

13<sup>th</sup> February 2026

AEMC  
 Level 15  
 60 Castlereagh Street  
 Sydney NSW 2000

**AEMC Proposal to shift network charges**

I would strongly urge the AEMC to abandon its proposal to shift network charges away from being tied to power demand to instead become largely fixed.

This should be abandoned for the following reasons:

- It will hurt lower income households who on average tend to consume less energy than high income householders.

Network	Household archetype	Annual kWh	Current Tariff Structure		AEMC Proposal		Loss/Gain	Result
			Retail variable	Network fixed	Retail variable	Network Fixed		
Ausgrid	Low income, small home	4,039	\$1,218	\$222	\$832	\$787	-\$178	Worse off
Ausgrid	Median household	5,039	\$1,520	\$222	\$1,038	\$787	-\$82	Worse off
Ausgrid	High income, large house, 2 Teslas	12,927	\$3,978	\$222	\$2,621	\$787	\$792	Better off
Endeavour	Low income, small home	4,039	\$1,252	\$240	\$798	\$821	-\$127	Worse off
Endeavour	Median household	5,039	\$1,562	\$240	\$995	\$821	-\$15	Worse off
Endeavour	High income, large house, 2 Teslas	12,927	\$4,080	\$240	\$2,527	\$821	\$972	Better off
Energex	Low income, small home	4,005	\$1,223	\$208	\$870	\$724	-\$163	Worse off
Energex	Median household	5,005	\$1,528	\$208	\$1,087	\$724	-\$75	Worse off
Energex	High income, large house, 2 Teslas	12,894	\$4,106	\$208	\$2,749	\$724	\$841	Better off
United	Low income, small home	3,078	\$730	\$115	\$441	\$584	-\$179	Worse off
United	Median household	4,078	\$968	\$115	\$584	\$584	-\$85	Worse off
United	High income, large house, 2 Teslas	11,966	\$2,963	\$115	\$1,703	\$584	\$791	Better off
Powercor	Low income, small home	3,078	\$745	\$165	\$428	\$686	-\$204	Worse off
Powercor	Median household	4,078	\$988	\$165	\$568	\$686	-\$101	Worse off
Powercor	High income, large house, 2 Teslas	11,966	\$3,027	\$165	\$1,649	\$686	\$857	Better off
SAPN	Low income, small home	3,191	\$1,249	\$248	\$771	\$943	-\$217	Worse off
SAPN	Median household	4,191	\$1,640	\$248	\$1,013	\$943	-\$67	Worse off
SAPN	High income, large house, 2 Teslas	12,080	\$5,161	\$248	\$3,065	\$943	\$1,401	Better off

- It will undermine efforts to cost-effectively decarbonise our energy system (which is contrary to one aspect of the energy market objective which the AEMC is obliged to address) by

substantially reducing the financial incentive for consumers to adopt energy efficiency measures as well as solar and batteries.

- It creates the risk of requiring substantial extra, unnecessary, costly investment in new supply capacity in both generation and networks. Decarbonisation of the energy system will require increased reliance on renewable energy and electrification of household heating loads and transport.
- The increased reliance on renewable energy (particularly solar) when it intersects with increased reliance on electricity for heat poses challenges for ensuring reliable winter supply of electricity at reasonable cost. This makes it very important that electrification involves using highly energy efficient options and sensible timing of their use. Your proposal will send completely the wrong signal to householders about undertaking electrification in an energy efficient manner. In addition, electric vehicle charging represents a very large new electricity load. Households need to see a clear and long-lived incentive to undertake charging outside the evening peak otherwise it will lead to a blow out in network costs.
- It will do nothing to address renters lack of access to the financial benefits of electrification, energy efficiency and solar and batteries which is a product of the split- incentive problem afflicting the Tennant-Landlord relationship. Your implied suggestion that electricity retailers will roll-out these technologies to renters via subscription models illustrates a laughable lack of understanding of the credit risks involved in rolling out long-lived fixed equipment to renters who are non-permanent residents of a residential premise.
- Lastly your suggestion that we introduce highly variable dynamic network tariffs only once a network area is close to its capacity limits fails to appreciate the nature of household energy usage behaviours and a naïve understanding of how electricity networks respond to financial incentives within the regulatory framework.

Networks will likely only introduce these tariffs at a minute to midnight before the network needs upgrading because they don't actually want to avoid upgrades and would prefer to grow their asset base so as to milk what are excessively generous weighted average cost of capital allowances that the AER seems happy to repeatedly grant them.

These dynamic tariffs will almost undoubtedly come too late for households to effectively change their energy-using equipment and learn new behaviours. Household energy usage is a product of often long-lived energy using equipment and embedded behaviours that can take quite some time and sustained incentives to change.

In addition, a sudden and highly geographically isolated introduction of dynamic tariffs will likely lead many households to be taken by surprise such that they end up with a rude shock when they get their electricity bills. This could be especially bad for the vulnerable households you profess to care about.

Yours faithfully

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