



Part of Energy Queensland

22 May 2026

Ms Kami Kaur  
Executive General Manager, Network Regulation  
Australian Energy Regulator  
By email: [REDACTED]

**Application to Amend the Energex and Ergon Energy Network 2025-30 Tariff Structure Statements – withdrawal of Residential and Small business Flexible Load Tariffs and Optional Demand Tariffs**

**Submitted under NER clause 6.18.1B**

Dear Ms Kaur

Energex and Ergon Energy Network (together, Energy Queensland Limited or EQL) submit this application to amend the approved Tariff Structure Statements (TSS) for the 2025–30 regulatory control period, in accordance with clause 6.18.1B of the National Electricity Rules (NER).

This application seeks approval to remove the requirement to introduce the following tariffs:

- Optional Residential and Small Business Demand Tariffs, scheduled to commence from 1 July 2027, and
- Optional Residential and Small Business Flexible Load Tariffs, scheduled to commence from 1 July 2028.

The need for these amendments arises from events that:

- occurred after the Australian Energy Regulator's (AER's) 2025-30 Final Decision
- were outside EQL's reasonable control, and
- could not reasonably have been foreseen at the time the TSS were approved.

**Summary of key drivers**

- Progress of the Australian Energy Market Commission's Pricing Review, since TSS approval, indicates that static, non-locational demand tariffs for small customers are unlikely to form part of the National Electricity Market (NEM) long-term pricing framework. Further, the uptake of EQL's existing optional residential and small business demand tariffs has remained low since the AER's 2025-30 Final Decision which introduced default Time of Use Energy Tariffs, indicating a limited level of customer engagement with demand-based pricing structures.

- Detailed post AER approval design work identified a fundamental incompatibility between the intended meter-less Flexible Load Tariffs and mandatory NEM settlement and metering requirements.

If the TSS is not amended:

- EQL, retailers and customers would incur costs and disruption to introduce tariffs that would likely become obsolete shortly after introduction (Optional Demand tariffs), and
- EQL and retailers would be required to implement tariffs that cannot be operationalised within existing market systems (Flexible Load Tariffs).

These outcomes would be inefficient, inconsistent with the pricing principles in NER clause 6.18.5, and contrary to the long-term interests of customers.

### Supporting material

In accordance with clause 6.18.1B(b) of the NER, EQL has provided a detailed application for amendment in Attachment 1, which addresses:

- the events triggering the amendment
- why those events were beyond EQL's reasonable control
- why the events could not reasonably have been foreseen
- differences between the current and proposed TSS
- impacts on other elements of the TSS
- how the amendment improves compliance with NER clause 6.18.5, and
- stakeholder engagement undertaken.

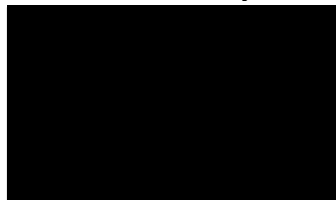
Marked-up versions of the amended TSS are provided in:

- Attachment 2 – Energex TSS (marked-up), and
- Attachment 3 – Ergon Energy Network TSS (marked-up).

EQL considers both amendments necessary to ensure continued compliance with the NER and to align tariff development with system capability, efficient pricing principles and emerging national reforms. We therefore request the AER's approval under clause 6.18.1B.

If you require any further information, please contact Trudy Fraser, General Manager Regulation on [REDACTED] or email [REDACTED]

Yours sincerely



Benn Barr  
Executive General Manager, Regulation, Risk and Strategy  
Energy Queensland