

21 May 2024



Queensland Competition Authority
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Dear Sir / Madam

Bundaberg Regional Irrigators Group (BRIG) has reviewed the Draft Determination prepared by QCA on the Regulated retail electricity prices in regional Queensland for 2024 – 25 and does not have any specific comments associated with the determination.

Whilst we acknowledge that the N component that QCA adopts is a pass through determined via the AER approved network price process and technically outside the scope of your investigations, we would like to draw your attention to the impact that the Daily Service Fixed Charge has on a cohort of our members that are classified as Standard Asset Large Customers as defined in the table below which has been copied from the current Ergon Network Tariff Guide.

Tariff class	Eligibility criteria
Standard Asset Customers (SAC)	<p>All customers connected at LV with installed capacity up to 1,000kVA are assigned to the SAC tariff class. SAC customers are further classified as Small or Large customers, depending on their energy consumption:</p> <ul style="list-style-type: none"> • SAC Small – A small customer is defined in the National Energy Retail Law (Queensland) Act 2014 as an LV customer with annual energy consumption up to 100 MWh. • SAC Large – A large customer is defined as an LV customer with annual energy consumption greater than that of a small customer as determined in Section 7 of the <i>National Energy Retail Regulations</i>, that is customers with annual energy consumption of 100 MWh or more.
Connection Asset Customers (CAC) ^a	<p>Customers with a network coupling point at 66 kV, 33 kV, 22 kV, 11 kV and installed capacity above 1,000 kVA who are not assigned to the ICC tariff class are allocated to the CAC tariff class.</p>
Individually Calculated Customers (ICC)	<p>Customers are assigned to the ICC tariff class if they are coupled to the network at 132 kV, 110 kV, 66 kV or 33 kV, and with installed capacity above 10 MVA.</p> <p>Customers may also be assigned to the ICC tariff class if they are coupled to the network at 132 kV, 110 kV, 66kV or 33 kV, and with installed capacity below 10 MVA where:</p> <ul style="list-style-type: none"> • A customer has a dedicated distribution system which is quite different and separate from the remainder of our distribution system • At the determination of the DNSP, the nature of the customer's connection to the network, and/or usage of the network, make average prices inappropriate • A customer is connected at or close to a Transmission Connection Point, or • Subject to the Policy set out in our TSS Appendix A, eligible CAC customers accessing transitional or obsolete retail tariffs and who can demonstrate that they are facing extraordinary customer impact post retirement of the retail tariffs and that this financial impact is directly attributable to their network charges.

This cohort has an annual energy consumption of less than 160 MWh on an annual basis and in the case of Tariff 60 A (Large business flat rate interruptible supply Primary tariff) is levied a fixed charge of \$43.90353 per day (\$16,037 per annum).

This fixed charge is the same regardless of annual energy consumption, for example a customer using 5,000 MWh also pays the same charge.

It is our understanding that the use of Load Control tariffs can be extremely beneficial to the sustainable operation of the network and as such beneficial to all ERGON network customers in times of high demand.

We would appreciate QCA's advice on how we may address the way this cost impacts on desired price signals for the uptake of potentially mutually beneficial tariff options.

Please call should you require further information or clarification.

A handwritten signature in black ink, appearing to read 'D. Holliss', with a stylized, scribbled flourish to the right.

Dale Holliss
Director / Secretary
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