Justice and Equity Centre

acoss

qcoss

SACOSS

Joint submission: Solar Sharer Offer Consultation paper 2025-26

28 November 2025

Justice and Equity Centre
ABN 77 002 773 524
www.jec.org.au

Gadigal Country
Level 5, 175 Liverpool St
Sydney NSW 2000
Phone + 61 2 8898 6500
Email 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

Website: 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.

Queensland Council of Social Service

QCOSS is Queensland's peak body for the social service sector. Our vision is to achieve equality, opportunity, and wellbeing for all Queenslanders.

South Australian Council of Social Service

The South Australian Council of Social Service is the peak representative body for the non-government community, social and health sectors.

Contents

Recommendations

Recommendation 1

That the Department adjust and re-focus the objectives for the Solar Sharer Offer, to better target it and more accurately reflect the contribution it can make. Accordingly, the SSO should:

1. *Provide a trusted and fair Free Power Period Time of Use Offer (FPPTOU) all consumers can access, and which serves as a comparison for other FPP and TOU offers.*

2. *Support consistent community understanding that electricity is generally more available and cheaper in the middle of the day.*

3. *Contribute to more efficient demand and the efficient use of renewable generation when it is abundant.*

Recommendation 2

That the Department recommend measures, including direct funding programs, to support necessary remediation of meter boards and other connection-point upgrades to help enable more universal and equitable access to smart metering (and scope to take up the SSO)

Recommendation 3

That the Department recommend targeted measures to support electrification, upgraded energy efficiency and access to efficient electric appliances for cohorts of consumers who are disadvantaged and excluded – such as low income households, renters, embedded network residents and social housing residents – to improve equity of access to the potential benefits of the SSO.

Recommendation 4

That SSO tariffs offered by retailers may not exceed the tariff cap and maximum annual price cap determined by the AER under the DMO framework.

Recommendation 5

That the AER consider the following principles when determining the SSO tariff cap:

- *That consumers on an SSO are better off overall.*

- *unavoidable costs incurred during the zero-charge window may be recovered through increased charges in other usage periods.*

- *Costs incurred during the zero-charge window should not be recovered through fixed charges.*

- *Tariff settings outside the free-charge window must be cost-reflective and should not be subject to intentional increases with the purpose of providing stronger price signals.*

- *Costs incurred through the offering of FPP offers should not be shifted to consumers on other offers.*

Recommendation 6

*That the SSO involve setting a wider window within which a 3-hour FPP may be set, with the zero-charge period either able to be set by the retailer **or** set to vary seasonally and between regions.*

Recommendation 7

That introduction of the SSO involve information and consent provisions to inform and protect consumers, including:

- *Standardised information on:*
    - *who is most likely to benefit from an SSO,*
    - *what is required to benefit,*
    - *risks in taking up an offer,*
    - *simple measures to shift usage for material benefit, and*
    - *their rights to opt-out of an SSO offer and how to do so.*

  This should be available to all consumers interested in taking up the SSO and should be accessible and able to meet the diverse needs of consumers.
- *Requiring bill comparisons between their current offer and an SSO to be made on the basis of actual usage without assumed behaviour change.*
- *Ensuring a guaranteed option to switch to a fall-back offer (such as a non-SSO fair-priced standing offer) at any time.*
- *Enabling a consumer to give permission to be automatically switched to a non-SSO standing offer if it would leave them better off. This permission should be accompanied by an option to opt-out within 10 days' of receiving notice of an automatic switch.*

1. Introduction

The Justice and Equity Centre (JEC), Australian Council of Social Service (ACOSS), Queensland Council of Social Service (QCOSS) and South Australian Council of Social Service (SACOSS) welcome the opportunity to respond to the Department of Climate Change, Energy, the Environment and Water's (the Department) Solar Sharer Offer (SSO) Consultation Paper (the Paper).

Our organisations advocate for a more equitable retail energy market, with the benefits and costs of the energy transition shared more fairly. In that context, we support the stated intent for the SSO to promote more equal access to the benefits of solar generation. However, we have a number of concerns about its capacity to deliver on this intent. We are further concerned the proposal introduces a number of significant risks which must be addressed through design of the SSO and supporting measures.

The SSO benefit to improved community understanding

The SSO can be a useful tool in countering long-held assumptions regarding energy use and help build broad community understanding that energy usage costs are generally lowest during the day. It can also support improved understanding among solar households that self-consumption during the day is the best way to consistently benefit from their installation.

However, broad assumptions cannot be applied to design of the SSO. Energy will, increasingly, be more abundant during solar peak periods in the day, but this is not a guarantee. There will still be days and even longer periods where supply is limited. More nuance in messaging and design is required to mitigate the risk of unintended consequences, such as driving up demand at times when supply may not be locally available or plentiful. There are also risks of cross-subsidisation being created by these offers, and risks that those who most need the intended benefits will be least capable of realising them, further exacerbating inequity. These are issues which must be considered and addressed in design of the SSO and supporting measures.

Considering those who will likely be excluded

As proposed it is most likely that households who already have access to CER – such as batteries, electric vehicles, efficient electric appliances and home management systems - stand to benefit most from this type of offer. Conversely, households already experiencing disadvantage – including renters, low-income households and others without solar and efficient electric households – are those least likely to be able to benefit. This is despite the fact they are identified as the intended beneficiaries. There are numerous barriers many of these households face in benefiting as intended from the SSO, including:

- Not having a smart meter, and being unable to upgrade to a smart meter[1];
- Having gas connections (particularly for heating and hot-water), inefficient electric appliances or poor housing efficiency, and not having access to smart management services or schemes

[1] Due to being a renter and not being in control of their metering, residing in an embedded network, or having an installation that requires remediation they cannot afford or are unable to action.

which enable automatic demand shifting, which limits or prevents scope to shift the most significant loads (such as hot water, heating and cooling);

- Residing in an embedded network or an apartment with shared gas hot water and/or gas heating which limits or prevents scope to participate;

- Life circumstances which make active management of energy usage difficult or impossible, due to employment, health conditions, and mental health or disability.

Energy usage for these cohorts is most likely to continue to respond to need and often coincide with more expensive time periods. Not accounting for this and expecting widespread uptake of the SSO risks further impacting those already experiencing disadvantage and taking the focus off ensuring consumers' access to simple and fair energy plans that meet their needs.

Optimising the role of the SSO and avoiding risks to consumers

Given the potential risks involved, we consider the SSO will be most valuable if its focus and objectives are narrowed, with supporting and enabling measures introduced. The SSO should focus on broad messaging and be designed to benefit those with willingness and ability to shift their demand. It should recognise the limited cohort who can participate and benefit and should focus on ensuring against negatively those who cannot.

It should focus on realising its potential to offer both a trusted and fair Free Power Period time of use offer (FPP) for those who want it and be a robust indicative measure of what a fair FPP offer should look like. This can enable more households to take up such offers, with support to understand the benefits and risks relating to their circumstances and ensure it will works for them.

The introduction of an SSO must come with strong 'back-stop' protections to ensure consumers who do not take it up or cannot benefit from it, are not made worse off and still have access to simple, fair and affordable offers which meet their needs.

2. Reframing the SSO's function and objectives

The SSO can play a valuable role delivering certain outcomes, but its objectives as outlined are overstated. They are not necessarily all mutually achievable, and it is not clear how priority will be determined. This presents serious risks to effective design, successful implementation and an appropriate focus on equitable consumer benefit.

In principle, we support initiatives that helps enable more households to benefit from increasingly abundant solar generation, and measures which contribute to more efficient alignment of demand with periods of available, affordable supply. The SSO can help build understanding in the community that electricity is likely to be more abundant and cheaper in the middle of the day. This is broadly a worthy objective.

We also support greater scrutiny of the structure of retail time of use offers, particularly those with FPPs, given the adverse experiences many consumers have with time of use plans, and the lack of trust that market FPPs are actually delivering fair value to consumers. The SSO has an

important objective to build transparency and trust in these offers to make them work better for more consumers.

However, it is not clear how the SSO will deliver its objectives as they are currently framed. Many of the broad assumptions the paper makes about the benefits, take up and impacts of an SSO are poorly justified, exaggerated or overly general and theoretical. By interrogating the function and objectives of the SSO, we intend to offer insights on how its assumptions and objectives can be narrowed and made more robust, how its benefits can be enhanced, and how potential risks can be mitigated.

The Paper seems to assume the SSO will be widely appropriate for 'non solar' consumers and envisages the SSO will have widespread uptake. We are concerned this is an unreasonable assumption which presents risks to the SSO delivering on its intent.

The paper also describes three enablers for the success of the SSO; consumer engagement, technology integration and retailer accountability. These are overly broad and, in some cases, based on problematic assumptions which must be addressed to ensure the objectives and design of the offer – and its enabling measures – consider and address existing inequities to the greatest degree possible:

- **Consumer engagement**
  Improved consumer engagement is not an appropriate or effective enabler for more equitable energy outcomes. Benefit from the SSO and impact on its objectives cannot be reliant on 'consumer engagement' if it is to deliver meaningful, equitable and material benefit and impact. Arguably a more appropriate and contemporary enabler would be policy, regulatory and service reforms which improve access to the benefits of the transition *without* requiring any particular level of active consumer 'engagement' (such as service switching, behaviour change and active usage management).

- **Technology integration**
  Technology will be critical to realising the intended benefit and impact of the SSO, but it must be recognised that access to these technologies is inherently inequitable and without a range of supporting measures - such as support for electrification, support or access to smart meters, efficient electric appliances, batteries and home energy management – an SSO may actually exacerbate existing inequities for the many people who are not able to access these technologies.

- **Retailer accountability**
  Arguably greater retailer accountability and transparency is the most critical enabler, not just to realise the benefits and impact of the SSO, but for an energy market that generally works better for all consumers. Enabling success for the SSO will require ensuring retailer accountability to deliver benefits through the SSO, as well as their other offers to ensure implementation of the SSO delivers benefits to SSO consumers, without transferring costs and impacts to other consumers.

We are concerned that an SSO reliant on these enablers - without taking into account the considerations we have outlined - will mean the assumed benefits and impacts are not achievable at the scale intended, or are simply confined to a limited group of consumers.

2.1 Reframed SSO objectives

The proposed policy objectives for the SSO should be reframed and focussed to clarify priorities and improve the likelihood of success. We contend there are two key areas of values of the SSO which should serve as more focussed objectives:

- Provide a trusted and fair Free Power Period Time of Use Offer (FPPTOU) and a wider reference such offers.

- Support consistent community understanding that electricity is generally more available and cheaper in the middle of the day.

The other objectives presented in the Paper should be reframed as considerations, or at least qualified as objectives to reflect a lesser priority, and recognise that they are heavily contingent upon a range of other factors.

It is important to recognise that there are likely to be many consumers for whom an SSO is not suitable. While we recommend the SSO be implemented with an objective to be fair and effective for those who want to take it up, it is critical this be done without creating unfair cost impacts on those unable to take up the SSO, or unable to benefit from it.

The remainder of this section provides comment on the existing objectives recommended changes.

2.1.1 Engagement is not an appropriate or meaningful outcome

The overarching intent of the policy must be to deliver improved 'benefit from', rather than 'engagement with/in' the transition.

The Department's objective to "engage and empower consumers in the energy transition"[2] is not an appropriate framing as it does not focus on the outcome for consumers. Given the inherent diversity and inequity consumers experience in energy, this focus is likely to result in poorly designed programs which don't work for many consumers and which perpetuate inequities in outcomes realised by consumers.

Challenging assumptions regarding agency and capacity to respond

Most consumers – even those who may have solar panels, batteries and other CER - simply need and want energy to available when they need it and affordable at the time they use it.[3] As discussed throughout this submission, many households have limited agency over their energy use and those with more control likely already own CER. Even for many households assumed to be 'engaged in the transition' – such as those with solar panels – there is often limited capacity or desire to actively control their energy use.

---

2 Department of Climate Change, Energy, the Environment and Water, 2025, Solar Sharer Offer Consultation Paper 2025-26, p 23.

3 Energy Consumers Australia, 2025, Consumer knowledge of electricity pricing and responsiveness to price signals

Many households are unable to get a good outcome in the retail energy market due to competing priorities or pre-existing vulnerabilities. There are also many cohorts of consumers face barriers in accessing, understanding and acting on the information required to enable effective load shifting through active behaviour change, for example people with disability or people from culturally and linguistically diverse (CALD) communities.[4]

A program design which makes assumptions about consumer engagement and empowerment, and which aims to improve 'engagement' is inherently flawed and likely to result in poor and inequitable consumer outcomes.

The SSO could provide a fair and trusted free power period time of use offer, but the presence of this offer in the market cannot be predicated on an assumption that all or most consumers can take it up, will respond to price signals and make the active changes required benefit from it. Critically the SSO must not mean that consumers who need simple offers are left worse off. This risks further entrenching the harmful binary of engaged/disengaged consumers, which has compounded disadvantage for those unable to navigate the energy market.[5]

Recognising the limitations of price signals in energy

It is important to note that, energy is an essential service. The implication of this is shown in consumers' experiences of time of use tariffs to date, which has demonstrated that price signals alone have limited scope to meaningfully shift demand as intended. They often simply result in bill-shock and debt, or unhealthy reduction in overall energy use.

The most effective measures to shift demand are those which do not rely on active changes in consumers' day-to-day behaviour (that is, which don't rely on consumer 'engagement'). The most effective measures are those which enable automatic response which shifts usage to more efficient times. This includes enabling large flexible loads (such as hot water heaters, air-conditioners, EV chargers, batteries, pool pumps and home energy management systems) to be managed in response to market and system signals. Access to such energy resources is unequal however, due to cost and living situation barriers[6].

Rather than assuming price signals will drive 'more efficient usage decisions', an optimised SSO implementation would be accompanied by comprehensive measures to support the electrification of household loads, alongside reforms to enable more flexible demand management for households which was not contingent on consumer 'engagement'.

2.1.2 Providing the option of a trusted and fair FPPTOU

As the paper notes, retailers already offer plans with free periods (FPP). However, there is a general perception that the structure of these offers makes it difficult to trust they are delivering genuine value to consumers. The problem is not differences in when these time periods occur, as is suggested by the Paper. The problem is that there is no transparency of the fairness of fixed

---

4 Australian Energy Regulator, 2022, Towards energy equity, p 14; Energy Consumers Australia, 2024, Insights Report: Understanding the diversity of consumers and their experiences of the energy system, pp 3-4.

5 CHOICE, 2025, The Power of Confusion, pp 7-8.

6 Energy Consumers Australia, 2025, Consumer knowledge of electricity pricing and responsiveness to price signals, p 10.

charges or the tariffs outside the FPP window. This results in an inability for consumers to trust that a plan is appropriate and will be beneficial for them.

Distrust resulting from consumer experience of usage tariffs

More broadly, consumer experience of time of use tariffs has been consistently poor. There is a widespread low level of trust and "engagement" with offers of this kind.[7] Research by CHOICE indicates the confusion that customers face in dealing with complex energy retail plans:

"I feel I was tricked into getting a smart meter... my accounts certainly didn't go down, no matter how hard I try to use the power between the nominated time my accounts have continued to rise. I don't know how the electricity companies can get away with paying solar customers so little, and charge so much for their electricity usage in return."

"I determined that I would be better off using a Flat Rate Tariff (FRT). However, AGL refused to put me on a FRT because I had a smart meter and forced me to be on a Time of Use Plan. Technically, putting me on an FRT is a no brainer. It is THEIR policy forcing me, not technical difficulty."[8]

The accelerating rollout of smart metering has seen many consumers automatically placed on time of use plans without their consent, leading to confusion, anger and bill shocks.[9] There is also consistent evidence that retail practices and the structure of time of use offers means consumers are often unable to realise any benefit from shifting or managing their usage on time of use offers in the market. IPART found that in 2023-24 a typical customer on a time of use offer in NSW could save significantly more by simply switching plans than they could save by shifting 50% of their peak usage to off-peak times.[10] It also found that some retailers had more than 90% of their time of use customers in the Ausgrid network paying annual prices equal to or more than the DMO at the time.[11]

These are critical experiences and demonstrate the potential value of an SSO in ensuring value for consumers is transparent and actually realised. This should be a priority objective for the design and implementation of the SSO and accompanying reforms and protections.

However, it is critical to recognise that even a well-structured and robust SSO will not be suitable for all consumers, and a significant proportion of consumers will be 'excluded'. Rather than attempting to 'maximise uptake' and build an offer which leaves many consumers worse off, it may be better to focus the design objectives of the SSO on being effective for those who are genuinely well-placed to shift their demand.

The second, more critical aspect of the objective should then be to prevent any negative impacts on those consumers unable to take up or benefit from the SSO.

---

7 CHOICE, 2025, Retailers using smart meters to increase energy bills; ABC, 2024, Energy companies under fire over move to 'punishing' time-of-use tariffs

8 CHOICE, 2025, Submission to Better Energy Consumer Experiences consultation, p 4.

9 SACOSS, 2024, Annual SACOSS Briefing to the Minister for Energy, pp 37-38.

10 IPART, 2024, Monitoring the NSW retail electricity market 2023-24, p 97.

11 IPART, 2024, Monitoring the NSW retail electricity market 2023-24, p 75.

2.1.3 Appropriately qualifying the contribution of the SSO to smoothed demand

We contend the proposed objective to 'smooth demand' should be heavily qualified, reflecting the fact this outcome is unlikely and heavily contingent on other factors.

The paper describes market and network benefits that, in the paper's own words, rely on "the widespread adoption of the SSO".[12] While we broadly support measures to smooth demand, we don't consider it reasonable to assume an SSO as proposed is capable of effectively doing this, or of doing it without creating a range of other consequences elsewhere.

The impact assumed cannot be achieved without a range of other measures

The presence of this offer in the market alone cannot be assumed to be sufficient to drive change capable of materially flattening the demand profile as intended. Even universal or widespread uptake would have to be accompanied by measures to enable demand to be shifted flexibly and automatically to achieve this. This would involve widespread electrification of large, flexible household loads, improved housing efficiency, wide availability of batteries and home-energy management systems, and a flexible approach to free power periods and demand management. While support implementation of such policies, their impact cannot be assumed. In any case, the objective cannot be realised even with widespread uptake, if households are being assumed to shift their usage simply through behaviour change as the Paper seems to suggest.

Active behaviour change and usage management is not sufficient

Evidence has shown[13] most consumers want simple, transparent and predictable options which enable them to affordably use energy when they need it. Even many consumers with solar panels, batteries and EVs have little interest or capacity to consciously shift their use to free periods. Therefore, it is important to recognise that even those who take up the offer may not significantly (or consistently) shift their demand to the zero-charge window. This needs to be reflected in the assumptions and objectives of the SSO

It is also not guaranteed that retailers will pass through any savings in network costs which may result from shifted peak demand to consumers on other offers. Given this, it's not reasonable to conclude that any system-level savings resulting from demand shift enabled by the SSO will reliably deliver savings to all consumers.

If this is retained as an objective it should be heavily qualified, for instance to focus on 'contributing to smoothed demand'.

2.1.4 Qualifying the contribution to absorption of excess renewable generation

The SSO will help contribute to absorbing 'excess' renewable generation. However, as with impact on demand, this contribution comes with significant caveats and potential risks which must be recognised.

---

12 Department of Climate Change, Energy, the Environment and Water, 2025, Solar Sharer Offer Consultation Paper 2025-26, p 19.

13 Energy Consumers Australia, 2025, Consumer knowledge of electricity pricing and responsiveness to price signals

We have already noted the limitations the SSO has in the materiality of its likely impact on shifted demand. These limitations mean that any impact during periods of excess demand may be meaningful, but unlikely to be material in relation to future levels of renewable generation. Periods of 'minimum system load' - already experienced where renewables constitute around 50% of generation - are likely to far exceed all potential flexible household load, let alone that which can be actively shifted through an SSO. The assumed potential contribution of an SSO to the 'absorption of excess renewable generation' must be adjusted to recognise this.

It is also critical that for any demand shifting to effectively respond to excess renewable generation it must be flexible, rather than fixed as proposed in the Paper. It is important to recognise that solar generation is variable day-to-day and across the year. An SSO implemented as a 'fixed' mechanism in order to 'maximise' impact, risks creating periods of mismatch where periods of solar 'drought' are still accompanied by high daytime demand.

Recommendation 1

That the Department adjust and re-focus the objectives for the Solar Sharer Offer, to better target it and more accurately reflect the contribution it can make. Accordingly, the SSO should:

- *Provide a trusted and fair Free Power Period Time of Use Offer (FPPTOU) all consumers can access, and which serves as a comparison for other FPP and TOU offers.*
- *Support consistent community understanding that electricity is generally more available and cheaper in the middle of the day.*
- *Contribute to more efficient demand and the efficient use of renewable generation when it is abundant.*

2.2 Clarifying who can benefit from the SSO

An SSO offers opportunity for many consumers to benefit, but as we have noted it is critical to recognise who is likely to be excluded. This is not simply a question of equity of access to potential benefits, but also a critical design consideration to help ensure those consumers not able to take up and benefit from an SSO are not left worse off.

We advocate for equitable access to the benefits of the transition. While the Paper also expresses this as an intent for the SSO, we do not consider it likely to realise this intent because it is likely to exclude or not work for those who most need its potential benefit. Assuming the SSO will be taken up widely, including by vulnerable households is setting up both the offer and these households to fail.

2.2.1 Limitations due to smart-meter access

The requirement to have a smart meter installed to access the SSO results in inherent inequities in potential access to the offer. It is estimated that in excess 20% of households will not have a smart meter installed, mostly due to site remediation requirements.[14] These households are more likely to be apartment-dwellers, low-income households, renters and/orthose living in

[14] South Australian Council of Social Service, 2025, Annual SACOSS Briefing to the Minister for Energy, p 17.

regional/remote areas. For some of these households the cost of remediation required to enable smart-meter installation is unaffordable. For others the structure of their housing (including living in embedded networks) prevents installation.

This is a substantial portion of households who may not even be able to access the offer in current conditions. While this may not be an issue to be directly addressed by the design of the offer, it is important in considering potential impacts of costs shifted from SSO consumers to others, and how to avoid this leaving already disadvantaged consumers worse off. This is particularly relevant because these are the 'non solar' households the offer was broadly intended to benefit.

Recommendation 2

That the Department recommend measures, including direct funding programs, to support necessary remediation of meter boards and other connection-point upgrades to help enable more universal and equitable access to smart metering (and scope to take up the SSO)

2.2.2 Those excluded by efficiency and appliances

Research by the Institute for Energy Economics and Financial Analysis (IEEFA) shows the greatest peak demand reduction and flexibility benefits can be enjoyed by households living in thermally efficient homes with efficient electric appliances, rooftop solar and a battery that can charge from the grid.[15] Households with a thermally inefficient homes, gas connections and/or inefficient electric appliances have limited (or no) capacity to meaningfully reduce and shift peak demand and benefit from the SSO.

Other than EV chargers and pool pumps, key household demand drivers which are capable of flexibility tend to be heating, cooling and water heating[16]. These also represent some of the costliest appliances to replace with efficient electric alternatives. Existing programs, such as the Home Energy Upgrades Fund, can help overcome these cost barriers but not at the scale required to enable equitable access to the benefits of an SSO. They also do not address barriers for groups such as renters or those living in embedded networks and social housing.

While most people may theoretically be able to shift smaller energy loads such as washers and dryers to the free period, the benefit of doing so is much less significant. It also relies on them being home during the day or having smart appliances. In any case, this limits the potential impact for these households as it relies on direct action or behaviour change by the household which is not dependable or likely to be delivered consistently. How much this offer can include households with only some ability to shift their load depends heavily on the tariff design, in particular ensuring that cost increases outside the free-period are minimised.

A clear and accurate assessment of who is likely to be excluded from or otherwise unable to benefit from the SSO will be a critical consideration for its design, as well as the design of

---

15 Institute for Energy Economics and Financial Analysis, 2025, A focus on homes, not power plants, could halve energy bills, p 23.

16 This is dependent on housing built to a good standard of efficiency.

measures required to ensure that those who benefit from the SSO do not do so at the expense of those excluded.

This process should consider targeted supporting measures for energy efficiency, electrification and appliance upgrades to improve equity of access to, and impact of the SSO.

Recommendation 3

That the Department recommend targeted measures to support electrification, upgraded energy efficiency and access to efficient electric appliances for cohorts of consumers who are disadvantaged and excluded – such as low income households, renters, embedded network residents and social housing residents – to improve equity of access to the potential benefits of the SSO.

3. Risks of proposal

While there are benefits from a well implemented SSO, there are also risks of unintended consequences. We have noted several risks to be managed, either through the design of the offer or other supporting guardrails. If these are not managed, the SSO could leave many consumers worse off, exacerbate inequities in energy outcomes and even impact the energy market. Indeed, we consider there is a risk that widespread uptake of the SSO could actually see outcomes contrary to its objectives.

3.1 Potential for unintended pricing outcomes

We contend the design of the SSO has not adequately accounted for the variability of renewable generation, wholesale electricity prices and demand peaks. We are concerned this creates risks of significant unintended consequences which should be address.

The more “successful” the SSO is in shifting demand into the middle of the day – particularly if a single 3-hour period is defined - the more it risks adversely influencing the wholesale market, creating new network peaks or resulting in a mismatch between demand and available supply during periods of solar ‘drought’.

A “free” period – defined as a single, fixed 3-hour period during the day - that is not able to respond to days where solar is abundant and days where it is not, risks material impacts on wholesale prices during those ‘non-abundant solar’ periods. This is because households would be structurally incentivised to shift their demand into a fixed period where the availability of supply is not similarly ‘fixed’ and dependable. For example, on a winter day there may already be high demand coincident with limited solar generation.

Where there is high demand and low local generation, retailers will be exposed to high wholesale prices. It is unclear how this will influence retailers’ hedging strategies, and what impact this may have on their pricing strategies. It is also necessary to consider the potential for these periods of potential mismatched supply and demand to result in sustained periods of high wholesale costs and what impact this may have on costs passed on to consumers.

With the expected trajectory of electrification, system-wide peak demand will increasingly occur in winter which also typically experiences lower solar outputs. Modelling suggests that over time, supply variations and wholesale prices will vary most on a seasonal basis rather than on an intraday basis.[17] While these pattern variations have not yet emerged, it is a relevant consideration on the appropriateness of SSO in the context of the transition. This creates a potential contradiction in the longer-term where, as more consumers are able to benefit from the SSO – due electrification and likely increase in access to CER - the SSO is increasingly likely to be less aligned with demand management requirements.

As we have noted, it is not guaranteed or necessarily likely that uptake of the SSO will be widespread enough to cause system-wide pricing risks. However, it is relevant to consider the potential for the offer to have adverse consequences. These consequences are inherent to the nature of the offer, but can be mitigated through its design.

3.2 Increased complexity and scope for cross-subsidisation

The most significant risks to consider relate to the increased complexity resulting from introduction of the SSO, and the potential for it to create further inequities through the shifting of costs.

Free power period (FPP) offers require some level of costs to be shifted elsewhere, either to other aspects of the retail offer, or to other consumers. While some level of cost shifting to other aspects of the retail offer – either in the form of higher fixed charges or higher peak or shoulder charges – is reasonable, it is very difficult to determine what level of increase is ‘fair’. This is, nonetheless, the critical consideration of the SSO.

The risk of cross-subsidy by non-SSO consumers

A retailer may also seek to include a price premium to account for the risk that it may not recover the costs it incurs providing energy in the free period. This ‘risk premium’ creates a further predicament for the pricing of the SSO. If the premium is set too high, it reduces the inclusiveness of the offer for those with lower ability to shift demand. In this case any potential benefit of usage shifted to the free period would be far outweighed by the increased costs of usage outside that period. If the premium is set too low, it is likely that retailers will seek to recoup those costs from other consumers, including those on simpler offers. In this case, the benefits of FPPs would effectively be cross subsidised by those who are already most disadvantaged. This must be avoided at all costs.

Risks resulting from opacity in retail cost structures and the nature of the retail market

In any case, if the SSO is made mandatory for retailers, there is a risk of cross-subsidisation through other customers’ plans, to maintain or increase profit margins. This further raises the risk of consumers with limited ability to shift their demand being further disadvantaged.

Due to the lack of transparency of retail pricing – both in terms of the cost structures of any given retail offer, and in the relative cost recovery and margins of different offers within a retailers’ customer base - there are no real barriers to prevent such cross-subsidisation. There is

---

17 ACIL Allen, 2025, The National Electricity Market (NEM) and the emerging 'seasonality paradigm'

substnatial evidence that retailers are currently over-recovering costs; analysis by the ACCC showed around a third of consumers were on retail plans at or above the default offer (DMO/VDO) in 2024.[18] Given this, and the complexity of the retail market,[19] it is not fair to assume that consumers will simply switch to a better offer if they are not paying a fair price, or that it is even easy (or possible) to determine what fair value is.

As noted in the paper, current FPP offers in the market are opaque and inconsistent. People can and will be attracted to the promise of free power, often without being able to adequately compare whether they will be better off overall – that is, whether paying higher rates outside of the FPP and their usage in this period is sufficiently outweighed by usage in the FPP. This presents a high risk of adverse outcomes, especially given consumers tend to over-estimate their capacity to manage their usage, or even understanding how best to meaningfully shift their usage.[20] It is not clear how the suitability of the SSO to individual customers will be determined.

Accordingly in considering the design of the SSO, backstops and other regulatory protections, it will be critical address these risks to ensure it does not result in further inequities and further undermine trust in the energy retail market.

4. Optimising potential benefits

Designing to optimise the benefits of the SSO should focus on avoiding and mitigating the risks we have identified. The challenge is to develop a fair and transparent offer, grounded in more realistic assumptions of behaviour and impact, while ensuring appropriately robust guardrails to ensure good outcomes for consumers whether they take up the SSO or not.

We recommend the SSO be made available by all retailers to all consumers. Parallel reforms mean that the Default Market Offer (DMO) will now also apply to time of use tariffs be based on efficient costs.

We strongly recommend further reforms to ensure the DMO – particularly a flat tariff structured DMO - is made a true default, with all consumers able to opt in to accessing it, including in circumstances where an SSO may not benefit them.

4.1 Tariff design

A key challenge in developing a compliant SSO standing offer is ensuring consumers pay only fair charges outside the zero-charge window, including fixed charges. As we have noted, while it is reasonable to shift some costs elsewhere by raising charges during peak and shoulder periods or through higher fixed charges, without rules to make this transparent, and limit and regulate these charges, consumers may see little benefit from the SSO or even be left worse off.

---

18 ACCC, 2024, Inquiry into the National Electricity Market report, p 27.
19 CHOICE, 2025, The Power of Confusion, p 20.
20 Energy Consumers Australia, 2025, Consumer knowledge of electricity pricing and responsiveness to price signals, p 8.

Implementing robust guardrails

We support the proposal to introduce guardrails that:

- Require SSO standing offers with the same tariff structure as the DMO SSO to comply with the AER-determined tariff caps; and
- Ensure standing offers with different tariff structures (including the SSO) do not exceed the maximum annual bill amount set by the AER.

These guardrails should apply regardless of tariff structure. In other words, the SSO should meet both the DMO tariff cap and the maximum annual bill limit. This would prevent retailers from making minor tariff changes to avoid the cap or adopting the DMO structure to sidestep the annual bill limit.

Recommendation 4

That SSO tariffs offered by retailers may not exceed the tariff cap and maximum annual price cap determined by the AER under the DMO framework.

Avoiding increased fixed charges

We consider it necessary to ensure retailers do not shift any costs from the zero-charge window into fixed charges. This ensures there is some capacity for consumers to mitigate the costs incurred.

Limiting usage increased costs outside the FPP to actual costs

Further, it is necessary to ensure that only unavoidable costs incurred during the free-period are recovered during other periods – that is, that any cost shifting is only for the purposes of maintaining the recovery of costs actually incurred.

We do not support intentionally sharpening price signals outside the zero-charge window in an attempt to shift in consumer behaviour. This places unreasonable burden on consumers and guarantees many consumers will be left worse off. While time-of-use pricing can help enable shifts in discretionary loads like EV charging, hot water, and some appliances, responses depend heavily on household flexibility[21], energy efficiency[22], and most importantly automation. Not all consumers can or will respond equally and it is inappropriate to intentionally penalise consumers unable to do so. Assuming all households can and should be responsible for shifting use ensures deepened disadvantage and widening gaps in energy outcomes between households with and without CER and the key enablers of flexibility.

Recommendation 5

That the AER consider the following principles when determining the SSO tariff cap:

---

21 White and Sintov, 2019, Health and financial impacts of demand-side response measures differ across sociodemographic groups.

22 White, Aisbett, and Shen, 2024, Time-varying rates prompt different responses as a function of home energy efficiency.

- *That consumers on an SSO are better off overall.*
- *Only unavoidable costs incurred during the zero-charge window may be recovered through increased charges in other usage periods.*
- *Costs incurred during the zero-charge window should not be recovered through fixed charges.*
- *Tariff settings outside the free-charge window must be cost-reflective and should not be subject to intentional increases with the purpose of providing stronger price signals.*
- *Costs incurred through the offering of FPP offers should not be shifted to consumers on other offers.*

4.1.1 Determining the zero-charge window

The zero-charge window should not be set as a single, fixed 3-hour period during the day.

We broadly support aligning the potential zero-usage window with the wider periods when rooftop solar output is most available. However, 'consistency' is not necessarily preferable in determining this period.

We recommend considering a wider period within which any 3-hour period may apply. This would contribute to the objective of building community understanding regarding the broadly preferable period to use energy but would enable a beneficial variability in retail offers. It would allow an important flexibility to better reflect when energy is cheapest and most available, while mitigating the risks of unintended consequences.

Wholesale price periods are likely to vary during the year and by season, and widespread coincidence is not desirable, which makes setting a narrow, fixed time period inappropriate.

Setting a more dynamic window helps deliver better system outcomes through variability and because the optimal usage period changes from day to day. This approach would require guidelines to ensure retailers clearly communicate free periods to consumers and help enable them to utilise it effectively. Since the SSO is most suitable for consumers with flexible loads, and is most likely to benefit those with the capability to respond - whether that be through response-enabled smart devices or high interest - a dynamic window is still practical and likely to deliver better outcomes.

While the wider 'window' within which any 3-hour FPP may occur should be relatively easy to determine, design of the SSO should consider enabling the FPP to be seasonally fixed but varied by region. Having seasonal variation in the free zero-charge window helps to provide some certainty while still reflecting wholesale market conditions with some accuracy. The regulator would be able to determine the window based on wholesale market data in each region for the past year.

Recommendation 6

*That the SSO involve setting a wider window within which a 3-hour FPP may be set, with the zero-charge period either able to be set by the retailer **or** set to vary seasonally and between regions.*

4.2 Transparent information provision and informed consent

Effective information disclosure and robust consent requirements are crucial to ensure positive outcomes from the SSO. This includes ensuring those who take it up get maximum benefit from it and ensuring that those for whom its not appropriate do not take it up/stay on it.

If retailers are required to provide information to customers, this should be standardized where possible to build understanding and reduce the regulatory burden of assessing whether the information provided by retailers is appropriate.

Information required at multiple points for multiple purposes

People will be attracted by the idea of 3 hours of free electricity. It must be assumed that this message may obscure a proper assessment of the suitability of the deal. In any case, consumers cannot be assumed to make an accurate assessment their capacity to shift demand and benefit. It is not sufficient to provide information on the theoretical or potential benefits of the SSO. More specific information upfront, assistance to compare and assess the offer, and ability to move off an SSO are all necessary.

Comparison with actual bills and actual usage

To be able to fully understand whether the SSO is suitable for them, people must be able to see a bill comparison between their current offer and the SSO, based on current actual or historic use. Critically, this comparison must not assume any behaviour or usage change. Ideally this information would also be accompanied by specific suggestions of simple measures to achieve material shifts in usage.

The ability to compare should also be ongoing, for example as part of better offer statements which should include both the “best offer” as per the better bills guideline as well as the automatic fall-back offer. This would be complemented by more general information on the benefits and risks for different types of customers.

Potential role for Government

There is also a role for Government to offer a neutral and trusted source of information for consumers interested in the SSO. Given recent examples of predatory sales tactics[23] and inaccurate information provision[24] by retailers, there is a need for Government to provide general information to consumers on who is most likely to benefit, what is required to do so, and what are

[23] Essential Services Commission, 2025, Energy retailer fined $341,724 for illegal telemarketing

[24] Essential Services Commission, 2025, EnergyAustralia fined over $1 million for giving customers incorrect information about its best energy deals

the risks involved. This could be done through channels that the Government currently uses to share information with energy consumers, as well as through trusted community organisations.

We recommend that information disclosure requirements include a principle of accessibility and inclusiveness. It is not simply enough for consumers to have access to information, but rather this information needs to suit the needs of diverse groups of consumers.

Clearly signaling a fall-back and making it easily accessible

It is critical that consumers can easily assess whether they are getting bill savings from the SSO and opt-out if they determine the offer is no longer suitable for them. Better offer statements on bills and other communications materials will help, but these must be complemented by a simple process for consumers to take up fall-back or default offers.

This fall-back offer must be easily accessible, meaning the process to switch must simple. We recommend the explicit and informed consent provisions of the SSO provide an option for a consumer to give permission to be automatically switched to a fall-back offer if it would leave them better off. This process should also include a notice of an automatic switch occurring and option to opt out.

We recommend that the fall-back offer be another regulated offer such as an offer based on a flat-tariff DMO, to ensure that customers who cannot benefit from the SSO can still receive a 'fair' price.

Recommendation 7

That introduction of the SSO involve information and consent provisions to inform and protect consumers, including:

- *Standardised information on:*
    - *who is most likely to benefit from an SSO,*
    - *what is required to benefit,*
    - *risks in taking up an offer,*
    - *simple measures to shift usage for material benefit, and*
    - *their rights to opt-out of an SSO offer and how to do so.*

  This should be available to all consumers interested in taking up the SSO and should be accessible and able to meet the diverse needs of consumers.
- *Requiring bill comparisons between their current offer and an SSO to be made on the basis of actual usage without assumed behaviour change.*
- *Ensuring a guaranteed option to switch to a fall-back offer (such as a non-SSO fair-priced standing offer) at any time.*

- *Enabling a consumer to give permission to be automatically switched to a non-SSO standing offer if it would leave them better off. This permission should be accompanied by an option to opt-out within 10 days' of receiving notice of an automatic switch.*

4.3 Evaluation of the SSO

Proper evaluation of the effectiveness of the SSO will be critical to monitor its implementation, its impact on consumers and the energy system, as well as shaping further programs and reforms.

The SSO's effectiveness should primarily be measured against our updated objectives. However, evaluation should also examine wider impacts on non-SSO consumers and the energy system, including potential unintended consequences. Outcomes of this evaluation should be transparently reported as part of the wider DMO process. Based on the benefits and risks raised throughout the paper, at a minimum we propose the following evaluation metrics be provided by retailers and DNSPs:

- The number and proportion of consumers that take up the SSO – where possible this should also include a breakdown of those consumers, including by:
    - region/network,
    - rebate/concession status,
    - payment difficulty/debt status, and
    - usage profile/bill by decile;
- The number and proportion of consumers on the SSO with a better possible offer;
- Metrics to assess the correlation between changes in local network utilisation and load profiles and uptake of the SSO in those networks;
- Trends in wholesale prices during the middle of the day, including alignment with free power periods, and periods of conflict between FPPs and low/negative pricing.

It would be valuable to undertake regular qualitative research to understand the profiles of consumers who successfully take up SSO offers, as well as those who try an SSO but are unable to benefit from it. This may be collected as part of a qualitative review of the SSO which investigates who is taking up the SSO and how much (and how) they are able to benefit, and critically, what are the determining factors for those who try an SSO but are unable to realise assumed benefits.

This information would be critical for further reform and to inform programs to build on the objectives of the SSO.

4.4 Wider measures required to deliver on the intent of the SSO

As we have noted throughout, to deliver on the wider intent of the SSO – both to materially influence the efficiency of the energy system, and improve equitable distribution of the benefits of solar – a comprehensive suite of supporting measures is required.

Central to any wider success of the SSO in delivering its intent is support for the electrification of major household loads and household energy efficiency upgrades. Modelling by IEEFA shows that upgrading inefficient electric appliances to efficient electric alternatives can lead to a 58% reduction in peak demand.[25] While electrifying gas appliances influences demand peaks, electric appliances can become flexible loads able to benefit from the SSO. IEEFA also found that thermally efficient homes have greater peak reduction potential compared to typical homes.[26] Many households have low-cost opportunities to improve thermal efficiency, with potential for significant energy bill savings.

Not all households have the option to make efficiency or electrification upgrades, with groups such as renters, apartment-dwellers and low-income households facing substantial barriers. Coordinated programs to replace appliances, support electrification and efficiency must be part of a strategic approach to make household energy demand more electric, efficient and flexible to better enable all consumers to equitably benefit from the transition. We refer to the Roadmap for Efficient and Electric Homes for more detail on the suite of measures required to electrify and improve the energy performance of housing to enable more equitable and substantial benefit from the SSO.

We highlight and reiterate recommendations for supporting measures detailed earlier in this submission and strongly encourage the Department to recommend them for further consideration as part of implementation of the SSO.

It is also necessary to progress reforms to enable household demand to be more flexible, controllable, and able to realise market benefits. We advocate for the expansion of the wholesale demand response mechanism to households.[27] This would complement measures such as the SSO to increase the pool of available flexible demand.

5. Response to consultation questions

Prices and timing

2.1 What evidence should inform the SSO window (timing and duration), including factors such as wholesale prices, renewable generation output, demand trends and local network condition?

3.3 What principles should guide how the AER (and relevant state regulators) set SSO standing offer prices, including how to reflect the $0 per kWh usage window without distorting costs or creating excessive cross-subsidies?

---

25 Institute for Energy Economics and Financial Analysis, 2025, A focus on homes, not power plants, could halve energy bills, p 17.

26 Institute for Energy Economics and Financial Analysis, 2025, A focus on homes, not power plants, could halve energy bills, p 22.

27 For more detail see Justice and Equity Centre, 2025, Submission to Review of the Wholesale Demand Response Mechanism

4.2 How might the AER weigh up the availability of solar energy for use in a zero-charge usage window, wholesale market dynamics and distribution network conditions in determining the SSO?

4.7 What other factors may the AER need to take into account in calculating an SSO so that it meets the new policy objectives and proposed regulatory requirements for the DMO?

A key challenge in developing a compliant SSO standing offer is ensuring consumers pay only fair charges outside the zero-charge window, including fixed charges. As we have noted, while it is reasonable to shift some costs elsewhere by raising charges during peak and shoulder periods or through higher fixed charges, without rules to make this transparent, and limit and regulate these charges, consumers may see little benefit from the SSO or even be left worse off.

We recommend that the AER consider the following principles when determining the SSO tariff cap:

- Only unavoidable costs incurred during the zero-charge window may be recovered through increased charges in other usage periods.
- Costs incurred during the zero-charge window should not be recovered through fixed charges.
- Tariff settings outside the free-charge window must be cost-reflective and should not be subject to intentional increases with the purpose of providing stronger price signals.
- Costs incurred through the offering of FPP offers should not be shifted to consumers on other offers.

The zero-charge window should not be set as a single, fixed 3-hour period during the day. We recommend that the SSO involve setting a wider window within which a 3-hour FPP may be set, with the zero-charge period either able to be set by the retailer **or** set to vary seasonally and between regions.

Benefits and risks

2.3 What benefits should be expected from the introduction of the SSO? How can risks to customers who choose the SSO but are less able to shift their energy usage be identified and mitigated?

2.4 Are there likely to be any practical constraints on certain customer cohorts who could benefit from an SSO being able to accrue those benefits through increasing their consumption in the SSO window?

3.6 How could customers without solar PV and batteries, including vulnerable or disengaged households benefit from the SSO? What risks to vulnerable or disengaged households need to be taken into account?

3.5 How could a regulated SSO framework best complement or build on the innovative time-based pricing models already emerging in the market?

3.8 What wholesale market or system-level benefits (e.g., demand shifting, reduced peak prices, better utilisation of daytime solar generation) could arise from widespread uptake of the SSO and are there complementary policies that would further increase these benefits?

As proposed it is most likely that households who already have access to CER – such as batteries, electric vehicles, efficient electric appliances and home management systems - stand to benefit most from this type of offer. Conversely, households already experiencing disadvantage – including renters, low-income households and others without solar and efficient electric households – are those least likely to be able to benefit. This is despite the fact they are identified as the intended beneficiaries.

Given the prevalence of adverse experiences of consumers being placed on time of use offers, we recognise the merit of having a regulated, reasonably priced offer. If implemented with the appropriate safeguards, the SSO can:

- Provide a trusted and fair Free Power Period Time of Use Offer (FPPTOU) all consumers can access, and which serves as a comparison for other FPP and TOU offers.
- Support consistent community understanding that electricity is generally more available and cheaper in the middle of the day.
- Contribute to more efficient demand and the efficient use of renewable generation when it is abundant.

However, widespread uptake of the SSO may have unintended consequences on wholesale market dynamics and increasing complexity in the retail market (see section 3 of this submission for more detail).

Evaluation

2.2 How should the effectiveness of the SSO be evaluated over time, noting its multiple objectives (e.g., ensuring SSO take up, and reducing bills for customers without access to CER)?

3.9 What data should the department and regulators use to evaluate policy and market benefits of the SSO?

4.5 What key metrics or indicators should be used to measure the effectiveness of the SSO post- implementation in terms of impacts on affordability, equity, consumer empowerment and changes in demand?

We caution that the current objectives of the SSO are unsuitable, and therefore its success should not be measured against them (see section 2 of this submission for more detail).

We strongly support the development of an evaluation mechanism to assess the effectiveness of the SSO. We recommend effectiveness be measured against our proposed objectives in section 2, to enable good outcomes for consumers who choose to take up the offer and the wider network. Outcomes of this evaluation should be transparently reported as part of the DMO

process. Based on the benefits and risks raised throughout the paper, we propose the following evaluation metrics be provided by retailers and DNSPs:

- The number and proportion of consumers that take up the SSO – where possible this should also include a breakdown of those consumers, including by:
    - region/network,
    - rebate/concession status,
    - payment difficulty/debt status, and
    - usage profile/bill by decile;
- The number and proportion of consumers on the SSO with a better possible offer;
- Metrics to assess the correlation between changes in local network utilisation and load profiles and uptake of the SSO in those networks;
- Trends in wholesale prices during the middle of the day, including alignment with free power periods, and periods of conflict between FPPs and low/negative pricing.

Regulation and compliance

3.1 Does the proposed SSO regulatory framework — anchored in the Electricity Retail Code and linked to the DMO — appropriately balance affordability, equity, and retailer flexibility? Are alternative approaches preferable?

3.7 How should the department and regulators monitor whether retailers are recovering the costs of providing the SSO in a transparent and equitable way across tariff offerings?

4.1 Should all electricity retailers be required to make an SSO standing offer available to eligible customers, or should exemptions be provided to certain retailers or class of retailers? What criteria should be used to determine any exemptions or carve out of retailers or class of retailers? How could exemptions be implemented to avoid undermining national consistency or consumer access?

4.3 Are the proposed information disclosure and consent requirements sufficient to ensure customers understand how an SSO offer works and whether it suits their energy usage patterns?

4.6 Is the proposed definition of a compliant SSO standing offer, particularly the minimum zero-charge usage window and limits on fixed-charge recovery, appropriate to deliver meaningful consumer benefits?

We consider the proposed SSO regulatory framework is appropriate and recommend the SSO be made available by all retailers to all customers. However, this must be supported by effective information disclosure and consent requirements, including:

- Standardised information on:

- who is most likely to benefit from an SSO,
- what is required to benefit,
- risks in taking up an offer,
- simple measures to shift usage for material benefit, and
- their rights to opt-out of an SSO offer and how to do so.

This should be available to all consumers interested in taking up the SSO and should be accessible and able to meet the diverse needs of consumers.

- Requiring bill comparisons between their current offer and an SSO to be made on the basis of actual usage without assumed behaviour change.
- Ensuring a guaranteed option to switch to a fall-back offer (such as a non-SSO fair-priced standing offer) at any time.
- Enabling a consumer to give permission to be automatically switched to a non-SSO standing offer if it would leave them better off. This permission should be accompanied by an option to opt-out within 10 days' of receiving notice of an automatic switch.

It will also be crucial for regulators to monitor whether retailers are cross-subsidising between the SSO and non-regulated offers. This must be done through careful price monitoring, which is complicated by the lack of transparency over electricity retail offerings. See section 4 of this submission for more detail.

6. Continued engagement

Our organisations would welcome the opportunity to further discuss these matters with DCCEEW, the AER and other relevant stakeholders. Please contact Kira van Os (kvanos@jec.org.au) to arrange any follow-up.