



# Default market offer 2026-27

## Draft Determination

13 April 2026

Justice and Equity Centre  
ABN 77 002 773 524  
[www.jec.org.au](http://www.jec.org.au)

Gadigal Country  
Level 5, 175 Liverpool St  
Sydney NSW 2000  
Phone + 61 2 8898 6500  
Email [contact@jec.org.au](mailto:contact@jec.org.au)



## About the Justice and Equity Centre

The Justice and Equity Centre is a leading, independent law and policy centre. Established in 1982 as the Public Interest Advocacy Centre (PIAC), we work with people and communities who are marginalised and facing disadvantage.

The Centre tackles injustice and inequality through:

- legal advice and representation, specialising in test cases and strategic casework;
- research, analysis and policy development; and
- advocacy for systems change to deliver social justice.

## Energy and Water Justice

Our Energy and Water Justice work improves regulation and policy so all people can access the sustainable, dependable and affordable energy and water they need. We ensure consumer protections improve equity and limit disadvantage and support communities to play a meaningful role in decision-making. We help to accelerate a transition away from fossil fuels that also improves outcomes for people. We work collaboratively with community and consumer groups across the country, and our work receives input from a community-based reference group whose members include:

- Affiliated Residential Park Residents Association NSW;
- Anglicare;
- Combined Pensioners and Superannuants Association of NSW;
- Energy and Water Ombudsman NSW;
- Ethnic Communities Council NSW;
- Financial Counsellors Association of NSW;
- NSW Council of Social Service;
- Physical Disability Council of NSW;
- St Vincent de Paul Society of NSW;
- Salvation Army;
- Tenants Union NSW; and
- The Sydney Alliance.

### Contact

Kira van Os  
The Justice and Equity Centre  
Level 5, 175 Liverpool St  
Sydney NSW 2000

T: +61 2 8898 6500  
E: [kvanos@jec.org.au](mailto:kvanos@jec.org.au)

Website: [www.jec.org.au](http://www.jec.org.au)

The Justice and Equity Centre office is located on the land of the Gadigal of the Eora Nation.

## **Australian Council of Social Service**

The Australian Council of Social Service is a national advocate supporting people affected by poverty, disadvantage and inequality, and the peak council for community services nationally.

**Contents**

- Recommendations.....2**
- 1. Introduction .....4**
- 2. A principled approach to the determination.....4**
- 3. Wholesale costs .....5**
- 4. Network costs.....7**
- 5. Retail costs & retail margin .....7**
  - 5.1 Retail costs to serve a standing offer customer..... 8
  - 5.2 A truly efficient retail margin..... 9
- 6. Tariff design.....9**
  - 6.1 Principled apportionment of fixed and variable costs .....9
  - 6.2 A fair Solar Sharer Offer..... 10
- 7. Further engagement and resources ..... 12**

# Recommendations

---

## **Recommendation 1**

*That the AER ensures its methodology for determining each aspect of the DMO is optimally aligned with the new objective. As part of this, the Final Determination should transparently articulate how the AER has applied the DMO's new objective in each aspect of its decision and what changes have been made to better reflect the objective.*

---

## **Recommendation 2**

*That the method to determine wholesale energy costs adopt the 50<sup>th</sup> percentile estimate, without including a volatility allowance.*

---

## **Recommendation 3**

*That the AER continues to use a data-driven approach to determining wholesale energy costs, to avoid over-compensating retailers based on recent price volatility and speculation.*

---

## **Recommendation 4**

*That the AER maintain its approach to use the lowest cost network tariff to determine efficient network costs. To ensure network costs are allocated efficiently, it should undertake more analysis to inform a principled approach to allocating network charges as fixed and variable costs.*

---

## **Recommendation 5**

*That costs to acquire and retain customers not be explicitly allowed for, be set to zero or be materially reduced, to reflect the fact this expenditure provides no benefit to standing offer customers.*

---

## **Recommendation 6**

*That the retail margin be set at an optimally efficient level which does not incorporate existing inefficiencies in the retail market. The starting point should be 5%, with clear demonstration why any higher level is efficient and reasonable.*

---

## **Recommendation 7**

*That tariffs be determined according to consistent principles, by allocating fixed costs to daily supply charges and variable costs to usage charges, to ensure transparency and efficiency of cost recovery and provide a transparent and 'objective' comparison for other retail offers.*

---

## **Recommendation 8**

*That the Solar Sharer Offer be set 'conservatively' recognising the information gaps and the need to mitigate risks in initial implementation. Practicality should be prioritised, with a starting*

*assumption of no load shift, state-specific free usage periods and unavoidable costs recovered in other usage periods. The AER should explicitly identify areas where future decisions will iterate on the basis of improved data and evidence on which to base assumptions and modelling.*

***Recommendation 9***

---

*That the AER nominate areas for further data required to iterate future SSOs and collect comprehensive data to monitor uptake and outcomes of the SSO at a consumer- and system-level, and report on these transparently.*

# 1. Introduction

The Justice and Equity Centre (JEC) and the Australian Council of Social Service (ACOSS) welcome the opportunity to respond to the Australian Energy Regulator's (AER) draft determination for the 2026-27 Default Market Offer (DMO).

Our organisations strongly support robust default pricing and have long advocated for reforms to the DMO to ensure it meaningfully contributes to better outcomes for all consumers.<sup>1</sup> In this context we welcome the renewed objective and the AER's genuine efforts to reform its methodology to reflect this new objective and purpose.

We commend the AER's interpretation of the reformed purpose and objectives of the DMO, and support the direction outlined in the draft determination. The Draft broadly reflects the intent of the reformed DMO and its updated objectives.

While we detail a range of recommendations for refinement of the AER's approach, we support the direction and recognise it as setting an appropriate long-term foundation for future DMO determinations clearly focussed on promoting and protecting the consumer interest.

Where we see this determination as being unable to fully implement measures which best promote the consumer interest – for instance in relation to the SSO – we encourage the AER to take an approach which mitigates risk to consumers, while actively identifying areas where future determinations will need to iterate and respond to improved information.

In the context of the transition, consumers face increasing difficulty in engaging with the energy market. The need for a fair and trusted default offer, and the role it plays in shaping a market which works better for consumers, has only increased, particularly as cost-of-living pressures escalate for households. Embedding a robust, principled approach to setting the DMO, informed by an unambiguously consumer-focussed objective, is more important to consumers than ever.

## 2. A principled approach to the determination

We commend the AER for the approach outlined in the draft and the clearly demonstrated intent to reflect the updated objectives.

The amended DMO purpose and objectives require a clear focus on better outcomes for consumers and this is broadly evidenced in the draft. However, there are a range of areas where further changes would better reflect the objective and considerations.

As the first under the new objectives, this determination sets the interpretations and intent for future determinations. This requires the AER to consider how each aspect of the final methodology and approach best implements the stated objective. While we have highlighted areas where we consider further action is required in the following sections of this submission, it

---

<sup>1</sup> The final section of this submission details our engagement with the default market offer and associated consultations to date.

would be valuable for the AER to clearly articulate how the proposed approaches best reflect the new objective as part of its final decision.

It is also necessary to consider the clarified role of the DMO and how this may influence the interpretation of consumers best interests and good consumer outcomes. The DMO is no longer a loose 'safety net', but more an accessible 'fair' offer with the capacity for genuine influence on the market. The renewed focus on efficiency has the potential to reshape retailer competition, the general 'efficiency' of market offers and how consumers understand the value of retail offers. This does not mean that the DMO must be cheaper than all market offers, but it does require the AER to ensure it is carefully determined to reflect only truly essential, efficient costs.

The DMO should not be set to reflect all the costs of all retailers, only efficient costs, and should unequivocally not accommodate inefficient costs. In this context, we caution against any assumptions that actual examined costs incurred by retailers are inherently efficient because they are assumed to be exposed to competitive dynamics. Strong evidence exists to reject any assumption that competition is an effective discipline on retail costs or behaviour, or meaningful in delivering consistent outcomes for consumers.<sup>2</sup> Where possible, we encourage the AER to interrogate costs reported by retailers to ensure its determinations do not bake in existing inefficiencies, but retain or enhance incentives for retailers to compete meaningfully and seek further efficiencies in their costs.

The DMO also plays an important role in facilitating continued access to the simple 'fair' offer which is increasingly recognised as necessary and desirable in a complex and confusing energy market environment. More complex and/or innovative offers should be accommodated in the retail market but these offers can only truly be trusted and valued by consumers where a fair, reasonable and trusted offer is guaranteed and available as a consistent reference.

### ***Recommendation 1***

---

*That the AER ensures its methodology for determining each aspect of the DMO is optimally aligned with the new objective. As part of this, the Final Determination should transparently articulate how the AER has applied the DMO's new objective in each aspect of its decision and what changes have been made to better reflect the objective.*

## **3. Wholesale costs**

We support the use of the 50<sup>th</sup> percentile wholesale energy cost (WEC) to reflect the requirement to consider only efficient costs to supply an essential service. This should not include a volatility allowance.

The use of the 50<sup>th</sup> percentile WEC is a welcome shift from previous DMO methodologies which have consistently over-recovered WEC. The "even" division of wholesale cost risk between consumers and retailers reflects a more reasonable modelling assumption. In practice however,

---

<sup>2</sup> For example see ACCC, 2025, [Inquiry into the National Electricity Market, December 2025](#), p 20; AEMC, 2025, [Draft report: the pricing review](#), pp 57-58; CHOICE, 2025, [The Power of Confusion](#), pp 3-7.

retailers are much better placed to manage wholesale market risk, with strong information asymmetries present between retailers and consumers.

While we understand retailers are required to assume and manage some risk in their wholesale costs, the draft method proposed for determining the wholesale costs component appears to mitigate retailers' risk at the expense of efficiency more than is necessary. The AER's assumptions and methods for determining wholesale costs should reflect the efficient decisions of a prudent retailer in its management of risk, and therefore not include unnecessary risk premiums. Retailers have a range of means to mitigate, manage and defray wholesale costs and manage wholesale risk and this should be reflected in the balance the AER strikes.

We disagree with assertions that possible increases in uncertainty and risk in the wholesale market warrant a higher WEC percentile estimate.<sup>3</sup> It is unreasonable to expect a prudent and efficient hedging strategy to eliminate risk in all eventualities. Increasing WEC in response to unquantified risks is not in the long-term interests of consumers. Based on this, it is not appropriate to adopt a volatility allowance in the WEC estimate. The increase in WEC arising from including a volatility allowance pushes wholesale risk back onto consumers relative to the 50<sup>th</sup> percentile WEC, undoing the intent of setting the lower percentile. Given the back-cast analysis indicated that over-recovery is still likely at the 50<sup>th</sup> percentile WEC in most cases, it is not efficient or reasonable to further increase the probability of over-recovery.

### ***Recommendation 2***

---

*That the method to determine wholesale energy costs adopt the 50<sup>th</sup> percentile estimate, without including a volatility allowance.*

We understand the current circumstances in the Middle East have introduced an additional aspect of uncertainty. However, we caution the AER not to unnecessarily respond to short-term volatility and speculation, but take a pragmatic, data-driven approach to incorporating any demonstrated impacts of the Middle East conflict on wholesale costs. While indications of short-term increases in forward contract prices have created significant public speculation on price impacts, there is as yet insufficient evidence to show whether or how this will be realised, or the long-term materiality of any impacts. Given that there is currently still significant uncertainty, adjustments to the WEC estimation methodology in response to this uncertainty are not justified.

### ***Recommendation 3***

---

*That the AER continues to use a data-driven approach to determining wholesale energy costs, to avoid over-compensating retailers based on recent price volatility and speculation.*

---

<sup>3</sup> AER, 2026, [Draft determination - Default market offer 2026-27](#), p 35.

## 4. Network costs

We agree that the lowest applicable network tariff for each respective network is the most appropriate estimation of efficient network costs. Determining the DMO tariff to reflect this cost mitigates the risk of over-recovery.

It is not necessary for retail prices to structurally reflect the underlying network tariff. Doing so would assert a determinative role for network tariffs on retail offers which is neither necessary nor desirable.

However, we are concerned the AER has oversimplified the relationship between retail tariffs and network tariffs to some degree. We recommend the AER more closely examine its principles to allocate fixed and variable network costs, to ensure efficient allocation. Retailers should not necessarily “recover network charges in the same manner they are incurred”<sup>4</sup>, but rather play a more sophisticated role in managing network costs risks (while still recovering efficient costs) in line with one of their fundamental purposes - to package costs and risks into a choice of products consumers value. An approach which does not reflect this nuance risks further entrenching current practices of shifting network costs (and risks) onto consumers without any mitigation, which undermines the role and value of retailers in a way which is not in the long-term interest of consumers.

### ***Recommendation 4***

---

*That the AER maintain its approach to use the lowest cost network tariff to determine efficient network costs. To ensure network costs are allocated efficiently, it should undertake more analysis to inform a principled approach to allocating network charges as fixed and variable costs.*

## 5. Retail costs & retail margin

We welcome the material changes to the approach in setting retail costs and margin and the clearly demonstrated intent that they be set efficiently.

However, the current approach for determining retail costs and the retail margin continues to overcompensate retailers, assuming and baking in the cost of current, inefficient practices.

Basing these components purely on revealed costs relies on the (false) assumption the retail market is meaningfully competitive and that retail costs are efficient as a result of ‘being exposed’ to these competitive dynamics. Recent AER analysis found material differences between median and lowest offers,<sup>5</sup> beyond the price dispersion we would expect to see in a genuine market where all costs were exposed to genuinely competitive pressures. Retailers are still able to recover excess costs and margin from some (or most) customers as a result of market opacity,

---

<sup>4</sup> AER, 2026, [Draft determination - Default market offer 2026-27](#), p 61.

<sup>5</sup> AER, 2026, [Quarterly retail performance update October - December 2025](#), p 9.

complexity of retail offers, and the fundamental flaws of the current retail market. Assessments of efficient retail costs and margin should reflect this.

Further, we strongly disagree that the DMO must be set at a level to prevent any retail exit. Any meaningfully competitive market should involve market entry and exit. The limited market exits in recent years is an indicator that competition is not a strong driver of efficiency for retail costs and that current costs and margins may be too high to encourage meaningful competition.

It is not in the long-term interests of consumers to entrench current market inefficiency in the DMO determination. The AER has an opportunity to set the DMO not only to ensure impacted consumers pay no more than efficient costs, but to set a market benchmark which can help drive more effective retail competition and retail cost efficiency more broadly.

## **5.1 Retail costs to serve a standing offer customer**

We welcome the methodological changes and the clear demonstrated intent to reflect only efficient retail costs in line with the renewed DMO objective. This is broadly evident in the approach to setting cost to serve and bad debt costs. However, fundamental inefficiencies remain. In particular we consider the approach to costs related to acquisition and retention activities flawed, with no demonstration that any specific allowance for these costs is necessary or efficient, or that standing offer customers incur or benefit from these costs. In particular we highlight:

- The 3% of standing offer consumers who switched to market offers in Q1 2025-26 reflect an insignificant proportion of all standing offer consumers, raising the question of the benefit of acquisition costs to them.
- It is not reasonable to assume that retailers meaningfully compete (as we have noted earlier), that retention and acquisition activities are an efficient part of this competition, or that the end result of this brings overall prices down or benefits most consumers generally – that is, acquisition costs which result in benefit to a small group of ‘acquired consumers’ are not beneficial to all other consumers who carry the cost of that activity.
- It is not clear at what point higher acquisition and retention costs incurred by smaller retailers simply become inefficient – for instance, on the basis they impair the business by acquiring loss-making customers.

Based on this – and the range of issues we have raised across previous submissions, in relation to customer acquisition and retention costs - we consider there is no need to explicitly allow for acquisition and retention costs, and no evidence to support determining “modest acquisition and retention costs” as being above zero. If a non-zero amount were to be determined, we would expect this amount to be materially smaller than the observed standing offer customer-weighted average cost estimate. For example, a “modest” amount could be determined by calculating 25% of the observed average.

## **Recommendation 5**

---

*That costs to acquire and retain customers not be explicitly allowed for, be set to zero or be materially reduced, to reflect the fact this expenditure provides no benefit to standing offer customers.*

### **5.2 A truly efficient retail margin**

We support the significant changes in approach to determining retail margin, both in setting a single margin for residential and small business consumers, and in materially reducing the overall allowed margin. This is a welcome demonstration of the intent of the updated objective and, given the removal of the reasonable profit principle, aligned with more efficient retail margins.

We note there is no evidence to indicate retail margins set at the lowest reasonable level would be inefficient or lead to unreasonable retail exit, particularly given the example provided by Victorian Default Offer.

We don't see compelling evidence supporting the chosen retail margin, which is higher than jurisdictions' regulated retail margins.<sup>6</sup> While we note different contexts may reasonably give rise to different margins, this can also be a result of different (or poorer) competitive dynamics in certain regions. In any case we consider data from South Australia and South-East Queensland too variable to determine a static point-in-time estimate. More stable data estimates trend closer to 5%.<sup>7</sup> It is reasonable for this to be the starting point for the AERs final determination, with any deviation from this clearly demonstrated and explained.

We recommend the AER consider further reductions to the allowed retail margin.

## **Recommendation 6**

---

*That the retail margin be set at an optimally efficient level which does not incorporate existing inefficiencies in the retail market. The starting point should be 5%, with clear demonstration why any higher level is efficient and reasonable.*

## **6. Tariff design**

### **6.1 Principled apportionment of fixed and variable costs**

We support a principled approach to cost-apportionment and the proposal to apportion fixed costs to daily supply charges and variable costs to usage charges. This is the most accurate and equitable approach and supports the transparency which enables the DMO to be a more effective reference for retail offer comparison. We do not support any manipulation of the charges to shift the recovery of cost components from the daily supply charge to the usage charge.

We consider manually shifting costs – as in any of the alternative proposals in the consultation paper - would contradict the new objective and intent of the DMO. It would introduce an 'arbitrary'

---

<sup>6</sup> AER, 2026, [Draft determination - Default market offer 2026-27](#), p 99.

<sup>7</sup> ACCC, 2024, [Inquiry into the NEM report December 2024, Appendix C](#)

aspect undermining the DMOs' utility for consumers. It would dilute the role of the DMO to provide a fair and trusted indication of efficient costs – this includes categories of costs.

For example – providing an objective indicator of efficient 'fixed' costs through the DMO helps support consumer understanding that offers with higher or lower fixed costs are either providing more or less stability for them. They are then more able to understand that alternative offers make costs more or less amenable to their control of bills by reducing usage. This enables better assessment as to whether an offer is better or worse for them depending on their preferences.

Any 'artificial manipulation' of charges, shifting costs between the daily supply charge and the usage charge simply changes which type of customer is most impacted by the change, while undermining the value of the DMO as an objective comparator

### **Recommendation 7**

---

*That tariffs be determined according to consistent principles, by allocating fixed costs to daily supply charges and variable costs to usage charges, to ensure transparency and efficiency of cost recovery and provide a transparent and 'objective' comparison for other retail offers.*

## **6.2 A fair Solar Sharer Offer**

We broadly support the AER's approach to the Solar Sharer Offer (SSO) and the apparent decision to prioritise practicality in developing the offer in its first iteration. The settings of the SSO should aim to ensure it delivers savings to those who best stand to benefit, mitigating risks and costs to other consumers, with safeguards to protect those for whom the offer is not appropriate.

The 'conservative approach' is appropriate for the first SSO, particularly in an environment where necessary data is not available to inform more nuanced decision-making. We recommend the AER explicitly identify areas where future SSO's will iterate based on further data, and nominate which data will be material to future decisions. This year's SSO provides an effective foundation which can be adjusted in future determination once it becomes clearer how consumers take up the offer, respond to price signals, and how its intent can best be delivered.

### **6.2.1 Load shifting assumptions**

We support an approach which assumes no shifted load. It is inappropriate to set this first SSO based on unverified assumptions about expected behaviour change. There is no robust basis to assume how much load consumers can and will shift, with risks involved in over or underestimating. The assumption of no load shift is therefore appropriate.

### **6.2.2 Cost re-apportionment**

We support reappportioning unavoidable costs incurred during the free usage period to variable charges across other periods. We reiterate that only unavoidable costs should be reappportioned. It would be highly counter-productive to shift any costs incurred during the free usage period into the fixed charge, as this weakens price signals and would need to make assumptions about usage which are likely to be inaccurate.

### **6.2.3 Regional variation of free-periods**

We support applying free usage periods which vary by region. We consider this the most appropriate and most likely to maximise intended benefits of the SSO. The optimal time to set the free usage period is highly dependent on local factors, which aligns with the government's recommended design principles of alignment to local conditions and consideration of key market factors. Differences between networks mean that the system benefit of the SSO would likely be significantly reduced if a uniform time was adopted. Further, differences in time zones between the states in the NEM mean regional variations are necessary to account for physical differences in conditions.

### ***Recommendation 8***

---

*That the Solar Sharer Offer be set 'conservatively' recognising the information gaps and the need to mitigate risks in initial implementation. Practicality should be prioritised, with a starting assumption of no load shift, state-specific free usage periods and unavoidable costs recovered in other usage periods. The AER should explicitly identify areas where future decisions will iterate on the basis of improved data and evidence on which to base assumptions and modelling.*

#### **6.2.4 The interaction between controlled loads and the Solar Sharer Offer**

More analysis is needed to determine the interaction between controlled load and the SSO. Regardless of the final position, this may be best identified as an explicit area where more data is required and where future iteration will occur.

The paper implies consumers with controlled load would be eligible for the SSO,<sup>8</sup> but does not offer further detail on how the SSO could apply to consumers who currently have controlled loads.

Some networks already operate controlled load during the likely SSO free usage periods.<sup>9</sup> However, this does not guarantee that consumers will capture the intended benefits of the SSO. There is an important distinction between controlled load windows merely coinciding with the SSO period, and retailers actively ensuring controlled loads are scheduled and cycled during that window for customers on an SSO. Where controlled load is not actively aligned with the SSO window, consumers may miss out on assumed bill savings compared to a scenario where controlled load is incorporated into general consumption under an SSO tariff. That is, controlled load customers may actually be left worse off.

Without explicit guidance or regulatory direction, there is a risk retailers will manage controlled load in a way which primarily serves their own operational or wholesale hedging objectives, rather than maximising benefits for consumers on the SSO. This is already often the case. This risk is particularly acute given consumers typically have limited visibility or control over how and when controlled loads are operated.

We encourage the AER to explore options for consumers who currently have controlled load to access potential benefits from the SSO. This should include consideration of explicit requirements, incentives, or disclosure obligations to govern how retailers manage controlled

---

<sup>8</sup> AER, 2026, [Draft determination - Default market offer 2026-27](#), p 19.

<sup>9</sup> Energy Australia, [Controlled load](#), accessed 7 April 2026

loads during periods overlapping with SSO windows, as well as an assessment of the relative benefits and incentives of different implementation options to ensure consumers are not left worse off.

### **6.2.5 Monitoring outcomes to develop future Solar Sharer Offer determinations**

We recommend the AER specifically identify areas where more data is needed to further iterate the SSO, as well as setting out criteria to monitor and report on the impact of the SSO against key criteria relevant to its objectives. At a minimum the AER should collect data from retailers and networks enabling it to report on:

- **Behaviour change**  
Specifically changes in consumption patterns and differences in consumption patterns between SSO customers and other comparable consumers, and the system-level demand impacts of these changes.
- **Bill savings**  
Actual bill savings of SSO customers compared to their estimated bill on a DMO tariff (both flat and TOU) and the proportion of consumers on the SSO with a deemed better offer. This should also include numbers of customers shifting off an SSO offer – on the assumption this is because it does not deliver value.
- **Wholesale market shifts**  
The frequency and materiality of negative wholesale price events (compared to previous years), and frequency of misalignment between free usage periods and wholesale pricing.
- **Equity**  
The types of consumers accessing and benefiting from the SSO (e.g. by network/region, concession/rebate status, payment difficulty status, and usage/bill amount), instances of potential cross-subsidisation from other offers.

We would welcome further clarity in the final determination on the timing and strategy for the SSO post-implementation review.

#### ***Recommendation 9***

---

*That the AER nominate areas for further data required to iterate future SSOs and collect comprehensive data to monitor uptake and outcomes of the SSO at a consumer- and system-level, and report on these transparently.*

## **7. Further engagement and resources**

We would welcome the opportunity to further discuss these matters with the AER and other relevant stakeholders. Please contact Kira van Os ([kvanos@jec.org.au](mailto:kvanos@jec.org.au)) to arrange any follow-up.

The JEC (previously the Public Interest Advocacy Centre) and ACROSS have been consumer stakeholders in DMO engagement processes since its inception. The below list of resources

provides further background into our long-held and evolving positions on the DMO as enduring consumer advocates on DMO policy.

## **DMO 8**

- [JEC submission to DMO 8 Issues paper](#)
- [JEC, ACOSS, QCOSS and SACOSS submission to Solar Sharer Consultation Paper](#)

## **DMO review**

- [JEC, ACOSS, Combined Pensioners & Superannuants Association, Energetic Communities and SACOSS Joint Submission to DCCEEW Consultation Paper](#)

## **DMO 7**

- [JEC, ACOSS, QCOSS and SACOSS Joint Submission to DMO 7 Draft Determination](#)
- [JEC, ACOSS and SACOSS Joint Submission to DMO 7 Issues Paper](#)

## **DMO 6**

- [JEC, ACOSS and SACOSS Joint Submission to DMO 6 Draft Determination](#)
- [JEC and SACOSS Joint Submission to DMO 6 Net System Load Profile Approach](#)
- [JEC, ACOSS and SACOSS Joint Submission to DMO 6 Issues Paper](#)

## **DMO 5**

- [JEC Submission to DMO 5 Draft Determination](#)
- [JEC Submission to DMO 5 Issues Paper](#)

## **DMO 4**

- [JEC Submission to AER Options Paper: Methodology for DMO 4](#)

## **DMO 3**

- [JEC Submission to AER Position Paper DMO 3](#)

## **DMO 2**

- [JEC Submission to DMO 2 Draft Determination](#)
- [JEC Submission to DMO 2 Position Paper on DMO 2 price setting](#)

## **DMO 1**

- [JEC Submission to DMO 1 Draft Determination](#)
- [JEC submission to AER Position Paper on developing a DMO for the electricity retail sector](#)