

Policy and Regulatory Working Group

Consultation Paper

February 2021

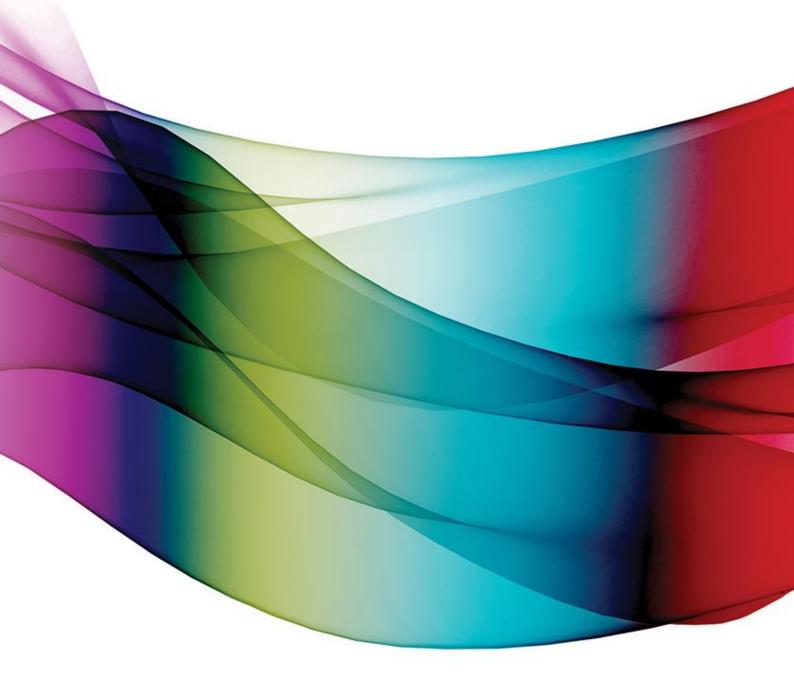


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Glossary and commonly used phrases

Australian Energy Market Operator (AEMO)	The National Energy Market Operator and planner.				
Australian Energy Regulator (AER)	The economic regulator and enforcer of the energy rules.				
Cost reflective tariff	A tariff that charges the user based on underlying drivers of future investment.				
Customer group	A way of aggregating customers that share similar characteristics, such as usage and behaviour patterns.				
Distributed Energy Resources (DER)	Refers to smaller generation or storage units such as solar panels, batteries or electric vehicles.				
Default assignment	Refers to customers being automatically assigned to a specific tariff when either connecting to the network or when their characteristics change (please note: default assignment may occur at different times depending on the distribution network service provider's tariff strategy).				
Electric Vehicles (EVs)	A vehicle that derives all or part of their power from electricity supplied by the electric grid.				
Flat rate tariff	A single fixed price for the use of the network, which does not vary with time of use.				
Low Voltage (LV)	The National Electric Code considers voltages <1000 volts to be low voltage. For the purpose of this document, low voltage commonly refers to electricity usage of small business or residential customers.				
Mandatory assignment	Refers to a type of prescribed tariff assignment where customers must remain on the default network tariff the distributor assigns to them.				
Network Tariff	A charge, or a combination of charges, applied to the provision of network services, specifically, the provision of a customer's connection to the shared electricity network and the delivery of the electricity used by that customer via that network.				
Obsolete	Obsolete network tariffs are no longer available to new installations or able to be applied to an existing installation not already assigned to the obsolete tariff.				
Opt in	A type of tariff assignment that occurs when a customer notifies their retailer of their desire to opt <u>into</u> a particular network tariff.				
Opt out	A type of tariff assignment that occurs when a customer notifies their retailer of their desire to opt <u>out</u> of a particular network tariff.				
Substation	Part of an electrical generation, transmission, and distribution system. Among other important functions, substations connect the high voltage transmission network and the low voltage distribution network – from which our residential customers and the majority of our business customers connect.				

Tariff Class	A class of retail customers with similar characteristics that are grouped together so that similar customers pay similar prices.		
Tariff Structure	Refers to the shape, form or design of a tariff, including its different components (or charges), as well as, in some cases, how they interact. Network tariff structures determine how a network operator calculates how much an individual customer is charged for using its network.		
Time of use	A type of cost reflective tariff that applies different prices for electricity at different times of the day, week or year.		

1. Introduction

1.1. Purpose of this document

The purpose of this report is to provide additional information to the members of the Policy and Regulatory Working Group (**PRWG**).

The focus of this paper is to:

- Understand the financial benefits and potential savings of our cost reflective network tariffs for our customers.
- Determine whether it is necessary to employ levers to encourage stronger uptake of cost reflective network tariffs.
- Explore opportunities to improve our network tariff assignment policy, particularly for low voltage business customers.

1.2. The Policy and Regulatory Working Group

Our PRWG members are supporting the development and submission of the 2024-29 regulatory and revenue proposal by providing input on key regulatory decisions and pricing strategy development.

During 2020, we held two PRWG forums and released two consultation papers. This is the first consultation paper for 2021. More information on these forums and papers can be found in <u>Section 8</u>.

2. Pricing strategy overview

2.1. Network tariff reform

Electricity distributors are transitioning to cost reflective network tariffs to signal the different cost of providing electricity to customers with differing patterns of consumption. TasNetworks' aim is to progressively shift the residential and small business customer base in Tasmania to more cost reflective network pricing over successive regulatory periods. This shift will support more efficient network utilisation, thereby putting downward pressure on network charges for all customers.

Cost reflective pricing represents a significant change in the way distributors have historically charged for the delivery of energy to retail customers and the process of network tariff reform continues to evolve based on feedback from stakeholders, customers and the transformative state of the industry.

2.2. Stakeholder engagement and feedback

Jun 2020: Oct 2020: Mar 2021:
Principles Tariff Tariff
and Assignment Assignment
Customer and DER and
Engagement Structure

In October 2020, we met with our PRWG members to discuss the uptake of cost reflective network tariffs and distributed energy resources (**DER**). During this discussion, our stakeholders told us that to encourage the take up of cost reflective network tariffs, more information was required to support customers in the transition, particularly in relation to the financial benefits and potential savings associated with the transition to more cost reflective tariffs.

We also discussed the opportunities and impact of increased DER connected to the Tasmanian distribution network. Members discussed a range of varying network challenges associated with the increased penetration

of these technologies (solar PV, batteries and electric vehicles) and that different DER technology has different challenges associated with it.

There was a discussion on how TasNetworks can develop a network pricing structure to prepare for the future continued penetration of these technologies. A common theme of education, communication and public consultation emerged. Members proposed that TasNetworks consider extensive consultation, information and data provision, case studies, and customer behaviour trends to ensure TasNetworks develops an appropriate pricing structure that meets the needs of both the network and Tasmanian customers.

More details on what was discussed during this forum can be found in the <u>PRWG Forum Minutes and Actions</u> (<u>October 2020</u>), also found in <u>Section 8</u> of this paper.

2.3. Meeting peak demand

Network costs are driven by the need to meet peak demand across the distribution network. Peak demand is impacted by population growth¹, government stimulus packages and how our customers use the network.

Tasmania's peak demand days occur over winter and are a result of an increase in heating load. Typically, our peak demand period occurs on a cold weekday morning. This differs to all other jurisdictions in the NEM where peak demand occurs on hot summer days due to an increase in air-conditioning load.

Tasmania's winter peak is evidenced by the demand placed on TasNetworks' substations over the last five years (Figure 1). Among other important functions, substations connect the high voltage transmission network and the low voltage distribution network — from which our residential customers and the majority of our business customers connect. Analysis of these substations show that approximately 85 per cent have peaked in winter over the last five years. Figure 1 shows that of those peaking substations, 30 per cent of substations peak between 8am and 9am in the morning and 26 per cent of our substations peak between 6pm and 7pm. This is consistent with our past analysis of network peak days (Figure 6) which demonstrated that the winter morning has higher peaks and the evening peak is slightly lower.

Further, these substation peaks align well with the current residential time of use peak windows between 7am to 10am and 4pm to 9pm. It should be noted that there are differences between the regions, for example, the North-West urban areas peak a little later in the morning, Launceston peaks exclusively in the morning and Hobart has the highest percentage of substations that peak in the evening.

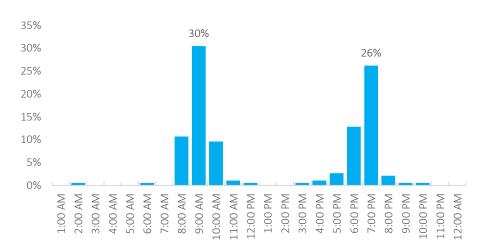


Figure 1 - TasNetworks zone substation peaks by hour of day for winter for 2016-2020

¹ Between 2019 and 2029 Tasmania's population is expected to grow from 530,712 people to 553,802 people – an increase of 4.4%. (Source: https://www.treasury.tas.gov.au/economy/economic-data/2019-population-projections-for-tasmania-and-its-local-government-areas). Note: this forecast was prepared prior to COVID-19.

Substation peaks are very different over the summer months, as Figure 2 demonstrates. More substations peaked between 10pm and 11pm over summer. These summer peaking substations are located outside the main population areas, most likely as a result of the utilisation of the network off peak times used by irrigators, the irrigation tariff (TAS75), some larger industrial customer and the effect of summer tourism. Further work will investigate the summer peaks when we look at the irrigation, embedded networks and DER tariffs.

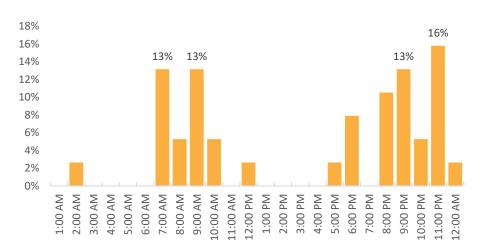


Figure 2 - TasNetworks zone substation peaks by hour of day for summer for 2016-2020

2.4. Emerging issues impacting pricing reform across the National Energy Market

Developing cost reflective network tariffs is a complex process and there are a range of views about what constitutes the most cost reflective network tariff structure. This is reflected in the variety of network tariff designs put forward by Distribution Network Service Providers (**DNSPs**) since the changes made to the National Electricity Rules (**the Rules**) in 2014 requiring the transition to cost reflective network pricing.

DNSPs also differ in their use of additional levers, such as discounts and/or closing legacy tariffs, to incentivise the uptake of cost reflective network tariffs.

In practice, network tariffs are also required to strike a balance between cost reflectivity and a range of competing factors, such as equity, simplicity and technological neutrality, which can mean that some design elements that might increase cost reflectivity may not be practicable or be met with customer or stakeholder support. The development of TasNetworks' distribution network tariffs requires an understanding of these competing factors and emerging issues in the electricity market.

As discussed in our last meeting, there are a number of transitional approaches across the National Energy Market (**NEM**). Recently the Victorian DNSPs – AusNet Services, Jemena, United Energy, Powercor and CitiPower – submitted their network tariff proposals for the next regulatory period (2021-26). To support the move to cost reflective tariffs, discounts have been proposed as well as the removal of access to legacy network tariffs, essentially making these legacy network tariffs obsolete. Progress towards cost reflectivity is informed by the advanced meter roll out, evolving technologies, impacts on customers and customer preferences.

This consultation paper explores whether it is necessary and appropriate for TasNetworks to employ additional levers to incentivise the uptake of time of use network tariffs in Tasmania.

Summary of key points

- TasNetworks' residential peak windows align well with our network peak times, which occur on winter mornings and evenings.
- A key focus of this consultation paper is to understand and prompt discussion with stakeholders as to
 whether additional levers are required to incentivise the uptake of time of use network tariffs in
 Tasmania.
- Additional levels could include a discount for the cost reflective network tariffs to incentivise customer
 uptake and removing access to legacy network tariffs (which would make the flat rate network tariff
 obsolete) for all new customers and/or customers who have moved onto a cost reflective tariff.

Question 1. Should TasNetworks make the flat rate tariff obsolete for residential customers? Why, why not?

Question 2. Should TasNetworks provide a discount for the cost reflective network tariff options for residential customers? Why, why not?

3. Residential customers

The rate of uptake of cost reflective network tariffs differ across the NEM, partly due to the level of supporting technology. However, other factors, such as the network tariff assignment policy can influence the speed of the transition towards more cost reflectivity.

This section focuses on TasNetworks' residential customers and seeks to:

- compare the uptake of cost reflective network tariffs against other jurisdictions; and
- identify the network tariffs that our residential customers are using.

3.1. Pace of network tariff reform in Australia – residential customers

Figures 1 and 2 plot the proposed uptake of cost reflective network tariffs, showing the percentage of all residential customers expected to be assigned to a cost reflective network tariff over the DNSPs' five year regulatory period for New South Wales, Queensland, the Northern Territory and South Australia². This information has been sourced from the Australian Energy Regulator (AER).

There is a steady increase of between 30 per cent and 50 per cent of customers on cost reflective network tariffs (with the exception of Energex).

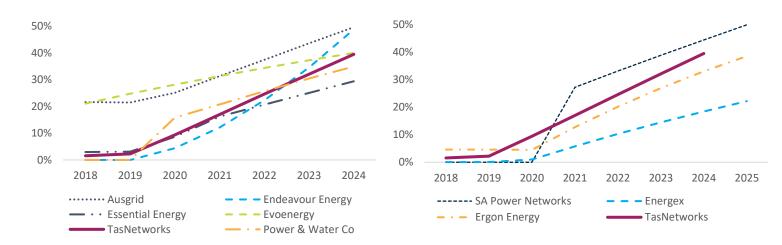
TasNetworks' network tariff strategy is compared against two groups, where:

- the DNSPs current regulatory period is consistent with TasNetworks (2019-24) (Figure 3); and
- for the DNSPs where the regulatory control period is 2020-25 (Figure 4).

² Ausgrid (NSW), Endeavour Energy (NSW), Essential Energy (NSW), Evoenergy (NSW), Power and Water Co (NT), South Australia Power Networks (SA), Energex (Qld), Ergon (Qld)

Figure 3 - Percentage of residential customers whose retailers face cost reflective network tariffs where the current regulatory period ends in 2024

Figure 4 - Percentage of residential customers whose retailers face cost reflective network tariffs where the current regulatory period ends in 2025



Source: Australian Energy Regulator³

Note: TasNetworks is reflected on both graphs as a comparison

3.2. Tas Networks' residential customers

Table 1 shows that 86 percent of our distribution network consists of residential connected customers – 26 per cent have advanced meters and 12 per cent of customers are currently on cost reflective network tariffs.

However, this low uptake of the cost reflective network tariffs is not representative of the customers who are on advanced meters – 47 per cent of customers on advanced meters have taken up cost reflective network tariffs.

Table 1 – Summary of the Tasmanian residential distribution network customer

251,500 active residential distribution network connections 85.8% of all TasNetworks customers
65,317 advanced meters have been rolled out to residential premises in Tasmania 26.0% of all residential customers
30,736 of residential customers are on cost reflective network tariffs 12.2% of all residential customers 46.7% of residential customers who are on advanced meters

Source: TasNetworks customer analysis as at 31 October 2020

There are four main types of network tariff structures currently offered (Table 2), with the predominant network tariff being general light and power tariff (TAS31).

³ https://www.aer.gov.au/networks-pipelines/network-tariff-reform#tariff-structure-statements downloaded on 30 November 2020. The charts have been amended to make them easier to read.

Table 2 – Summary of the Tasmanian residential distribution network customer tariff profile

 Flat Rate (TAS31) 87.8% of all residential customers	- Fixed service charge - Single anytime usage charge
Time of Use Consumption (TAS93) 12.2% of all residential customers	- Fixed service charge- Peak and off peak charging that variesdepending on the time of day
Time of Use Demand (TAS87) / Time of Use Distributed Energy Resource Demand (TAS97) 0% of all residential customers	 Fixed service charge Peak and off-peak demand charge c/kW/day that varies depending on the time of day

These tariffs may be used in conjunction with other network tariffs (Table 3), in accordance with the tariff assignment policy. Table 3 shows that:

- approximately 94 per cent of customers on the general light and power tariff also have the additional hot water and heating tariff (TAS41).
- 19,139 customers are connected to the controlled low voltage energy off peak with afternoon boost (TAS61) 82.6 per cent of these customers also have the heating and hot water tariff (TAS41) connected.
- 362 customers are connected to the controlled low voltage energy night period (TAS63):
 - 42.8 per cent of those customers have the heating and hot water tariff (TAS41) connected.
 - 50.3 per cent of these customers are connected to the time of use consumption tariff (TAS93).

Appendix 1 summarises TasNetworks' residential network tariffs including high level statistics, the assignment policy and charging components.

Table 3 – Summary of the Tasmanian residential distribution network customer tariff profile for tariffs to be used in conjunction with the main tariff

,,,,,	206,667 residential customers are connected to Heating and Hot Water (TAS41) 93.6% of all TAS31 customers
	 19,139 residential customers are connected to controlled low voltage energy off peak with afternoon boost tariff (TAS61) 7.6% of all residential customers 82.6% of these customers also have the heating and hot water tariff (TAS41) connected
(4*	 362 residential customers are connected to Controlled low voltage energy night period only tariff (TAS63) 42.8% of these customers also have the combined general (TAS31) and heating and hot water tariff (TAS41) connected 50.3% of these customer are connected to the time of use consumption tariff (TAS93)

Images courtesy of Kiranshastry and Freepik via www.flaticon.com

Note that the demand network tariffs (TAS87 and TAS97) are not currently offered by retailers in Tasmania.

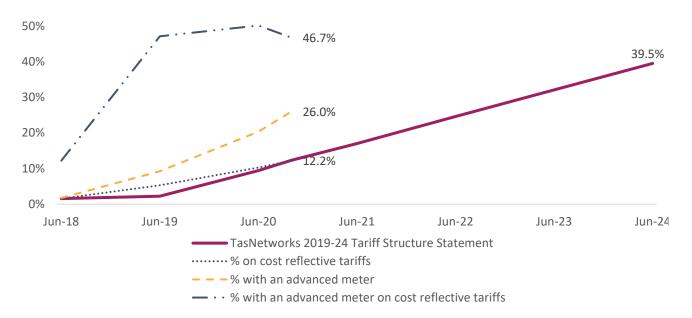
3.3. Pace of network tariff reform at TasNetworks – residential customers

The roll out of advanced meters predicates the potential number of customers who can move from a flat rate to a cost reflective network tariff.

Figure 5 compares TasNetworks' progress against the projected trend from TasNetworks 2019-24 Tariff Structure Statement. As at the end of the 2019/20 financial year 10.3 per cent of all residential customers were on cost reflective network tariffs, this has increased to 12.2 per cent at the end of October 2020.

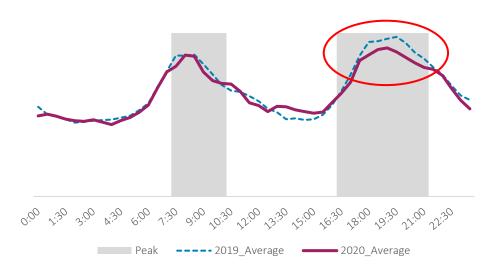
However, by the end of October, 26.0 per cent of residential customers have advanced meters. Of those residential customers who have an advanced meter, 46.7 per cent are on cost reflective network tariffs.

Figure 5 – Percentage of residential customers on cost reflective network tariffs and advanced meters



As presented in our October 2020 PRWG meeting, we are seeing a response among those customers who are changing to a cost reflective network tariff (Figure 6) indicating that there may be some responsiveness among our residential customers to change their consumption behaviour based on their selected network tariff.

Figure 6 – Comparison of Network Peak Day for 2019 and 2020 for Customers who moved from a Flat Rate Tariff (TAS31/41) to a Cost Reflective Tariff (TAS93) (n=503)



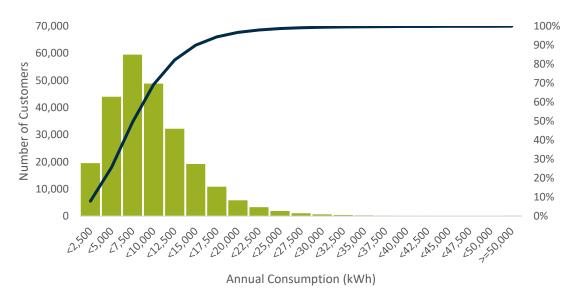
Summary of key points

- The roll out of advanced meters predicates the potential number of customers who can move from a flat rate to a cost reflective network tariff.
- 26 per cent of all residential customers have advanced meters.
- 12 per cent of all residential customers are on cost reflective network tariffs, however 48 percent of customers on advanced meters are on cost reflective network tariffs.
- We are seeing a response among those customers who are changing to a cost reflective network tariff (Figure 4). This indicates that there may be some responsiveness among our residential customers to change their consumption behaviour based on their selected network tariff.

3.4. Annual consumption of our residential customers

Figure 7 reflects the annual consumption information of residential customers at the end of October 2020. There were 248,161 residential customers that have been active for 12 months or more and the majority (approximately 97 per cent) of residential customers consume less than 20,000 kWh per annum. The median consumption is approximately 7,500 kWh, average consumption is slightly higher at approximately 8,500 kWh. The maximum residential consumption for the prior 12 months was over 195,000 kWh.

Figure 7 - Distribution of residential customers based on their annual consumption



We have observed that annual consumption among residential customers differ. Figure 8 shows information for residential customers who are currently on the flat rate network tariff (TAS31/41) or who have switched to the time of use consumption network tariff (TAS93) in 2020.

30% ■ All customers, n=219,047 ■ Customers with interval meters, n=11,353 ■ Customers who switched to time of use (TAS93), n=186 25% 20% % of Customers 15% 10% 5% 0% < 17,500 < 2,500 < 7,500 < 10,000 < 12,500 < 15,000 < 20,000 < 20,000+ < 5,000

Figure 8 – Analysis of customer behaviour either on the flat rate tariff or have recently moved from the flat rate tariff

 Approximately 90 per cent of customers ("All Customers") currently on the flat rate network tariff (TAS31/41) consume less than 12,500 kWh per year, with 53 per cent of customers consuming between 2,500 kWh and 7,500 kWh.

Annual Consumption (kWh)

- The consumption profile changes when the customer has both a flat rate network tariff and an interval meter "Customers with Interval Meters". The proportion of customers who consume less than 7,500 kWh per year decline (52 per cent versus 63 per cent). However, this customer group increases their consumption over the other categories, particularly between 7,500 kWh and 10,000 kWh.
- Customers who have switched from the flat rate network tariff (TAS31/41) to the time of use consumption network tariff (TAS93), show similar consumption changes to those who have received a meter. The proportion of customers consuming less than 5,000 kWh is much lower than all customers on the flat rate network tariff. Annual consumption increases when consumption is more than 10,000 kWh for these customers.

3.5.Network charge impact for residential customers moving to a time of use consumption tariff

Figure 9 demonstrates the network charge range for customers who have been on the flat rate network tariff (TAS31/41) throughout the entire 2019/20 financial year and had advanced meter readings for the entire period⁴. For each customer, the annual network charge was calculated for both the flat rate (TAS31/41) and the time of use (TAS93) consumption network tariffs and the difference taken. The spread of the results are found in Figure 9.

- The analysis shows that 58 per cent of customers would benefit from switching to the cost reflective network tariff (TAS93) with average annual network charge savings of approximately \$58.
- The largest saving calculated was approximately \$1,600. This saving was generated for a customer whose consumption is greater than 85,000 kWh and their off peak usage ratio was high at 74 per cent (compared to the average off peak ratio of 68 per cent). However, these data points represent outliers in the dataset.

It is observed that slightly more residential customers would benefit by switching to the cost reflective network tariff (TAS93) as the overall savings is approximately \$15.

⁴ The network tariff is used in the calculation

Figure 9 – Annual network charge for customers on the Flat Rate Consumption Tariff (TAS31/41) (n=11,353)

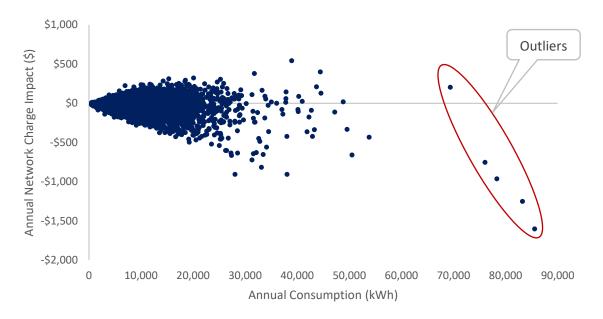


Figure 10 eliminates the outliers to present a clearer picture of the network charge on customers. The customers who are not likely to benefit from a cost reflective network tariff are those whose peak to off peak ratio is larger than the average residential customer.

Figure 10 – Annual network charge for customers on the Flat Rate Consumption Tariff (TAS31) (n=11,348)

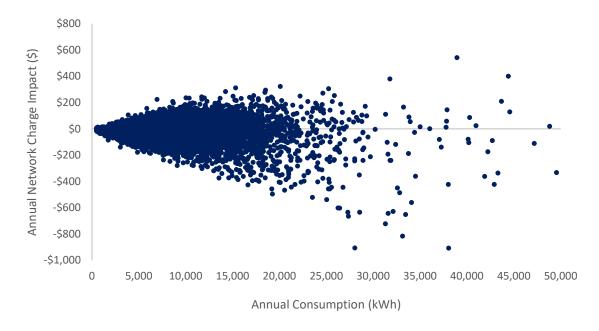
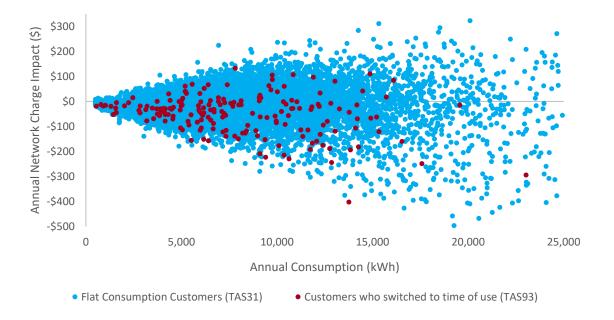


Figure 11 overlays the impact of the annual network charge for those customers who have moved to a cost reflective network tariff from the flat rate network tariff (note the scale has been reduced to provide better visibility over the time of use customers). The impact to customer's annual network charge is calculated based on current usage patterns and does not attempt to determine a change in individual behaviour, however as a group, these customers reduced their peak percentage moderately by approximately one per cent. Approximately 80 percent of the customers who switched to time of use have benefitted, however this is mostly likely due to a customer initiated change.

For those flat rate customers (TAS31/41) who would benefit from being on the time of use tariff (TAS93), their peak to off peak ratio is generally lower than those who are better off on the flat rate tariff (TAS31), with the

ratio being 42 per cent compared to 54 per cent respectively. The average network charge savings for those customers who have switched is \$55 per annum (in network charges).

Figure 11 – Annual network charge for customers on the Flat Rate Consumption Tariff (TAS31) vs Time of Use Consumption Tariff (TAS93)



Customers who peak electricity consumption that is approximately less than 27 per cent of their total consumption generally benefit the most by moving to the cost reflective network tariff (TAS93).

Conversely, the customers who are more disadvantaged from moving to a cost reflective network tariff are those whose peak electricity consumption is over 38 per cent of their total electricity consumption. Both these customer groups are consume the same amount of kWh per annum - 13,404 kWh per annum for customers who benefit compared to 13,357 kWh per annum for customers who do not benefit.

Summary of key points.

- 50 per cent of residential customers' consumption is less than 7,500 kWh and 97 per cent of residential customers consume less than 20,000 kWh.
- 58 per cent of all residential customers who are currently on a flat rate network tariff would be better off on cost reflective network tariffs.
- Customers who are less likely to benefit under the cost reflective network tariff tend to have a lower peak to off peak ratio.
- Network tariff assignment policy changes in other jurisdictions are not applicable to Tasmania due to:
 - different peak periods and seasonal impacts influencing network utilisation;
 - cost reflective network tariff uptake as a proportion of the advanced meter penetration rates; and
 - TasNetworks' current network tariff assignment policy is already supporting a transition to cost reflective network tariffs.

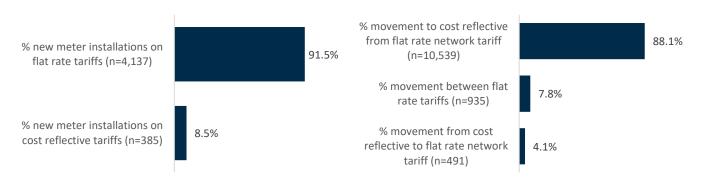
3.6. Residential customers moving directly onto or back to a flat rate network tariff.

Since July 2019, and excluding customers who were historically on Aurora Energy's PAYG tariff (TAS101):

- Approximately 92 per cent of new meter installations were for flat rate network tariffs (Figure 12). There is also a small number of customers (4.1%) who move back from a cost reflective network tariff (TAS93) to the flat rate network tariff (TAS31/41) (Figure 13).
- 11,965 residential customers have moved or altered their network tariffs, approximately four per cent have changed their tariff back to a flat rate network tariff (TAS31/41) from the cost reflective network tariff (TAS93), and 8 per cent have altered their flat rate network tariff - mainly by either adding or removing the heating and hot water tariff (TAS41) or adding or removing an export tariff (Figure 13).

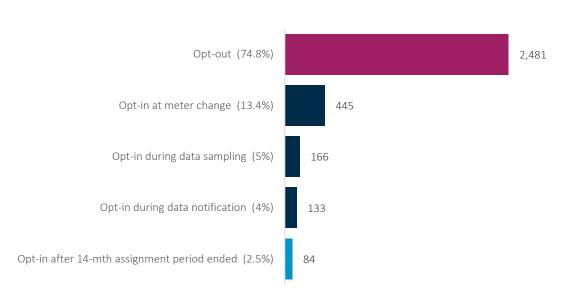
rate or cost reflective

Figure 12 - Percentage of new meter installations that are either flat Figure 13 - Percentage of customers who have moved between cost reflective and flat rate tariffs.



In addition to this, approximately 75 per cent of residential customers are opting out from moving to a cost reflective tariff under TasNetworks' current assignment policy (Figure 14).

Figure 14 - Network Tariff Assignment Policy since July 2019 – residential customers



3.7. Network tariff assignment policies for distribution customers

TasNetworks, consistent with all DNSPs, must assign a customer to a specific network tariff and there are several considerations for this process as outlined in the Rules. These considerations include:

- the nature of the customer's connection;
- the customers' forecast/expected usage and size, or typical usage by customers in the same customer class; and

• the principle that customers with similar connection and usage profiles are treated on a consistent basis.

In addition, customers with microgeneration facilities (e.g. solar PV or batteries), must not be treated less favourably than other customers.

To that end, TasNetworks' tariff assignment policy specifies that the consumption based time of use network tariffs are the default network tariffs for all new small business and residential connections from 1 July 2019. They are also being applied to small business customers and home owners that modify or upgrade their connections, as well as small businesses and homes that have their meter(s) replaced with an advanced meter.

However, time of use tariffs are not applied immediately. A 12 month delay is applied to each customer, to enable a year's worth of metering data to be collected before the changeover to a time of use network tariff takes effect. Following the conclusion of the 12 month period, customers can elect, through their retailer, to opt out of the default time of use network tariff. Retailers have two months to notify TasNetworks of this change before we begin billing the customer's retailer on a time of use basis.

As the transition to cost reflective tariffs continues across the NEM, mandatory assignment policies are becoming more prevalent with customers unable to opt out of a cost reflective network tariff. More detail on the residential network tariff assignment policy for each DNSP in the NEM is summarised in Appendix 1.

3.8. Incentivising residential cost reflective network tariff uptake

TasNetworks needs to consider the uptake pace of cost reflective network tariffs into the next regulatory period. As discussed, the roll out of advanced meters determines the potential number of customers who can move from a flat rate to a cost reflective network tariff.

Currently, 48 per cent of customers who have advanced meters are on a cost reflective network tariff. However, when compared to all residential customers regardless of meter type, the number of customers on a cost reflective network tariff is only 12 per cent.

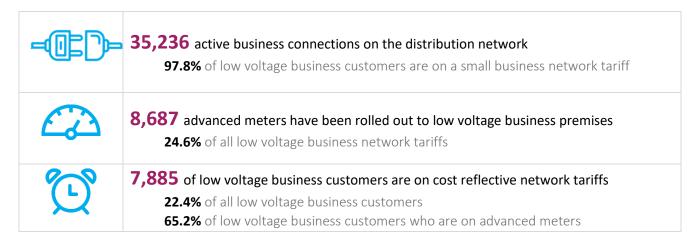
Based on the interval data available, TasNetworks estimates that approximately 58 per cent of residential customers who are currently on a flat rate network tariff would be better off on a cost reflective network tariff. Customers who are less likely to benefit under the cost reflective network tariff tend to have a lower peak to off peak ratio.

Question 3. As we continue the transition to cost reflective network tariffs, how can TasNetworks support customers to realise the benefits of cost reflective pricing? What type of educational tools and resources are required?

4. Low Voltage Business Customers

4.1. Summary of TasNetworks' low voltage business customers

Table 4 – Summary of the Tasmanian low voltage business distribution network customer



Source: TasNetworks' customer analysis as at 31 October 2020

All customers must be assigned to a specific network tariff that reflects their connection type and usage profile. For low voltage business customers there are two tariff classes available to select – small business or large business⁵. For large business customers, TasNetworks offers only cost reflective network options – that is, there are no flat rate network tariffs specifically available for large businesses. This has been designed in order to reflect the long term marginal cost and provide effective price signals to our customers.

The network tariff assignment policy for all distribution customers can be found in <u>Section 3.7.</u> Nearly 98 per cent of the distribution network business connections are for customers who are connected to small business network tariffs (Table 4).

As at 31 October 2020, there were 34,897 low voltage business customers who had been active for more than 12 months (Table 5).

 ${\it Table}~5-{\it Statistics}~on~{\it Low}~{\it Voltage}~{\it Business}~{\it Customers}~consumption~usage$

	Total LV Business	Large LV Business	Small LV Business
Number of customers	34,897	777	34,120
Highest kWh consumption	8,836,210	8,836,210	3,254,96
Average kWh consumption	37,277	565,004	25,259
Median kWh consumption	5,188	312,226	4,883
Quartile 1 kWh consumption	890	135,974	844
Quartile 3 kWh consumption	20,491	747,368	18,664
Interquartile range	19,601	611,394	17,820

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⁵ Defined by TasNetworks <u>Revised Tariff Structure Statement</u> for the Regulatory Control Period 1 July 2019 to 30 June 2024.

4.2. Distribution of TasNetworks' low voltage business customers

TasNetworks provides a range of tariffs that are suitable for small and large businesses. Approximately 80 per cent of our business customers' consumption is less than 30,000 kWh per annum. Figure 15 shows the distribution of customers within the small business network tariff class.

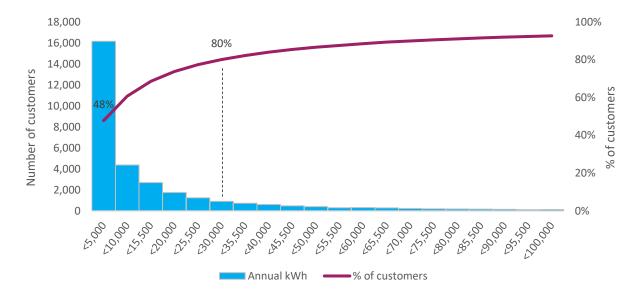


Figure 15 - Distribution of low voltage business customers

4.3. Profile of TasNetworks' low voltage business customers

Demand based network tariffs are generally taken up by customers with a flat load profile, most likely for those businesses that operate 24/7 (Figure 16). These customers have a lower peak to off peak demand ratio relative to their consumption levels than customers on other low voltage business network tariffs. This flatter profile means that these customers tend to be relatively better off on a demand based network tariff than a consumption based network tariff.

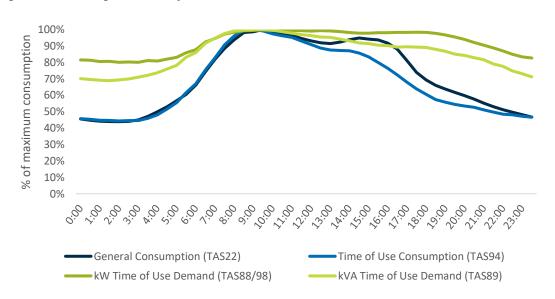


Figure 16 - Low Voltage Business Profiles

Clustering analysis has been undertaken to better understand the types of businesses and their profiles and the tariffs they will most likely select. There are five distinct groups of customers across the low voltage network (Figure 17).

Schools and small shops make up the largest number of customers, however have the lowest annual average consumption. Figure 17 shows that consumption increases from 7am – 9am then slowly decreases from 3pm. Out of all the customer groups, this group has the largest proportion (34 per cent) of these customers remaining on the flat rate network tariff (TAS22), however 64 per cent have moved to the time of use consumption network tariff (TAS94).

As expected, **24/7 operations** have the flattest profile of all customer groups – that is, the ratio between peak and off peak is low. This is the smallest customer group which has the largest annual average consumption. Approximately 75 per cent of these customers are on some form of demand tariff, approximately 18 per cent are on a time of use consumption network tariff, and the remaining seven percent are on the flat rate network tariff (TAS22).

The **9am-5pm shops** have the largest proportion (69 per cent) of customers on the time of use consumption tariff (TAS94), nine per cent of this customer group remain on the flat rate network tariff (TAS22).

Hospitality customers have the lowest proportion (four per cent) of customers on the flat rate network tariff (TAS22).

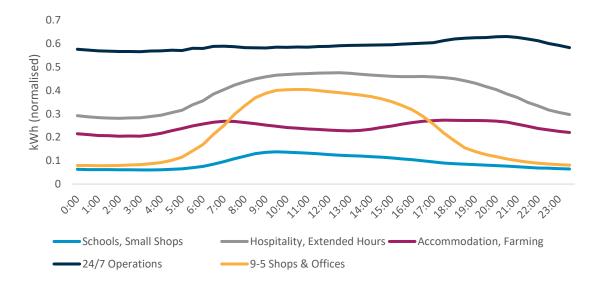


Figure 17 – Comparison of the load profiles of clustered low voltage business customers

Summary of key points.

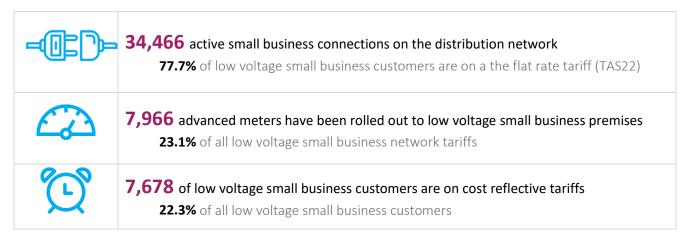
- TasNetworks provides a range of tariffs that are suitable for small and large businesses. Approximately 80 per cent of low voltage business customers have annual consumption that is less than 30,000 kWh.
- Demand based tariffs are generally taken up by customers with a flat load profile, most likely for 24/7 businesses. These customers have a lower peak to off peak demand ratio relative to their consumption levels than customers on other low voltage business network tariffs.
- 25 per cent of business customers are on advanced meters.
- 22 per cent of business customers are on cost reflective network tariffs, however 90 per cent of customers on advanced meters are on cost reflective network tariffs.

Due to the nature of the profiles and the inherent behaviour of these customers, the next section will focus on the small business low voltage customers on the flat rate network tariff (TAS22) or the time of use consumption network tariff (TAS94).

5. Low Voltage Small Business Customers

5.1. Summary of TasNetworks' low voltage small business customers

Table 6 - Summary of the Tasmanian low voltage small business distribution network customers



Source: TasNetworks customer analysis as at 31 October 2020

There are four main types of network tariff structures for small business low voltage customers (Table 7) – some of which can be used in combination of other network tariffs (Table 8). The predominant network tariff is the flat rate network tariff (TAS22) – approximately 78 per cent of small business customers are on the flat rate network tariff (Table 7). Appendix 2 provides a summarised comparison of TasNetworks' small business network tariffs.

Table 7 – Summary of the Tasmanian low voltage small business distribution network customer tariff profile

 Flat Rate (TAS22) 77.7% of all small business customers	- Fixed charge - Single anytime usage charge
Time of Use Consumption (TAS94) 19.7% of all small business customers	- Fixed charge- Peak and off peak charging that variesdepending on the time of day
Time of Use Demand (TAS88) 2.3% of all residential customers	 Fixed service charge Peak and off peak demand charge c/kW/day that varies depending on the time of day
 Distributed Energy Resource Demand (TAS98) 0.2% of all residential customers	 Fixed service charge Peak and off peak demand charge c/kW/day that varies depending on the time of day

The flat rate (TAS22) and time of use (TAS94) may be used in conjunction with other network tariffs (Table 8) according to the rules of the tariff assignment policy.

- A low number of small business customers on the flat rate (TAS22) tariff also have the heating a hot water tariff (TAS41) connected.
- Approximately two per cent of small business customers have the off peak with afternoon boost tariff (TAS61) and 15 per cent of those customers also have the heating and hot water (TAS41) tariff connected.
- For the small number of customers connected to the energy night period only tariff (TAS63), 40 per cent are connected to the time of use consumption (TAS94) tariff.

Table 8 - Summary of the Tasmanian small business distribution network tariff profile for tariffs to be used in conjunction with the primary tariff

1111	1,202 small business customers are connected to Heating and Hot Water (TAS41),4.5% of all TAS22 customers
(L)	 715 small business customers are connected to controlled low voltage energy off peak with afternoon boost tariff (TAS61) 2.1% of all small business customers 15.4% of these customers also have the heating and hot water tariff (TAS41) connected
	 62 small business are connected to Controlled low voltage energy night period only tariff (TAS63) 40.3% of these customers are connected to the time of use consumption tariff (TAS94) Only 1 business customer has the heating a hot water (TAS41) connected in addition to the TAS63 tariff.

Images courtesy of Surang, Icongeek26, Kiranshastry, Freepik and srip via www.flaticon.com

There is some interest in the demand based network tariffs – commercial time of use demand (TAS88) and the business low voltage distributed energy resources (TAS98).

5.2. Consumption profile of flat rate (TAS22) and time of use (TAS94) low voltage business customers

	33,589 active small business connections on the distribution network for this tariff class 74.6% are on the general flat rate network tariff (TAS22)
	7,089 advanced meters have been rolled out to this tariff class 21.1% of this customer group (customers on TAS22 or TAS94)
C	6,801 of this customer group is on the time of use consumption tariff (TAS94) 20.2% of this customer group (customers on TAS22 or TAS94)

The majority (77 percent) of our LV small business customers consume less than 15,000 kWh per year (Figure 18). Also a larger proportion of customers who consume more than 50,000 kWh per year are more likely to be on the time of use network tariff (TAS94).

Figure 18 – Consumption patterns of customers who are on a LV business tariff



Figure 19 shows the likely annual network charge impact for those customers currently on the flat rate tariff (TAS22). The call-out box displays the small number of customers who are unlikely to benefit from a cost reflective network tariff. For these customers average consumption is typically lower (approximately 4,900 kWh) than the average consumption for the group, and their peak time usage is higher as a proportion of their total consumption. Customers with lower consumption are less likely to benefit from a network tariff change.

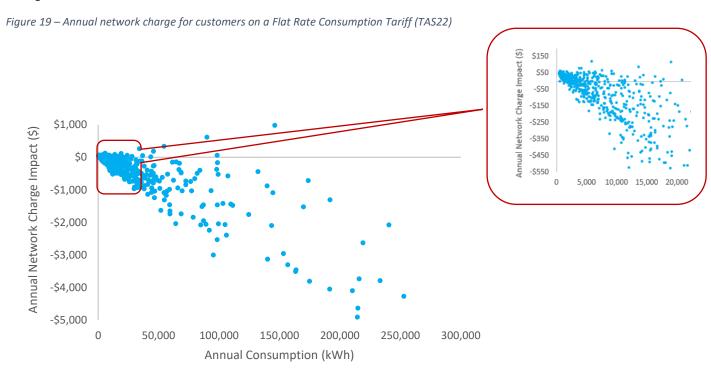
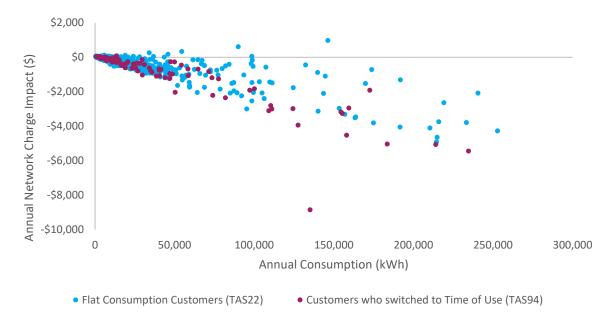


Figure 20 compares the network savings for those small business customers who have made the switch to a cost reflective time of use consumption network tariff (TAS94) compared to those who have remained on the flat rate network tariff (TAS22). Our calculations show that 90 per cent of customers who switched from the flat rate network tariff to the cost reflective network tariff reduced their network charges. The remaining 10 percent of customers are approximately \$50 worse off.

Figure 20 – Annual network charge for Time of Use Consumption (TAS94) vs Flat Rate Consumption Tariff (TAS22)



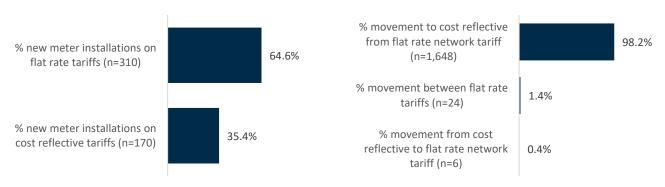
5.3. Pace of network tariff reform at TasNetworks – small business customers

The proportion of small business meter roll out remains low with 23 per cent of business having an advanced meter – this will influence the uptake of cost reflective network tariffs for small business customers – the majority of whom are likely to benefit from moving to cost reflective network tariffs.

Approximately 65 per cent of new meter installations for small business customers are for flat rate network tariffs (Figure 21). However, very few small business customers revert to a flat rate network tariff or move between flat rate network tariffs (Figure 22).

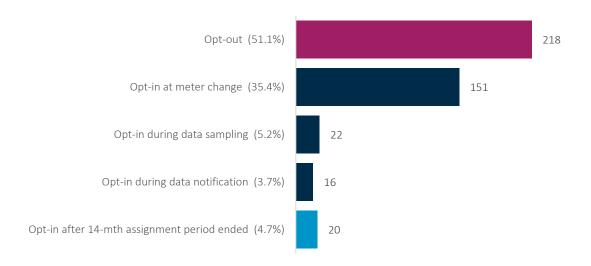
Figure 21 – Percentage of new meter installations that are either flat rate or cost reflective since July 2019

Figure 22 – Percentage of customers who have moved between cost reflective and flat rate tariffs since July 2019.



In addition, 35 per cent of small business customers opt in to small business network tariff at the time their meter is changed with another 9 per cent opting in during the data sampling and notification periods (Figure 23).

Figure 23 - Network tariff assignment policy since July 2019 - small business customers



5.4. Incentivising small business cost reflective network tariff uptake

Similar to residential customers, some DNSPs in the NEM are offering incentives to assist in the transition to cost reflective network tariffs. However, recent figures from Victoria reveal that approximately 44 per cent of small business customers have cost reflective network tariffs (this compares to 22 per cent in Tasmania).

The type of small business will determine the time they consume electricity and there may be very little room for certain businesses to change their consumption habits (as seen in Figure 17). This will limit opportunities for some small businesses to shift their load and take advantage of off peak network tariffs.

Victorian DNSPs are proposing a two-rate tariff for small business customers with a peak period between 9am to 9pm on weekdays⁶ (this compares to 7am to 10pm for TasNetworks). Victorian DNSPs also propose to move all legacy time of use network tariff customers on to the default new time of use network tariff on 1 July 2026 and remove the legacy time of use network tariffs from the network tariff schedule.

Currently TasNetworks has 22 per cent of its small business customers on cost reflective tariffs, however approximately 68 per cent of small business customers who have an advanced meter are on a cost reflective tariff. Based on our calculations of network charges, approximately 90 per cent of small business customers would be better off on the cost reflective tariff.

Question 4. How can TasNetworks support small business customers to realise the benefits of cost reflective pricing? What type of educational tools and resources are required? Does this differ to how we engage with our residential customers?

Question 5. Should TasNetworks make the flat rate tariff obsolete for small business customers? Why, why not?

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⁶ These state-wide charging windows result in tariffs that are not as cost reflective as they could be because they do not allow for differences in the network across the five Victorian regions. However, based on stakeholder feedback there was a strong desire for state-wide charging windows for residential and small business customers to assist these customers understand and respond to price signals.

5.5. Summary of low voltage business customer analysis

Summary of key points.

- TasNetworks provides a range of network tariffs that are suitable for small and large businesses. Approximately 80 per cent of our business customers' consumption is less than 30,000 kWh per annum.
- 25 per cent of business customers are on advanced meters.
- 22 per cent of business customers are on cost reflective network tariffs, however 90 per cent of customers on advanced meters are on cost reflective network tariffs.
- TasNetworks' analysis shows that the majority (77 percent) of our all our LV small business customers consume less than 15,000 kWh per year. Annual consumption drops slightly for those customers who are on interval meters.
- A larger proportion of customers who consume more than 50,000 kWh per year are more likely to be on the time of use tariff (TAS94).
- 90 per cent of business customers who have moved to the time of use consumption network tariff (TAS94) have reduced their network changes when compared to those who have remained on the flat rate network tariff (TAS22). The remaining 10 per cent of customers are predominately \$50 worse off annually.
- In Victoria, approximately 44 per cent of small business customers have cost reflective network tariffs (this compares to 22 per cent in Tasmania).
- Victorian DNSPS have proposed to move all legacy time of use network tariff customers on to the default new time of use network tariff on 1 July 2026 and remove the legacy time of use network tariffs from the tariff schedule. Victorian DNSPs have also proposed a discount on their cost reflective network tariffs for small and medium business customers.
- Network tariff assignment policy changes in other jurisdictions are likely not applicable in Tasmania due to:
 - different peak periods and seasonal impacts influencing network utilisation;
 - o cost reflective network tariff uptake as a proportion of the advanced meter penetration rates; and
 - TasNetworks' current network tariff assignment policy is already supporting a transition to cost reflective network tariffs.

6. Summary

Advanced meters and cost reflectivity

The rollout of advanced meters between the two customer types – residential and low voltage business – are similar in proportions, however the uptake of cost reflective tariffs differ.

- 12.2 per cent of all residential customers are on cost reflective tariffs, this compares to 22.4 per cent for low voltage business customers.
- 26.0 per cent of all residential customers have advanced meters and 46.7 per cent of those are on cost reflective tariffs.
- 24.6 per cent of all low voltage business customers have advanced meters which is a similar proportion to residential customers however 65.2 per cent of those customers are on cost reflective tariffs.

Customer tariff movements since July 2019

An increasing number of small business customers are likely to move to a cost reflective tariff when their meter is changed and when they are making changes to their tariff. Small business customers are less likely to revert back to a flat rate tariff.

- 91.5 per cent of residential new meter installations are connected to the flat rate tariff (TAS31). This
 differs significantly to small business customers where 64.6 per cent of new meter installations are
 connected to the flat rate tariff (TAS22).
- 88.1 per cent of residential customers who change their tariff change it to the cost reflective time of use tariff, however we are seeing small number (approximately four per cent) of residential customers revert back to the flat rate tariff. Nearly all small business customers who change their tariffs will move to a cost reflective tariff, very few small businesses are reverting back to the flat rate tariff.

Tariff assignment policy since July 2019

More residential customers are likely to opt out of the cost reflective tariff, however for both groups of customers, they are more likely to opt in when the meter is changed.

- 74.8 per cent of residential customers are opting out of moving to the time of use (TAS93) tariff. This compares to 51.1 per cent of small business customers opting out.
- Of those customers both residential and business who opt into the time of use consumption tariff, the
 majority will opt in as their meter is changed. This could indicate that the meter change is customer
 initiated.

Annual network charge impact

The annual network charge analysis revealed different results for both small business and residential customers.

- Approximately 58 per cent of residential customers currently on a flat rate tariff would benefit from switching to a cost reflective tariff with an average network charge saving of \$58 per annum. This compares to approximately 65 per cent of small business customers currently on the flat rate tariff (TAS22) are likely to benefit from switching to the cost reflective time of use tariff (TAS93).
- Of those residential customers who have already switched to the cost reflective tariff, approximately 80 per cent have benefited with average network savings of \$55 per annum. This is similar to small business customers, where approximately 90 per cent of those who have already switched to the cost reflective tariff have benefited.

Demand network tariffs

The residential demand network tariff is not offered by retailers in Tasmania. However, we are seeing demand based network tariffs being taken up by some businesses – these businesses appear to have a flatter consumption pattern than other businesses and their peak to off peak ratio is lower.

6.1. Summary of questions

Summary of consultation questions

Question 1. Should TasNetworks make the flat rate tariff obsolete for residential customers? Why, why not? [Refers to Section 2].

Question 2. Should TasNetworks provide a discount for the cost reflective network tariff options for residential customers? Why, why not? [Refers to Section 2].

Question 3. As we continue the transition to cost reflective network tariffs, how can TasNetworks support residential customers to realise the benefits of cost reflective pricing? What type of educational tools and resources are required? [Refers to Section 3].

Question 4. How can TasNetworks support small business customers to realise the benefits of cost reflective pricing? What type of educational tools and resources are required? Does this differ to how we engage with our residential customers? [Refers to Section 5].

Question 5. Should TasNetworks make the flat rate tariff obsolete for small business customers? Why, why not? [Refers to Section 5].

7. Request for submission

The transformation of the electricity industry is enabling our customer base to utilise our network services in more diverse ways than ever before. By providing your feedback you are ensuring our pricing strategy continues to reflect the needs and drivers of the Tasmanian community now, and into the future.

TasNetworks invites interested stakeholders to make submissions on this consultation paper by 20 December 2020.

Submissions on our consultation paper can be sent to regulation@tasnetworks.com.au

Alternatively, submissions can be sent to: Leader Regulation Tasmanian Networks Pty Ltd PO Box 606 Moonah TAS 7009 Phone 1300 127 777

8. Documents referenced

Policy & Regulatory Working Group Consultation Paper #1 (June 2020)
Policy & Regulatory Working Group Consultation Paper #2 (October 2020)
Policy & Regulatory Working Group Forum Minutes and Actions (October 2020)

Appendix 1 Summary of current residential network tariff suite

Residential Low Voltage ⁷	Time of Use Consumption (TAS93)	Time of Use Demand (TAS87)	DER Demand (TAS97)	General (TAS31)	Uncontrolled LV Heating (TAS41)	Controlled Energy Off- peak (TAS63)
Tariff Statistics (as at 31	October 2020)					
No. of residential customers (% of total residential customers).	30,733 12%	1	-	220,729 88%	Not applicable	Not applicable
No. of residential customers on advanced meters (% of total residential customers on advanced meters).	30,534 12%	1	-	34,782 14%	Not applicable	Not applicable
Tariff Assignment Summa	ary					
For Private Residential Dwellings for general supply use.	✓	✓	×	√	Not applicable	Not applicable
For Private Residential Dwellings where electricity storage, generation or electricity management devices have been deployed 'behind the meter'.	×	×	✓	×	×	×
For Private Residential Dwellings for water heating and/or space heating and/or domestic pools.	×	×	×	✓	excl. space heating	incl. space heating
Can be used on Farm Outbuildings provided the outbuildings are connected through the residential meter.	✓	✓	✓	×	×	×
Charging Component Sur	nmary					
Peak charge time		eekday 07:00 – 10 eekday 16:00 – 21		×	×	×
Off-peak charge time		/eekday 10:00 -16: eekday 21:00 – 07 Weekend All Day		×	×	×
Service charge	√	√	√	√	✓	√
Anyday or Anytime Consumption charge	×	×	×	Anytime	Anytime	Anyday 22:00 – 0700
Use with another tariff	TAS61	×	*	TAS41/TAS61	With TAS22	With TAS22/ TAS94

⁷ Excludes abolished/obsolete tariffs – PAYG (TAS101), Off peak with afternoon boost (TAS61), PAYG time of use (TAS92) 29

Residential and small business network tariff assignment⁸

Region	Distribution Network Service Provider	Default Network Tariff	Assignment Conditions	Flat rate network tariff available to opt in	Network Tariff Movement Options
Tasmania	TasNetworks	Time of Use Consumption	14 month delay	√	Flat rate network tariff. Small business customers can also opt into a demand tariff.
Victoria	AusNet Services	Time of Use Consumption	No conditions	√	Flat rate or demand network tariff.
Victoria	Jemena	Time of Use Consumption	No conditions	√	Flat rate or demand network tariff.
Victoria	CitiPower	Time of Use Consumption	No conditions	√	Flat rate or demand network tariff.
Victoria	Powercor	Time of Use Consumption	No conditions	√	Flat rate or demand network tariff.
Victoria	United Energy	Time of Use Consumption	No conditions	√	Flat rate or demand network tariff.
Queensland	Energex	Transitional Demand	No conditions	*	Time of use or new demand network tariff.
Queensland	Ergon Energy	Transitional Demand	12 month delay for 'passive customers'9	*	Time of use or new demand network tariff.
South Australia	South Australia Power Networks	Time of Use Consumption	Effective from 2020/21 ¹⁰	×	Prosumer network tariff. Small business customers can also opt into a demand tariff.
Northern Territory	Power and Water	Time of Use Consumption with a Summer Demand Charge ¹¹	No conditions	√	Flat rate or alternate network tariff.
Australian Capital Territory	Evo Energy	Residential demand	12 month delay for 'passive customers'	×	Time of use consumption network tariff.
New South Wales	Endeavour Energy	Transitional demand	No conditions	√	Flat rate or alternate cost reflective tariffs.
New South Wales	Ausgrid	Seasonal demand tariff	12 month delay and assignment of a demand tariff for 'passive customers'.	*	Time of use seasonal structure or a time of use consumption tariff.
New South Wales	Essential Energy	Time of use	No conditions	√	Flat rate tariff or time of use with demand component network tariff.

⁸ Tariff assignment is 'triggered' by a new customer connecting to the network, meter upgrade or meter replacement.

⁹ Passive customers are those where the trigger event is not initiated by the existing customer

¹⁰ Delay of new assignment policy due to COVID-19, the DNSP is wanting to provide more certainty

¹¹ October - March

Appendix 2 Summary of current small business network tariff suite

Small Low Voltage Business ¹²	Time of Use Consumption (TAS94)	Time of Use Demand (TAS88)	DER Demand (TAS98)	General (TAS22)	Uncontrolled LV Heating (TAS41)	Controlled Energy Off- peak (TAS63)				
Tariff Statistics (as at 31 October 2020)										
No. of LV small business customers (% of total LV small business customers)	6,801	800 2%	77 -	26,788 78%	Not applicable	Not applicable				
No. of LV small business customers on advanced meters (% of total LV small business customers on advanced meters)	4,576 13%	800 2%	77 -	2,513 7%	Not applicable	Not applicable				
Tariff Assignment Summary										
Not for Private Residential Dwellings for general supply use	√	√	×	✓	Not applicable	Not applicable				
Not for Private Residential Dwellings where electricity storage, generation or electricity management devices have been deployed 'behind the meter'.	×	×	✓	×	×	x				
Not for Private Residential Dwellings for water heating and/or space heating	×	×	×	×	excl. space heating	incl. space				
Charging Componer	nt Summary									
Peak charge time	Weekday 07:00 – 22:00	Weekday 07:00 – 10:00 Weekday 16:00 – 21:00		×	×	×				
Off-peak charge time	Anyday 22:00 – 0700	Weekday 10:00 -16:00 Weekday 21:00 – 07:00 Weekend All Day		×	×	×				
Shoulder charge time	Weekend 07:00 – 22:00	×	×	×	×	×				
Service charge	✓	✓	✓	✓	✓	✓				
Anyday or Anytime Consumption charge	×	×	×	Anytime	Anytime	Anyday 22:00 – 0700				
Use with another tariff	✓ TAS61	×	×	✓ TAS41/TAS61	With TAS22	With TAS22/ TAS94				

¹² Excludes abolished/obsolete tariffs – Nursing Homes (TAS34), Curtilage (TASCURT) and Irrigation (TAS75) 31

Definitions based on usage for small, medium and large business across jurisdictions

Region	DNSP	Definition based on usage	Definition of LV large business	Definition of medium business	Definition of Small Business	
Tasmania	TasNetworks	×	No usage definition.	No usage definition.	No usage definition.	
Victoria	AusNet Services	√	>400MWh per year	>40MWh per year <400MWh per year	<40 MWh per year <160MWh per year	
Victoria	Jemena	√	>400MWH or maximum demand >120KW per year	>40MWh per year <400MWh per year	<40 MWh per year <120kVA	
Victoria	CitiPower	✓	>160 MWh per year >120kVA max demand	<160 MWh with a maximum demand of <120 kW	<60 MWh per year	
Victoria	Powercor	√	>160 MWh per year >120kVA max demand	>60 MWh per year <160 MWh with a maximum demand of <120 kW	<60 MWh per year	
Victoria	United Energy	√	>400 MWh per year >150 kVA max demand	>40 MWh per year <400 MWh per year with a maximum demand of <150 kW	<40 MWh per year	
Queensland	Energex	✓	>100MWh per year	<100MWh per year	<100MWh per year	
Queensland	Ergon Energy	✓	>100MWh per year	<100MWh per year	<100MWh per year	
South Australia	South Australia Power Networks	✓	>160MWh per year	<160MWh per year	<160MWh per year	
Northern Territory	Power and Water	✓	>750MWh per year	<750MWh per year	<750MWh per year	
Australian Capital Territory	Evo Energy	×	No usage definition.	No usage definition.	No usage definition.	
NSW	Endeavour Energy	✓	>160MWh per year	<160MWh per year	<160MWh per year	
NSW	Ausgrid	✓	>40MWh per year	>40MWh per year	<40MWh per year	
NSW	Essential Energy	√	<160MWh per year	<160MWh per year	<160MWh per year	