Submission to the Australian Energy Market Commission

Pricing Review: Electricity Pricing for a Consumer-Driven Future (EPR0097)

By: Victoria Energy Future Network

Date: 12 February 2026

Subject: Formal Response to the Draft Report Recommendations on Network Tariff Design and Fixed Charges

1. Executive Summary

This submission provides a comprehensive analysis of the Australian Energy Market Commission's (AEMC) Draft Report for the *Electricity Pricing for a Consumer-Driven Future* review (EPR0097), published in December 2025. This review arrives at a critical juncture for the National Electricity Market (NEM), as the rapid decentralisation of energy generation clashes with legacy regulatory frameworks designed for a centralised, one-way system. The Commission's Draft Report rightly identifies the tension between the accelerating adoption of Consumer Energy Resources (CER), including rooftop solar photovoltaics (PV), battery energy storage systems (BESS) and electric vehicles (EVs), and the recovery of residual network costs. However, the Draft Report's apparent direction toward network tariffs that are predominantly fixed, with a dynamic component layered on top, risks undermining the energy transition, exacerbating social inequality and stifling the very innovation required to lower total system costs.

The Draft Report's proposal to recover a greater share of residual network costs through fixed charges, rather than through volumetric or capacity-based mechanisms, is economically inefficient and socially regressive. By increasing the unavoidable cost of grid access, this approach effectively functions as a poll tax on electricity consumers, disproportionately burdening low-income households, renters and energy-efficient users who cannot reduce their bills through behavioural change. Independent modelling by Green Energy Markets indicates that low-income households could face annual bill increases of up to $217, while high-consumption households (often wealthier consumers with large homes and swimming pools) stand to benefit from savings of up to $1,400 annually.[1],[2] This outcome stands in direct contradiction to the National Energy Objective (NEO), particularly the requirement to operate in the long-term interests of consumers with respect to price, safety and the achievement of emissions reduction targets.

Furthermore, the proposal undermines the economic case for distributed storage at precisely the moment the grid requires it most. By dampening the volumetric price signal, higher fixed charges erode the arbitrage value of batteries, extending payback periods and discouraging the deployment of assets that provide critical firming capacity. In its submission to this review, Tesla characterised the fixed charge approach as a "legacy model of passive consumption"[3] rather than the active, dynamic participation seen in leading jurisdictions such as California, Spain and Belgium. These international markets have moved away from blunt fixed charges in favour of sophisticated capacity-based or dynamic pricing that rewards flexibility and peak-shaving.

This report argues that the AEMC should reconsider the direction of travel toward higher static fixed charges. Instead, the Commission should pursue a dual-track reform strategy: implementing high-fidelity capacity pricing (based on kW peak demand, not mere customer existence) to drive system efficiency, while simultaneously establishing a federally harmonised Social Tariff to protect vulnerable consumers from the inevitable costs of the transition. The following sections provide an exhaustive evidentiary basis for this position, drawing on economic theory, distributional impact modelling and international case studies.

2. The Regulatory Context and Economic Theory

2.1 The "Death Spiral" Narrative and the Changing Grid

The AEMC's review is predicated on the concern of a "utility death spiral." As more households install solar and reduce their reliance on grid-supplied energy, the volume of electricity sold (kWh) decreases. However, the costs of maintaining the physical network infrastructure (the poles and wires) remain largely fixed in the short term. The traditional model of recovering these sunk costs through volumetric charges means that as volume drops, the unit price must rise, potentially encouraging further defection and leaving a shrinking pool of consumers, typically those unable to afford solar, to fund the network.[4]

While this narrative highlights a genuine revenue recovery challenge for Distribution Network Service Providers (DNSPs), the Draft Report's direction toward predominantly fixed residual recovery misdiagnoses the driver of future costs. The AEMC's Draft Report recommends "amending the rules to focus network tariff design on efficiency" and proposes that "network tariffs be designed for energy retailers to translate into diverse customer offerings, rather than being passed directly to consumers."[5] We acknowledge these broader objectives. However, the Draft Report's apparent preference for recovering residual costs through fixed charges, as identified by multiple stakeholders including Nexa Advisory,[6] treats the grid as a static asset to be paid off, rather than a dynamic system to be optimised.

2.2 The Fallacy of Fixed Charges as "Cost-Reflective"

A pervasive misunderstanding in tariff design is the conflation of "fixed costs" (historical capital expenditure) with "fixed charges" (a flat fee per customer). While the costs of building the existing network are indeed sunk, the marginal cost of the network, that is, the cost of the next unit of capacity, is driven almost entirely by peak demand.

The physics of the grid dictates that infrastructure must be sized to handle the maximum coincident load, which typically occurs during summer heatwaves or extreme winter evenings. A consumer who draws a continuous 1 kW load places a fundamentally different stress on the grid than a consumer who draws 10 kW for one hour during a peak event. A static daily fixed charge ($/day) fails to distinguish between these two behaviours. It sends a price signal of zero for marginal capacity usage.

By recovering a larger portion of revenue through fixed charges, the regulatory framework effectively states that a customer's impact on the grid is constant and inevitable. This removes the financial incentive for:

- **Peak shaving:** Reducing consumption during critical windows.
- **Load shifting:** Moving consumption to times of high solar generation.
- **Energy efficiency:** Investing in thermal shell improvements or efficient appliances.

If the variable component of the tariff is suppressed to accommodate a higher fixed charge, the return on investment for efficiency measures collapses. Passive consumption is effectively subsidised, encouraging wasteful usage during peak times because the marginal cost of that usage has been artificially lowered.[3]

2.3 Ramsey Pricing in the Modern Era

The AEMC's approach echoes the economic principle of Ramsey Pricing, which suggests that fixed costs should be recovered from the most price-inelastic components of demand to minimise distortion. Historically, grid access was considered highly inelastic: households would not disconnect regardless of the fixed fee.

However, the elasticity landscape has shifted. The demand for grid-supplied energy is now substantially more elastic due to the availability of substitutes (rooftop solar). Furthermore, while full grid defection remains expensive, high fixed charges improve the economics of standalone power systems (SAPS) for peri-urban and regional consumers. If the fixed charge becomes too high, it creates a tipping point where wealthier consumers exit the grid entirely, precipitating the very death spiral the policy aims to prevent.[4]

Moreover, Ramsey pricing is widely criticised in modern welfare economics for its equity implications. Low-income households face significant capital constraints that limit their ability to invest in substitutes such as solar panels or batteries, even where the long-term economic case may be favourable. They are therefore disproportionately exposed to fixed charges they cannot avoid. Applying Ramsey principles in this context often results in regressive outcomes where the poor pay a higher proportion of system costs relative to their income. The Draft Report's direction appears to prioritise the revenue stability of monopoly networks over the allocative efficiency of the broader market.

3. Distributional Impact Analysis: Winners and Losers

The most critical concern with the Draft Report's direction is its distributional impact. Far from "evening out the ledger," a shift to high fixed charges constitutes a significant wealth transfer from low-income and energy-efficient households to high-income, high-consumption households.

3.1 The Burden on Low-Income and Low-Usage Households

Energy consumption is strongly correlated with dwelling size, appliance stock and household occupancy, all factors that serve as proxies for income. Low-income households often reside in smaller dwellings (apartments, units) or are single-person households (pensioners), resulting in below-average grid consumption.

Under a high fixed charge regime, these households are penalised. A fixed charge acts as a regressive poll tax. For a household with a total annual bill of $800, a $500 fixed component represents 62% of their costs. For a household with a $4,000 bill, that same fixed charge represents only 12.5%.

Modelling results: Independent analysis by Green Energy Markets highlights the severe impact on vulnerable groups.[1],[2] The modelling compares the current tariff structure against a structure where variable rates are lowered and fixed rates are raised to recover the same total revenue.

- **Endeavour Energy Network (NSW):** Low-income households face an annual bill increase of $127.
- **SA Power Networks (South Australia):** Low-income households face an annual bill increase of $217.

These increases occur because the "savings" from lower volumetric rates are negligible for households that consume very little power. They cannot consume enough to offset the hike in the daily supply charge. This outcome directly harms the "energy poor" purportedly being protected, creating a barrier to essential services.

3.2 The Penalty on Solar and Battery Investors

The AEMC argues that solar owners are currently cross-subsidised by non-solar owners. We acknowledge this concern warrants examination. However, a shift to high fixed charges over-corrects, becoming a punitive measure against those who have invested in the transition.

- **The "Solar Penalty":** A household with an 8 kW PV system and a 20 kWh battery effectively operates as a micro-utility, providing its own energy and often exporting during the day. Their reliance on the grid for energy import is minimal.
- **Financial impact:** Green Energy Markets modelling suggests these households could see annual bill increases of $400 to $700.[2]
- **Mechanism:** Because these households have virtually zero grid imports, they derive zero benefit from the reduction in variable charges. They are hit with the full weight of the increased fixed charge, which cannot be avoided through behavioural change or technology.
- **Trust and sovereign risk:** Solar Citizens notes that such a change devalues the investments made by millions of Australians in good faith.[7] Retroactively changing the tariff structure to claw back the value of solar investments creates a perception of sovereign risk, discouraging future participation in CER programs.

3.3 The Windfall for High-Consumption Users

The mathematically inevitable consequence of revenue-neutral tariff rebalancing is that if low-usage customers pay more, high-usage customers must pay less. The AEMC may characterise the current arrangement as a cross-subsidy from non-solar to solar households. However, the proposed remedy creates a new and arguably more problematic cross-subsidy: from low-usage, low-income households to high-usage, high-income households.

Profile of the beneficiary:

- Large detached dwelling.
- Central heating and cooling (HVAC) running without zone control.

- Heated swimming pool.
- Multiple electric vehicles (EVs) charging without smart management.

Modelling results:

- **United Energy (VIC):** High-income, high-consumption households save $791 annually.
- **SA Power Networks (South Australia):** High-income households save $1,401 annually.[2]

By flattening the tariff, fixed charge recovery effectively subsidises the marginal consumption of these households. The cost of running a pool pump or charging an EV at 6:00 PM is reduced, socialising the network stress caused by this discretionary consumption across the entire customer base, including pensioners and renters.

3.4 Summary of Distributional Impacts

Household Type	Characteristics	Annual Financial Impact	Driver of Outcome
Low Income / Vulnerable	Low usage, renter, no CER	+$127 to +$217 (Loss)	Fixed charge hike outweighs minor variable savings
Solar + Battery Owner	High self-sufficiency, minimal import	+$400 to +$700 (Loss)	Cannot avoid fixed charge; variable savings are zero
Median Household	Average usage, standard appliances	Neutral / Slight Loss	Dependent on specific tariff balance
High Income / High Use	Large home, pool, unmanaged EV	–$791 to –$1,400 (Gain)	Massive benefit from reduced volumetric rates on high volume

4. Impact on the Clean Energy Transition and CER

The Australian government has committed to ambitious decarbonisation targets, with the NEM reaching 82% renewable energy by 2030. Achieving this requires the active coordination of gigawatts of distributed storage. The Draft Report’s pricing direction actively undermines this national strategic goal.

4.1 Eroding the Business Case for Batteries

Batteries are arbitrage machines. Their economic viability depends on the existence of a price differential: charging when energy is cheap (during the solar sponge or off-peak periods) and discharging when energy is expensive (at peak).

- **Flattening the curve:** By shifting cost recovery to fixed charges, the variable peak rate is inevitably lowered. This compresses the spread between peak and off-peak prices.
- **ROI destruction:** If the peak network charge drops from 30 c/kWh to 15 c/kWh, the savings generated by a battery discharging during the peak are halved. This significantly extends the payback period for residential storage.

- **Grid consequence:** At a time when AEMO's Integrated System Plan calls for a massive scale-up in distributed storage to firm the grid, a pricing framework that dismantles the investment case risks stalling battery deployment, leaving the grid exposed to the "solar duck curve," where minimum demand issues during the day and ramping constraints in the evening threaten system security.

4.2 Stifling Innovation and Flexibility

Tesla's submission to this review characterises the fixed charge approach as a "legacy model of passive consumption" that acts as a barrier to innovation.[3]

- **The passive signal:** A fixed charge tells the consumer: "It does not matter what you do."
- **The active signal:** A dynamic or capacity-based tariff tells the consumer: "If you help the grid, you save money."

Innovators such as Tesla, Amber Electric and various Virtual Power Plant (VPP) operators rely on price volatility to create value. They use software to automate household loads, shifting consumption to soak up excess solar and curtailing usage during peaks. High fixed charges numb these signals. If a consumer pays an $800 annual access fee regardless of their behaviour, the marginal incentive to sign up for a VPP or install a smart EV charger is drastically reduced.

4.3 Conflicting Policy Signals

The proposed direction creates a contradictory policy environment:

- **Federal Government:** Offers rebates for batteries (e.g. Solar Sharer Offer, Community Battery programs) to encourage uptake.
- **State Governments:** Offer zero-interest loans for solar and battery systems.
- **AEMC direction (if adopted):** Increases fixed charges, reducing the operating savings of these same systems.

This incoherence wastes taxpayer money. Subsidising the capital cost of a battery while simultaneously reducing its operational yield through tariff design is inefficient policy. The regulatory framework must align with the broader decarbonisation objectives, not work against them.

5. International Best Practice: A Comparative Analysis

While the Draft Report's direction favours static fixed charges for residual cost recovery, comparable international jurisdictions are moving towards greater sophistication, using high-fidelity data from smart meters to implement tariffs that are both cost-reflective and conducive to CER adoption.

5.1 California: The Net Billing Tariff (NEM 3.0)

California shares Australia's high solar penetration and "duck curve" challenges. In its major tariff reform of 2022/2023 (NEM 3.0), the regulator explicitly grappled with the issue of fixed charges versus volumetric signals.

- **Rejection of large solar-specific fixed charges:** Utilities proposed substantial "Grid Participation Charges" of approximately $56/month for a typical 7 kW solar system. Following intense public opposition and gubernatorial intervention, the CPUC dramatically reduced this charge in the final decision, settling on a much smaller Grid Participation Charge of approximately $14–$16/month. While a residual fixed charge remains, the CPUC explicitly chose not to impose the large discriminatory fixed fees that utilities sought.[8]

- **The "Avoided Cost" mechanism:** Instead of relying on fixed charges for cost recovery, California adopted a "Net Billing" structure where exports are credited at the utility's "Avoided Cost," a value that changes hour by hour. Exports during the solar glut (mid-day) earn near zero, while exports during periods of grid stress can earn substantially higher rates.[8]
- **Battery incentive:** This structure makes standalone solar less attractive but makes solar-plus-battery highly lucrative. It compels the solar fleet to evolve from passive generation to active dispatch.
- **Contrast:** California addressed the cost-recovery and equity challenge by aligning compensation with value. The AEMC's direction attempts to address it by imposing fixed charges that ignore value entirely.

5.2 Spain: The 2.0TD Tariff Structure

In June 2021, Spain overhauled its network tariffs for all low-voltage consumers (up to 15 kW contracted power) through CNMC Circular 3/2020 and Royal Decree 148/2021, introducing the unified 2.0TD structure.[9] This model demonstrates how to recover fixed costs without resorting to a flat per-customer fee.

- **Dual capacity terms (power):** The tariff includes two separate capacity charges (€/kW/day) based on contracted power: one for the peak/mid-peak period (weekdays 08:00–00:00) and one for the off-peak/valley period (weekdays 00:00–08:00, plus all weekends and public holidays).
- **User choice:** Consumers can contract different levels of capacity for different times. An EV owner might contract 3 kW for the day (to keep costs low) but 7 kW for the night (to charge their car).
- **Efficiency signal:** This recovers "fixed" revenue based on the capacity the user requires from the grid, not merely their existence. It maintains a strong incentive for efficiency: if a user can lower their peak demand, they pay less. A flat fixed charge lacks this nuance, charging the same fee to a studio apartment as to a sprawling mansion.

5.3 Flanders (Belgium): The Capacity Tariff

Flanders introduced a dedicated Capacity Tariff in January 2023, widely regarded as a leading example of cost-reflective pricing in a digital grid.[10]

- **The mechanism:** Network costs are recovered based on the customer's monthly peak demand (kW), measured in 15-minute intervals.
- **The calculation:** Each month, the digital meter records the single highest quarter-hour of usage. The annual billing peak is then calculated as the average of the last 12 monthly peaks (with a minimum floor of 2.5 kW for households with analog meters).
- **Behavioural incentive:** This directly targets the driver of grid augmentation. It encourages "peak shaving." A consumer is incentivised to run their dishwasher after their EV has finished charging, or to charge their EV at 4 kW over six hours rather than 11 kW over two hours.

- **Equity:** Unlike a flat fixed charge, the capacity tariff is equitable. A low-income pensioner with few appliances will naturally have a low peak and pay the minimum. A wealthy user with high simultaneous loads pays significantly more.
- **Enabling technology:** This model relies on digital meters, which Australia is already rolling out. There is no technical barrier to adopting this superior model in the NEM.

5.4 Hawaii: Smart Renewable Energy Export

Hawaii, having the highest solar penetration in the US, has moved to the Smart Renewable Energy (SRE) program.[11]

- **Shift and save:** The default tariff is a Time-of-Use (TOU) model that heavily penalises evening usage and rewards daytime usage.
- **Export credits:** As in California, export credits are time-variable.
- **Legacy transition:** Hawaii transitions customers from legacy Net Metering to the new smart tariffs after seven years, ensuring a smoother adjustment than the abrupt imposition of high fixed charges.

6. Alternative Policy Mechanisms

Critique must be accompanied by constructive alternatives. The goals of revenue sufficiency and equity can be achieved through mechanisms that do not distort the efficiency of the market.

6.1 The Social Tariff: A Targeted Solution for Equity

The Draft Report's direction attempts to use tariff design as a blunt instrument for social policy. By flattening tariffs for everyone to assist the "energy poor," it risks destroying efficiency for the entire market. A far superior approach is to separate social protection from market design.

Proposal: A National Social Tariff.

- **Concept:** A dedicated tariff offer available exclusively to eligible concession card holders, job seekers and those experiencing hardship.
- **Structure:** This tariff would have zero or very low fixed charges and a discounted variable rate for a "survival block" of energy (e.g. the first 1,000 kWh per quarter).
- **Advocacy:** The Victorian Council of Social Service (VCOSS), the Australian Council of Social Service (ACOSS) and the Brotherhood of St Laurence (BSL) have extensively advocated for this model.[12] They argue that the Victorian Default Offer (VDO) and similar safety nets are insufficient because they are still based on the costs of an unaffordable market.
- **Funding:** The cost of the Social Tariff should be funded through consolidated revenue (taxation) or a broad-based industry levy, recognising that energy poverty is a social welfare issue, not a grid physics issue. We acknowledge that general revenue expenditure sits outside the AEMC's remit; however, the Commission is well-placed to formally advise Energy Ministers on this matter.
- **UK precedent:** The UK House of Commons Energy Security and Net Zero Committee, in its October 2025 report *Tackling the Energy Cost Crisis* (HC 736), examined options for a social tariff

funded in part by energy company revenues, concluding that existing price caps alone are insufficient to protect vulnerable consumers.[13]

Implementing a Social Tariff allows the AEMC to pursue efficient, cost-reflective pricing (such as capacity tariffs) for the general population and CER owners, confident that vulnerable consumers are shielded by a dedicated safety net.

6.2 Dynamic Operating Envelopes (DOEs)

The AEMC is concerned about congestion caused by solar exports. Fixed charges do not solve congestion. Dynamic Operating Envelopes do.

- **Mechanism:** DNSPs send real-time signals to customer inverters, defining the export limit (kW) for the next five-minute interval based on actual local grid voltage and thermal constraints.
- **Efficiency:** This maximises the utilisation of the grid. Instead of a static 5 kW export limit (or a financial penalty), a customer might be allowed to export 10 kW on a cool day and 0 kW during a local voltage spike.
- **State of play:** SA Power Networks and Energy Queensland are already trialling and rolling out DOEs. The regulatory framework should build on this technical solution rather than rely on the blunt instrument of fixed charges.

6.3 Critical Peak Pricing (CPP)

If the goal is to reduce peak demand to lower future network costs, Critical Peak Pricing is the most effective tool.

- **Mechanism:** A very high price signal (e.g. $15/kWh) is sent during the top 40 to 50 hours of grid stress per year.
- **Response:** This sends a clear "emergency" signal to batteries and smart appliances to shed load.
- **Fairness:** Unlike a fixed charge, which is paid every day regardless of grid conditions, CPP is paid only when the user is actually contributing to system stress.

7. Conclusions and Recommendations

7.1 Synthesis of Findings

The evidence presented in this submission demonstrates that the Draft Report's direction toward increased fixed network charges is a retrograde step that ignores the capabilities of the modern digital grid.

1. It is regressive: It transfers wealth from low-income to high-income households, increasing bills for low-income households by up to $217 per year while delivering $1,400 in savings to high-consumption users.

2. It is anti-transition: It erodes the arbitrage value of community and household batteries, slowing the storage deployment required for the 82% renewable target.

3. It is inefficient: A fixed charge sends no marginal price signal. It subsidises passive, unmanaged consumption and penalises efficiency.

4. It is an outlier: Global leaders such as Belgium and Spain are moving to capacity-based (kW) pricing, while California is moving to dynamic value-based billing. Australia would be alone in retreating to static fixed fees.

7.2 Recommendations

Recommendation 1: Reject the Shift to High Fixed Charges

The AEMC should remove the direction toward increasing the fixed component of network tariffs from the Final Report. The Commission should acknowledge that fixed charges are a poor proxy for cost-reflectivity in a capacity-constrained system.

Recommendation 2: Endorse Capacity Tariffs (kW) over Fixed Charges ($/day)

The Commission should signal a long-term transition towards capacity-based network pricing (similar to the Flanders model) which rewards peak shaving and load flexibility. This aligns the financial incentive of the consumer with the physical constraints of the network.

Recommendation 3: Champion a National Social Tariff

The AEMC should formally advise the Energy Ministers Meeting that tariff reform must be accompanied by the introduction of a federally harmonised Social Tariff. This is the only equitable way to protect vulnerable consumers without distorting the price signals necessary for system efficiency.

Recommendation 4: Align Incentives with Federal Policy

The pricing framework must be harmonised with the Capacity Investment Scheme and the Small-scale Renewable Energy Scheme. Regulatory pricing should amplify, not dampen, the signals to invest in storage and flexibility.

Recommendation 5: Grandfather Existing CER Investments

To preserve consumer trust and avoid sovereign risk, any significant tariff restructuring must include grandfathering provisions (e.g. 10 years) for households that have already invested in solar and batteries based on the previous tariff regime, similar to the approach taken in California and Hawaii. The costs of such transitional provisions should be transparently allocated and recovered from the broader customer base through efficient pricing mechanisms, recognising that honouring regulatory commitments is essential to maintaining the investor confidence required for future CER deployment.

The “consumer-driven future” envisioned by the AEMC cannot be built on a tariff structure that treats consumers as passive revenue units. It must be built on a structure that empowers them to become active partners in the grid. We urge the Commission to reconsider its draft findings in light of this evidence.

End of Submission.

Submitted by Victoria Energy Future Network, www.vefn.au

Works Cited

1. Green Energy Markets, Household Hourly Energy Use, Solar and Battery Payback Model, as reported in "Solar and battery households will be biggest losers from network tariff changes, advocates say," Renew Economy, accessed 12 February 2026, https://reneweconomy.com.au/solar-and-battery-households-will-be-biggest-losers-from-network-tariff-changes-advocates-say/

2. Green Energy Markets, Household Hourly Energy Use, Solar and Battery Payback Model, as reported in "Consumers face five-fold hike in network charges under regulator plan to take from the poor, and give to the rich," Renew Economy, accessed 12 February 2026, https://reneweconomy.com.au/plan-to-increase-fixed-network-costs-will-take-from-the-poor-give-to-the-rich-and-slash-returns-on-pv-and-batteries/

3. Tesla, Submission to the AEMC Pricing Review EPR0097, 28 August 2024, available at https://www.aemc.gov.au/market-reviews-advice/pricing-review-electricity-pricing-consumer-driven-future

4. "The economic consequences of electricity tariff design in a renewable energy era," ResearchGate, accessed 12 February 2026, https://www.researchgate.net/publication/342642069_The_economic_consequences_of_electricity_tariff_design_in_a_renewable_energy_era

5. AEMC, The Pricing Review: Electricity Pricing for a Consumer-Driven Future, Draft Report, 11 December 2025, https://www.aemc.gov.au/sites/default/files/2025-12/Pricing%20review%20draft%20report%20%283%29.pdf

6. Nexa Advisory, Submission to the AEMC Pricing Review Draft Report (EPR0097), February 2026, https://nexaadvisory.com.au/web/wp-content/uploads/2026/02/Nexa-Advisory-submission-AEMC-Pricing-Review-Draft-Report.pdf

7. "Electricity Pricing Review – beware of increases to fixed network charges," PV Magazine Australia, accessed 12 February 2026, https://www.pv-magazine-australia.com/press-releases/electricity-pricing-review-beware-of-increases-to-fixed-network-charges/

8. "CPUC Modernizes Solar Tariff To Support Reliability and Decarbonization," CPUC, accessed 12 February 2026, https://www.cpuc.ca.gov/news-and-updates/all-news/cpuc-modernizes-solar-tariff-to-support-reliability-and-decarbonization; see also OpenSolar, "Understanding California's NEM 3.0 (Latest Modifications)," https://support.opensolar.com/hc/en-us/articles/6037827371919

9. CNMC Circular 3/2020 and Royal Decree 148/2021; see also Red Eléctrica de España, "Red Eléctrica publishes the electricity prices of the new tariff for small consumers," 31 May 2021, https://www.ree.es/en/press-office/news/press-release/2021/05/red-electrica-publishes-electricity-prices-new-tariff-for-small-consumers; Iberdrola, "Helping you to understand your electricity tariff," https://www.iberdrola.es/en/electricity/tolls

10. "Everything about the new Flemish capacity tariff," Blink Charging, accessed 12 February 2026, https://support.blinkcharging.be/vragen/everything-about-the-new-flemish-capacity-tariff/; see also Flanders.be, "The capacity tariff," https://www.vlaanderen.be/en/moving-housing-and-energy/the-capacity-tariff

11. "Smart Renewable Energy Export," Hawaiian Electric, accessed 12 February 2026, https://www.hawaiianelectric.com/products-and-services/smart-renewable-energy-programs/smart-renewable-energy-export

12. "VCOSS joint submission responding to Request for Comment Paper," VCOSS, accessed 12 February 2026, https://vcoss.org.au/wp-content/uploads/2025/12/VCOSS-submission_VDO-26-27-review-request-for-comment_FINAL-1.pdf

13. UK House of Commons Energy Security and Net Zero Committee, "Tackling the energy cost crisis," HC 736, 5th Report, 29 October 2025, https://publications.parliament.uk/pa/cm5901/cmselect/cmesnz/736/report.html