

06 May 2026

Queensland Competition Authority
GPO Box 2257
Brisbane QLD 4001
Submitted online

Dear Sir/Madam

Endorsement of Queensland Farmers' Federation submission – Draft Determination

CANEGROWERS writes to formally endorse and support the submission made by the Queensland Farmers' Federation (QFF) in response to the QCA's Draft Determination for the 2026-27 regional electricity price determination.

CANEGROWERS considers that the QFF submission accurately reflects the operational realities of irrigated agriculture and clearly articulates the key issues facing regional electricity users, particularly in relation to tariff design, affordability, and the alignment of pricing structures with agricultural electricity use.

In particular, CANEGROWERS strongly supports QFF's position that:

- the current tariff framework does not adequately support flexible agricultural loads, including irrigation pumping;
- the removal of Tariff 22C without a functionally equivalent replacement creates a material gap for irrigators;
- new tariff structures, including the proposed EV tariff, should be designed to support broader flexible loads, not be limited to residential customers; and
- the current 100 MWh Small Customer threshold is not fit-for-purpose and results in significant and disproportionate bill impacts for irrigators.

CANEGROWERS draws particularly attention and strongly endorses QFF's position that the most appropriate and durable solution to the Small to Large Customer transition issue is to increase the threshold from 100 MWh to 160 MWh.

This reform would directly address the underlying structural problem, rather than relying on increasingly complex tariff mechanisms to manage its effects. The current threshold creates a pricing cliff that is inconsistent with the seasonal and variable nature of agricultural electricity use and acts as a disincentive to efficient electrification and the use of low-cost daytime electricity.

CANEGROWERS therefore strongly encourages the QCA to formally recommend this policy change to the Queensland Government, consistent with its role in identifying structural issues affecting tariff outcomes.



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While CANEGROWERS appreciates the QCA's role within the current regulatory framework, the Draft Determination reinforces that many of the most significant issues raised by stakeholders – including tariff structures, customer classification thresholds, and broader market settings – are consistently characterised as being outside the scope of the determination.

This creates a situation where well-evidenced and widely supported issues are acknowledged, but not progressed, limiting the ability of the process to deliver meaningful outcomes for regional customers. CANEGROWERS considers that, where such issues are clearly identified, the QCA should take a more active role in providing advice and recommendations to Government, rather than limiting its response to noting stakeholder concerns.

CANEGROWERS remains committed to engaging constructively in the determination process and appreciates the opportunity to provide input. However, it is important that stakeholder contributions are able to inform not only pricing outcomes, but also the policy settings that underpin them, particularly where those settings are demonstrably misaligned with customer needs and system objectives.

We encourage the QCA to use this process to clearly articulate where structural reform is required, and to provide appropriate recommendations to Government to support more effective and efficient electricity pricing outcomes in regional Queensland.

Yours sincerely

Dan Galligan
Chief Executive Officer