Dear Mr Anderson,

While I welcome the proposed general reductions in the network tariff rates for both Ergon and Energex for the 2020-2025 period I remain concerned at the relatively high daily charges for the demand tariffs for SAC large NMIs in the Ergon area which as you can see from the tables below for Ergon Eastern Division tier 1 are significantly higher than the equivalent Energex network tariff charges. Also the STOUD tariffs in the Ergon area will be billed on kW whereas the others will be billed on kVA making it more difficult to compare total costs apples with total cost apples.

In my view the overall consultation process needed an improvement in the Quality Assurance applied because of the errors which my surveillance systems detected in the tables of indicative demand charges and residential case studies and the complete omission in the June 2019 TSS statement regarding the network cents per kWh energy rates for the unmetered street lights in the Energex area proposed to be applied for 2020-2025 period.

ERGON AREA NETWORK TARIFFS - Eastern Division T1				
Large Business	Component type	DUOS 2020-21	Units	
Demand small NTC is EDST Eastern Division T1	Daily Access charge	31.940	\$ per day	
	Demand charge kW	23.779	\$ / kW / month	
	Demand charge kVA	21.401	\$ / kVA / month	
	Volume charge	0.303	cents per kWh	
Demand medium NTC is EDMT Eastern Division T1	Daily Access charge	113.282	\$ per day	
	Demand charge kW	18.711	\$ / kW / month	
	Demand charge kVA	16.840	\$ / kVA / month	
	Volume charge	0.30300	cents per kWh	
Demand large NTC is EDLT Eastern Division T1	Daily Access charge	299.281	\$ per day	
	Demand charge kW	15.190	\$ / kW / month	
	Demand charge kVA	13.671	\$ / kVA / month	
	Volume charge	0.303	cents per kWh	
Time of Use Demand NTC TOUD NEW Eastern Division T1	Daily Access charge	147.267	\$ per day	
	Demand - Peak kW	N#A	\$ / kW / month	
	Excess kW Off Peak	N#A	\$ / kW / month	
	Demand - Peak kVA	11.865	\$ / kVA / month	
	Excess kVA Off Peak	2.373	\$ / kVA / month	
	Volume charge	0.606	cents per kWh	
Seasonal TOU Demand NTC STOUD Eastern Division T1	Daily Access charge	25.650	\$ per day	
	Demand - Peak kW	62.025	\$ / kW / month	
	Demand - Off Peak kW	9.024	\$ / kW / month	
	Demand - Peak kVA	Not Supplied	\$ / kVA / month	
	Demand - Off Peak kVA	Not Supplied	\$ / kVA / month	
	Volume - Peak	0.0000	cents per kWh	
	Volume - Off Peak	2.116	cents per kWh	

ENERGEX AREA NETWORK TARIFFS				
Large Business	Component type	DUOS 2020-21	Units	
Demand small NTC 8300	Daily Access charge	3.587	\$ per day	
	Demand charge	12.009	\$ / kVA / month	
	Volume charge	0.371	cents per kWh	
Demand large NTC 8100	Daily Access charge	29.558	\$ per day	
	Demand charge	10.427	\$ / kVA / month	
	Volume charge	0.556	cents per kWh	
Demand TOU low voltage NTC 7200	Daily Access charge	4.572	\$ per day	
	Demand charge	9.192	\$ / kVA / month	
	Excess demand	1.838	\$ / kVA / month	
	Volume charge	1.612	cents per kWh	

Regards

## Mick Fullelove

Category Manager - Energy Peak Services m p e