

Submission to QCA consultation on Regulated Electricity Tariff transitional issues

Thank you for the opportunity to make a submission to the consultation.

I am an irrigation farmer at St. George and have an electric pump station that is used for pumping flood water predominantly.

Last year I used about 87000kW hours at this site on Tariff 62 which is now obsolete.

If I move to Tariff 22, which you contend more accurately reflects the cost of supply, then my costs based on usage of say 99MWh would actually go down slightly ( see table 1 ). If however I use another 1KWh then I become a large customer and would need to go to Tariff 44. This Tariff is also supposed to be cost reflective but the extra 1KWh costs me \$48190.

This analysis shows the utter nonsense that the new Tariffs have introduced.

Your paper states in 3.1 that the old tariffs were not cost reflective and yet Tariff 62 is actually more than the new Tariff 22 in my scenario and has a much better differential between peak and off peak prices. How can you possibly justify a 2.3 cent differential between peak and off peak prices? I put it to you that the generators have suggested these small differentials to reduce the uptake of solar PV.

You state in 4., that the new large Tariff was introduced to better reflect the costs of supplying these large customers. How can you justify the fact that Tariff22 would cost me \$21296 and Tariff44 \$70572? – they both can't be cost reflective.

I would put it to you that the obsolete Tariff 62 is actually a better Tariff than the new Tariffs in that it is obviously cost reflective (actually costs more than Tariff22) and has a much greater incentive not to use peak power. Tariff 44 is totally unsuitable to irrigation scenarios such as mine and I would contend is unsuitable to any existing customer. If this Tariff does eventually apply to my irrigation pumps, I will be forced to abandon the electric motors and replace them with diesel engines.

TABLE 1  
Irrigation Site 2 Burgorah St George  
Monthly usage

Month	day kW	night kW	max kW demand	Tariff 62	Tariff 22	Tariff 44
July	200		30	90	80	1278
Aug	200		30	90	80	1278
Sep	200		220	90	80	7542
Oct	10000	15000	220	5501	5247	10436
Nov	10000	15000	220	5501	5247	10436
Dec	10000	15000	220	5501	5247	10436
Jan	4000	6000	220	2211	2120	8685
Feb	4000	6000	220	2211	2120	8685
Mar	1800	2000	220	916	834	7962
Apr	200		30	90	80	1278
May	200		30	90	80	1278
June	200		30	90	80	1278
TOTALS	41000	59000		\$22,382	\$21,296	\$70,572