for non-reference services.

1.3 Reference service proposal process

Gas network service providers are required to submit a separate reference service proposal to the AER for assessment twelve (12) months in advance of the submission date for their access arrangement revisions proposal.

The NGR requires us to complete our assessment of a reference service proposal no later than six (6) months in advance of the due date for submission of the relevant access arrangement revisions proposal.

AGN SA's access arrangement revisions submission date is 30 June 2025.² This means AGN SA was required to submit its reference service proposal to the AER by no later than 30 June 2024, which it did. We are required to conclude our assessment and release our decision no later than 31 December 2024.

An access arrangement must be consistent with our reference service proposal decision unless there has been a material change in circumstances.³

1.4 Tariff (non-statutory) considerations

In early 2023 we initiated a review of how we regulate the haulage service provided by gas distribution network service providers (distributors). This review considered whether to continue to approve these elements of existing gas distribution access arrangements or whether changes were required:⁴

- weighted average price caps (reference tariff variation mechanism) which regulate the revenues distributors receive for providing reference haulage services
- declining block tariffs which set the parameters for how retailers are billed for reference haulage services provided to their customers.

In October 2023, our final decision of the review indicated we would not make sector-wide changes to gas distribution pipeline tariff variation mechanisms or tariff structures.⁵ Instead, we chose to consider these issues on a case-by-case basis in the context of individual access arrangement reviews by building consideration of these matters into the existing reference service proposal assessment. This approach allows us to signal our views on the tariff variation mechanism and tariff structure issues in time for incorporation in the distributors' access arrangement revision proposals.

To be clear, only the reference service elements of this reference service proposal decision relate to a statutory decision. The tariff related aspects of this decision are non-statutory. That is, the NGR do not specify that the AER has a role in assessing tariff related issues at

² Access arrangement revisions for the 2025/26 to 2030/31 access arrangement period.

³ NGR cll.48(1)(b)(c) and (c1).

⁴ AER, *Review of gas distribution network reference tariff variation mechanism and declining block tariffs*, 5 May 2023.

⁵ AER, *Review of gas distribution network reference tariff variation mechanism and declining block tariffs*, October 2023.

the reference service proposal stage. Rather, we proposed to undertake this assessment and the regulated gas distributors agreed.

We consider that a public process of proposal and AER consideration of these tariff related issues, at this early stage of a gas distribution access arrangement review, will benefit stakeholders and networks.

2 AGN SA’s reference service proposal

This section outlines AGN SA’s reference service proposal including the stakeholder consultation it undertook in developing its proposal. It then describes our stakeholder consultation undertaken in assessing AGN SA’s proposal, and our decision on AGN SA’s reference service proposal.

2.1 AGN SA’s reference service proposal

AGN SA proposed to maintain the same suite of reference services from its current access arrangement period, except for the inclusion of the abolishment service (small scale residential) as a reference service. AGN SA also proposed minor changes to non-reference services.

Table 1 shows the reference and non-reference services including the changes AGN SA has proposed for the 2026–31 access arrangement period.

Table 1 AGN SA’s proposed reference and non-reference services

Reference services	Non reference services
<p>Two types of reference services:</p> <p>Haulage reference services:</p> <ul style="list-style-type: none"> • Domestic Haulage Service • Demand Haulage Service • Commercial Haulage Service <p>Ancillary non-reference services:</p> <ul style="list-style-type: none"> • Special Meter Reading • Disconnection • Reconnection • Meter Gas and Installation Test • Meter Removal • Meter Reinstallation • Service Abolishment 	<p>Ancillary non-reference services:</p> <ul style="list-style-type: none"> • Meter Alter Position / Removal • Out of Hours Special Meter Reading • Same Day Premium Service • Relocate/Remove Service Pipe • Cut-off Service in Street for Debt • Reconnect Service in Street After Cut-Off • Upgrade Service Request • Downgrade Meter Size • Pressure Change • Other Negotiated Service

Reference services

AGN SA submitted that, while it does not expect the South Australian Government to introduce a policy to ban new gas connections or otherwise constrain availability of gas via its gas distribution network, stakeholders indicated it should include the abolishment service as a reference service for transparency and to reflect potential changes in market conditions.⁶

AGN SA also submitted that including an abolishment service for small customers would be consistent with Victoria and provide flexibility on the treatment of any proposed charge for the service in the 2026–31 access arrangement proposal.

AGN SA views the abolishment service as meeting the reference service factors under NGR 47(A)15 in that there is currently moderate demand for the service and it is not substitutable with any other service. It proposed that it can also allocate costs for this service for residential properties and other small scale abolishments because they are relatively standard in scope.

AGN SA intend to undertake further engagement on its 2026–31 access arrangement proposal on the approach to cost recovery.

Non-reference services

AGN SA proposed to remove the non-reference services ‘cut-off service in street for debt’ and ‘reconnect service in street after cut-off’, as a consequence of its proposal to re-classify abolishment as a reference service. AGN SA also proposed to remove the ‘upgrade service request’.

AGN SA further proposed to separately identify two non-reference services (‘downgrade meter size’ and ‘pressure change’) which were previously categorised as ‘other’ non-reference services.

2.2 AGN SA’s stakeholder consultation

AGN SA submitted that it engaged with a diverse cross-section of the community:

- residential and business gas customers,
- customer and stakeholder representative groups for residential customers and older Australians, multicultural communities, and small and large businesses, reflecting the diversity of our customer base, and
- the Retailer Reference Group (RRG), comprising representatives from gas retailers who operate in national markets including South Australia.

⁶ AGN SA, *Reference Service Proposal*, June 2024, pp.13-14.

AGN SA informed us of the key engagement activities that were conducted on the draft reference service proposal:

- Direct feedback sessions with retailers and other stakeholders (27 participants)–
 - a. 16 May 2024: briefing session with key stakeholders provided an overview of the draft reference service proposal
 - b. 31 May 2024: separate sessions with the stakeholders and the RRG to obtain direct feedback.
- Customer workshops (47 participants)–
 - a. hosted five (5) online sessions
 - b. involved customers from across AGN SA’s network, with representatives from metropolitan Adelaide and regional areas (Port Pirie/Whyalla, the Barossa, Murray Bridge and Mount Gambier)
 - c. tested key questions with customers
 - d. sessions were facilitated by KPMG, who generated a summary report of the feedback from customers.
- Gas matters website–
 - a. published the draft reference service proposal slides from the engagement sessions
 - b. customers and stakeholders could interact with AGN SA via a two-way digital platform.

AGN SA submitted that its engagement activities canvassed all services it offers as well as those which should be considered as reference services. AGN SA also focused on its proposed tariff approach, including the form of regulation (tariff variation mechanism) and tariff pricing structure.

AGN SA circulated its draft reference service proposal to its stakeholders for feedback on 15 May 2024. In this draft proposal, AGN SA provided that its current list of services will be maintained, and that it will continue with the current tariff and revenue control approaches for the 2026–31 access arrangement period. AGN SA received five written submissions on its draft reference service proposal.

AGN SA informed us that the majority of stakeholders and customers indicated they are generally supportive of a continuation of the current reference services in the 2026–31 access arrangement period. However, some stakeholders identified the importance of the abolishment service being classified as a separate service in the interests of transparency and to cater for any possible future increase in demand.

New connection services were identified in a submission provided by ESCOA as being a service that should be made more transparent to customers and its cost recovery explained. AGN SA disagreed because it has never charged for new connections in South Australia, such a requirement has never existed in the state and it is not aware of any concerns from

customers about its cost recovery. Cost recovery is currently made (and has always been) through haulage tariffs.⁷

AGN SA presented a summary in its proposal of the stakeholder and customer feedback on its proposed approaches, the issues raised and AGN SA's responses.

2.3 AER stakeholder consultation

We published AGN SA's reference service proposal on the AER website on 2 July 2024. We called for written submissions by no later than 16 August 2024.

In response, we received one submission from ESCOSA supporting AGN SA's reference service proposal including the classification of abolishment as a reference service. ESCOSA also raised a concern over the consideration of future customer number scenarios and engagement on alternative tariff structures. These will be discussed in the tariff structure section below.

2.4 AER assessment of AGN SA's reference service proposal

Our final decision is to approve AGN SA's reference service proposal which includes the abolishment service for small customers as a reference service. We consider the proposal is consistent with NGR cl. 47A.

To assess AGN SA's reference service proposal we considered the extent to which it conforms to each regulatory requirement set out in the NGR cl 47A. Our detailed assessment is set out in Table 2.

Table 2 Summary of NGR cl. 47A reference service requirements

NGR cl. 47A requirement	Compliance assessment
(1) A service provider in respect of a full regulation pipeline must, whenever required to do so under subrule (3), submit to the AER a reference service proposal in respect of a forthcoming full access arrangement proposal that:	
(a) identifies the pipeline and includes a reference to a website at which a description of the pipeline can be inspected;	Compliant. See section 1.2 and 1.3 of AGN SA's reference service proposal.
(b) sets out a list of all the pipeline services that the service provider can reasonably	Compliant. See Table 3 of AGN SA's reference service proposal.

⁷ AGN SA, *Reference Service Proposal*, June 2024, p.8.

provide on the pipeline and a description of those pipeline services having regard to the characteristics in subrule (2);

(c) from the list referred to in subrule (1)(b), identifies at least one of those pipeline services that the service provider proposes to specify as reference services having regard to the reference service factors including any supporting information required by the AER; and

Compliant. See Table 3 of AGN SA's reference service proposal.

(d) if the service provider has engaged with pipeline users and end users in developing its reference service proposal, describes any feedback received from those users about which pipeline services should be specified as reference services.

Compliant. See section 2.2 of AGN SA's reference service proposal.

(2) A pipeline service is to be treated as distinct from another pipeline service having regard to the characteristics of different pipeline services, including:

AGN SA's reference service proposal appropriately defines pipeline services in regard to their characteristics, priority and receipt points.

(a) the service type (for example, forward haul, backhaul, connection, park and loan);

(b) the priority of the service relative to other pipeline services of the same type; and

(c) the receipt and delivery points.

(14) In deciding whether or not a pipeline service should be specified as a reference service, the AER must have regard to the reference service factors.

We have had regard to the reference service factors in assessing AGN SA's reference service proposal.

(15) The reference service factors are:

(a) actual and forecast demand for the pipeline service and the number of prospective users of the service;

AGN SA's reference service proposal is premised on there being ongoing high demand for the haulage reference services and its proposed ancillary reference services.

In respect of AGN SA's proposed non-reference services, it submitted these are either not frequently required, have never been used or are subject to unpredictable demand.

We accept AGN SA's proposition that demand for its proposed non-reference services is

	difficult to forecast and/or likely to be low or nil.
(b) the extent to which the pipeline service is substitutable with another pipeline service to be specified as a reference service;	The haulage reference services and ancillary services are not substitutable with other services.
(c) the feasibility of allocating costs to the pipeline service;	Costs may be allocated to the proposed reference services. We accept that allocating costs to AGN SA's proposed non-reference services may be difficult due to uncertain demand and/or variable costs.
(d) the usefulness of specifying the pipeline service as a reference service in supporting access negotiations and dispute resolution for other pipeline services, such that:	
(i) reference services serve as a point of reference from which pipeline services that are not reference services can be assessed by a user or prospective user for the purpose of negotiating access to those other pipeline services;	The reference services will be a point of reference for negotiations.
(ii) a reference tariff serves as a benchmark for the price of pipeline services that are not reference services; and	As above.
(iii) reference service terms and conditions serve as a benchmark for the terms and conditions of pipeline services that are not reference services;	As above.
(e) the likely regulatory cost for all parties (including the AER, users, prospective users and the service provider) in specifying the pipeline service as a reference service.	By specifying haulage services and commonly used ancillary services as reference services the current arrangements will be continued. As a result, regulatory costs for all parties will be minimised.

3 AGN SA’s tariff variation mechanism

This section outlines AGN SA’s tariff variation mechanism proposal including the stakeholder consultation it undertook in developing its proposal. It then describes our stakeholder consultation undertaken in assessing AGN SA’s proposal, and our decision on AGN SA’s proposal.

3.1 AGN SA’s tariff variation mechanism proposal

AGN SA proposed to retain its weighted average price cap tariff variation mechanism for haulage services for the 2026–31 access arrangement period. AGN SA submitted that this would mitigate price volatility that could arise under revenue cap regulation and would avoid shifting volume risk onto its customers.⁸

3.2 AGN SA’s stakeholder consultation

AGN SA submitted that stakeholders supported continuation of the weighted average price cap for the 2026–31 access arrangement period. AGN SA provided that 68% of customers indicated that they preferred the price cap approach over a revenue cap or hybrid option and only 5% preferred a revenue cap. The remaining 21% of customers surveyed indicated a preference for a hybrid option.⁹

AGN SA submitted that stakeholder and customer preference to retain a price cap was due to identifying price stability as highly important. AGN SA submitted that customers perceived a revenue cap as being potentially inconsistent with the level of price stability and predictability that they preferred.

3.3 AER stakeholder consultation

We did not receive feedback on AGN SA’s tariff variation mechanism preliminary proposal.

3.4 AER assessment of AGN SA’s tariff variation mechanism proposal

We consider AGN SA should develop, in consultation with stakeholders, a hybrid tariff variation mechanism for haulage services for submission to the AER with its access arrangement revisions proposal.

A hybrid mechanism incorporating elements of price cap and revenue cap regulation will weaken the existing incentive for AGN SA to increase the volume of gas transported through

⁸ AGN SA, *Reference Service Proposal*, June 2024, p. 21.

⁹ AGN SA, *Reference Service Proposal*, June 2024, p. 9.

its network – a flaw of weighted average price caps. It will also mitigate year-on-year tariff volatility – a flaw of revenue caps. The emphasis on accurate volume forecasting to underpin tariff setting will also be reduced under a hybrid mechanism – volume forecasting error has been a feature of weighted average price cap regulation in recent years. The allocation of volume risk across both AGN SA and its customers is another appealing feature of potential hybrid mechanisms. We consider retaining some volume risk for AGN SA is appropriate.

The updated NGO, incorporating emissions reduction objectives, conflicts with the underlying principle of weighted average price cap regulation, which incentivises gas networks to increase volumes to receive more revenue. Under both revenue cap regulation and a hybrid cap and collar mechanism, AGN SA would have either no incentive, or less incentive, to increase gas volumes because any revenue over-recoveries would be avoided altogether or shared with customers.

4 AGN SA’s gas transportation tariff structure

This section outlines AGN SA's haulage tariff structure proposal including the stakeholder consultation it undertook in developing its proposal. It then describes our stakeholder consultation undertaken in assessing AGN SA’s proposal, and our decision on AGN SA’s proposal.

4.1 AGN SA’s gas transportation tariff structure proposal

AGN SA proposed to retain its existing declining block tariff structure, without change, for the 2026–31 access arrangement period. Table 3 sets out AGN SA’s declining block tariff structure for two tariff classes, as an indication of its approach to all gas transportation tariff classes.¹⁰

Table 3 AGN SA’s declining block tariff structure

Tariff R excl. Tanunda (Domestic Haulage Service - Charges per Network Day excl. GST)	
Fixed Charge	0.3193
GJ 0 - 0.0274	37.1077
GJ 0.0274 - 0.0493	10.8035
GJ > 0.0493	3.6573
Tariff C excl. Tanunda (Commercial Haulage Service – Charges per Network Day exc. GST)	
Fixed Charge	0.6729
First 0.9863 GJ	18.3662
Next 4.2740 GJ	5.9784
Next 11.1780 GJ	2.5826
Additional GJ	2.1366

Source: AGN SA, Reference Service Proposal, June 2024

¹⁰ AGN SA, *Reference Service Proposal*, June 2024, p.23.

4.2 AGN SA's stakeholder consultation

AGN SA submitted that the majority (57%) of its stakeholders and customers, and four of the five submissions it received, preferred the continuation of its existing declining block tariff structure. AGN SA submitted that this was because customers perceived it as the most efficient pricing structure to recover fixed costs on its network and that tariffs would be too high under an alternative structure such as a flat structure.¹¹ However, 26% of AGN SA's customers indicated a preference for further assessment of flat tariffs, mainly due to the potential positive impact on their bills.

AGN SA noted that a submission by South Australian Council of Social Service (SACOSS) did not support the declining block tariff structure. Instead, it indicated a preference for flat tariffs so long as negative customer impacts were offset by support measures.

ESCOSA submitted that it would like to see more granular information about the distribution of AGN SA's customer base across usage levels and the associated bill impact under various tariff structure options.

AGN SA noted that there was also a preference for a flat structure with support measures to offset any negative impacts and for only residential customers to be charged flat tariffs. This is because commercial customers could be particularly adversely affected, which would lead to consumers being impacted (indirectly) by the inflationary impact.

4.3 AER stakeholder consultation

The Essential Services Commission of South Australia (ESCOSA) submitted its preference for more customer engagement and data modelling on tariff design for the 2026–31 access arrangement period.¹² ESCOSA expressed concern that AGN SA did not present future customer number scenarios as part of its engagement on its draft reference service proposal. ESCOSA submitted that customer numbers, and the potential for customer numbers to change, are important considerations in tariff design.

ESCOSA noted that there are no policies in South Australia that encourage or incentivise customers to discontinue using gas, although there is some indication that consumer preferences for gas is shifting.

ESCOSA considers that there is benefit in considering future customer number scenarios in developing tariff structures because:

- network tariffs may need to rise if costs are shared across fewer customers.
- more customers would most likely leave the network if tariffs rise, causing further tariff increases

¹¹ AGN SA, *Reference Service Proposal*, June 2024, p. 10.

¹² ESCOSA, *Submission on Australian Gas Networks South Australia 2026–2031 Reference service proposal*, August 2024, p.2.

- customers least able to afford tariff increases, or to switch to electric appliances, would most likely be the customers who remain on the network
- tariff structures with high fixed costs (and to an extent, declining block tariffs) may pose a barrier to partial or progressive electrification, and so limit consumer resilience to future change.

ESCOSA suggested it would be beneficial for AGN SA to provide alternative tariff structures to customers and stakeholders and include more information such as number of customers that would be better or worse off under each option. This would help customers understand how their own bills would be affected and provide a basis for informed feedback. It would also help with assessing the estimated emission impacts under each option.

4.4 AER assessment of AGN SA's tariff structure proposal

We consider AGN SA should develop and submit for AER consideration one or more implementation pathways to incrementally flatten its declining block tariff structure, over one or more access arrangement periods. Declining block tariffs do not align with the NGO which now includes an emissions reduction element. In developing its potential implementation pathway(s), AGN SA should consider the pace of change, bill impacts on high consumption customers and the need for adequate transition periods.

We recognise that high consumption customers negatively impacted by changes to AGN SA's existing tariff structure could include households experiencing disadvantage in addition to other households and commercial/industrial customers.

However, we consider there may be reform options available to moderate the declining block structure without imposing material bill impacts on large consumption customers. As an example, the gas distributor in NSW – JGN, proposed incremental changes to its gas transportation tariff structure with the effect of moderating the declining block structure. We consider similar changes should be available to AGN SA.

We intend to explore such tariff redesign opportunities in the context of AGN SA's 2026–31 access arrangement revisions proposal. We encourage AGN SA to consult its customers and stakeholders on tariff reform options prior to submission to the AER.

Glossary

Term	Definition
AA	access arrangement
AEMC	Australian Energy Market Commission
AER	Australian Energy Regulator
AGN SA	Australian Gas Networks (South Australia)
Cl.	clause
ESCOSA	Essential Services Commission of South Australia
NGO	National Gas Objective
NGR	National Gas Rules
