

EQL RESET REFERENCE GROUP

Submission on Energy Queensland's Proposed
Amendments to the Revised Tariff Structure Statement
for 2025–30

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ENERGY QUEENSLAND
RESET REFERENCE GROUP

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The Energy Queensland Reset Reference Group (RRG) wishes to make the following comments on the matters raised in Energy Queensland's submission to the AER on 6th February 2025 regarding proposed amendments to the revised Tariff Structure Statement for 2025-30.

1. Transitional arrangements for customers subject to a retailer initiated basic meter upgrade

The RRG supports Energy Queensland's proposal to amend assignment arrangements so that customers would be reassigned to the new smart meter tariff 12 months after the date of the basic meter upgrade, rather than 12 months following the end of the financial year in which the meter change is made. We believe that this change will enable a smoother and more efficient workflow for both Energy Queensland and retailer staff charged with carrying out the tariff reassignments, by avoiding the need to complete a large number of tariff reassignments on the same day. In addition, we understand that the original intent of allowing additional time between basic smart meter installation and tariff reassignment was to provide customers with more time to understand and adjust to the complexities of the new cost reflective tariffs. Subsequent to development of the Revised TSS, the AEMC's final decision on '**Accelerating smart meter deployment**' provides additional protection for customers who wish to avoid more cost reflective tariffs following a meter replacement, meaning that the additional time is no longer required.

2. Residential and small business flexible load tariffs

Energy Queensland has explained that the requirement to defer implementation of flexible load tariffs for residential and small business consumers is driven by the need for additional unforeseen work on IT systems. The RRG is comfortable with the proposed new implementation timeline and contingent tariff adjustment arrangements for implementation of these tariffs. Our concern lies with the imperative for Energy Queensland to provide better information and detail for customers on the costs and benefit of a dynamic connection agreement, particularly given the deferral of two-way pricing. We are optimistic that a delay in implementation of flexible load tariffs will afford Energy Queensland more time to develop a comprehensive information package for customers.

3. Contingent tariff adjustments for time of use windows to maintain peak, off-peak and shoulder period alignment

Uncertainty is currently a predominant feature of the national electricity market. The proposal by Energy Queensland to introduce a contingent trigger to adapt TOU charging windows to maintain peak and off-peak alignment is in our view a sensible and pragmatic approach to dealing with the level of demand uncertainty over the next 5 years. It is far preferable to resorting to a re-opening provision in these circumstances. We support the proposed amendments.