

**From:** [Andrew Bowen](#)  
**To:** [AERresets2024-29](#)

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Hello

This is my first submission to the AER.

I am writing to you to express my concerns with the lack of consultation in Tasnetworks R24-29 reset process, particularly the Tariff structure statement.

TN has led the narrative talking about the benefits of TOU tariffs and how the AER would like to see cost reflective tariffs and continually pushing back stating that is what the AER is requiring, always stating customers could revert back to flat rate tariffs if it better suited their lifestyle.

This Tariff Structure statement is the first we have heard about the flat rate tariffs, for retail customers, T31 and T41, becoming obsolete as at 1/7/2024. This document was submitted 30-11-2023 to the AER.

[5431d22e0385ae8c490d77240b3bf9a8\\_TasNetworks-Revised\\_Proposal-Tariff\\_Structure\\_Statement-Nov\\_2023-Public.pdf \(amazonaws.com\)](#)

I represent Electrical contractors on the Tasnetworks Customer Council and have three major concerns over this change.

- 1/ Lack of time to educate my cohort on the changes that need to occur in their work practices.
- 2/ Total lack of consultation with the public at large, to inform, so they can minimise bill shock!
- 3/ All this being said I am writing to you within a 6-month window, to effect any change if at all! I am afraid the ship has sailed!

Historically, T41, soon to be obsolete, was called Hydroheat tariff and introduced in the nineties. It was designed to encourage high consumption electric heating (space or water) over the dominant form of heating which was wood. It has been one of the most effective levers to reduce the amount of wood heaters in Tasmania and facilitating the transition to electric heating. It has put consumers on the electric heating hook so to speak and now they are on they are about to be gouged. Essentially another tax on working mums and dads which is bad family financial outcome, let alone the environmental and health community outcomes if we see a resurgence of wood heaters again, as the jump in domestic power bills makes electric heating untenable for the family budget. If electricity becomes too expensive and gas already is too expensive then wood heating becomes a viable contender again. Tasnetworks in previous names, Aurora and Hydro have had a heating off-demand tariff T61 which is also, now obsolete. Whereby storage / in slab heating could take advantage of the cheaper of peak rates. The retailer/DNSP actively encouraged customers to move away from T61 to the new Hydroheat tariff, for it better suited their lifestyle and the heat was available instantaneously, when returning home after being out of the premises for a period of time. Whilst customers could revert back to storage style heating, more suited to TOU tariff's, it is not impossible, it will be expensive, and not palatable during a cost-of-living crisis.

My solution is to establish a flat rate Heating tariff, maybe load limited to say 10KW, if that is acceptable to all parties.

Or alternatively delay obsoleting these tariffs to the next reset period, consult with whole of industry about TN objectives and bring the relevant stakeholder to the table, to pave the way forward, as this is what I would have thought the consultation process would have looked like this time.

This should not alter TN's reset proposal. As by their own admissions TOU will not cost the community it is more cost reflective. If TN claims that they need this rule change, then they have been leading the narrative again to their own advantage.

Many people will be affected by the changes, elderly, vulnerable working mums and dads. A large amount of the community that are on fixed incomes.

This is a statement from one of my colleagues around this reset process.

This is as much to do with the AER guidelines as it is to do with TasNetworks. But improvements are needed to bring consumer impacts front and centre in the process and not leave them as an after thought which is now the case.

Whilst the engagement during this R24-29 period has improved over the last one, there is much work to be done.

Some one from the AER stated during one of our meetings " the purpose of customer groups being involved in the reset process, was to place downward price pressure on monopoly DNSP's. I feel that I have failed my cohort in that.

As previously stated, I feel that I am doing too little too late and I have missed the boat in influencing a better outcome for the wider Tasmanian community.

I am frustrated that TN has only dealt community groups the hands that they wanted us to see! I could go on and on about the negatives to this issue, but that doesn't help the result, this process is about engagement not exclusion.

If you could see fit to ask TN to impose a reprieve to the deleting of these tariffs until an amicable solution is reached for all parties, including the environment.

Regards

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