



Part of Energy Queensland

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Mr Charles Millstead
Chief Executive Officer
Queensland Competition Authority
GPO Box 2257
Brisbane QLD 4001

Dear Mr Millstead

Ergon Energy Queensland submission – EV Tariff Proposal

The rapid integration of CER is reshaping Queensland's energy system, particularly in regional Queensland. The Queensland Government Energy Roadmap refers to "*Ergon Retail trialling a new retail tariff for low-cost EV charging*" and this intent is reflected in the Ministerial pricing delegation to the Queensland Competition Authority (QCA).

Customers have told us that existing tariffs must evolve to reflect the changing energy landscape and accelerating technology uptake. Introducing the proposed EV tariff is critical to delivering for our customers and on Government policy objectives. It provides customers with flexible EV loads the opportunity to access lower-cost pricing options.

Ergon Energy Queensland's (EEQ's) proposed EV tariff responds to customer preferences for affordability, convenience, technology access, and independence. It also rewards the use of flexible loads at times that balance customer, retailer and system outcomes. In promoting efficient production and consumption behaviour, the tariff will also, over time, help place downward pressure on prices.

In assessing the proposed EV tariff, we encourage the QCA to consider the availability of comparable tariffs in Southeast Queensland, and to recognise that the proposal provides a practical, efficient and important step towards product equivalence, supporting better outcomes for regional customers.

We consider the proposed EV tariff can be offered under a Standard Retail Contract and can be gazetted for inclusion in the FY27 pricing period, commencing on 1 November 2026.

The attached submission sets out the detailed tariff design and our response to the two consultation questions raised by the QCA.

Should the QCA require additional information in relation to this submission, please contact Andrea Wold, Manager Retail Policy, Compliance & Assurance on 0428 384 448.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Ayesha Razzaq'.

Ayesha Razzaq
Executive General Manager Retail

Ergon Energy Queensland Pty Ltd (EEQ)

Submission to the Queensland Competition Authority

Proposed Electric Vehicle (EV) tariff

February 2026

1. Executive Summary

Ergon Energy Queensland (EEQ) requests the Queensland Competition Authority (QCA) determine and gazette a new residential Electric Vehicle (EV) “scheduled charging tariff” for inclusion in the 2026–27 Notified Prices, in accordance with the Treasurer’s pricing delegation.

EEQ proposes an opt-in tariff delivered as a bill adjustment (essentially a negative tariff price) credited against a customer’s existing primary tariff (e.g. Tariff 11 or 12E). This design:

- Is a time of use tariff structure similar to other existing tariffs developed by the QCA;
- Can be offered under a Standard Retail Contract (SRC) without removing SRC protections;
- Provides a clear price signal to encourage scheduled EV charging outside the evening peak (4:00pm–9:00pm), supporting system efficiency and peak management; and
- Sets a benchmark EV Scheduled Charging rate aligned with what retailers in the competitive Southeast Queensland (SEQ) market could reasonably offer.

The Treasurer’s delegation for the 2026–27 tariff year establishes a new process for assessing EEQ’s EV tariff proposal that is not required to apply the Network plus Retail (N+R) cost build-up methodology. Instead, QCA’s assessment must consider whether:

- The EV tariff can be offered under an SRC; and
- The tariff rates should apply based on what could reasonably be offered by a retailer in the SEQ electricity market.

The detail below explains why EEQ considers the proposed EV tariff can be offered under an SRC and proposes a mechanism (capped at the Tariff 31 WEC) by which the QCA could determine the rate. EEQ confirms it is engaging with Queensland Government regarding the CSO implications.

2. Proposed Tariff

2.1 Tariff rate

Noting the QCA will determine the EV tariff rate, EEQ has not proposed a defined rate. Instead EEQ recommends the rate be no more than Tariff 31 and be otherwise aligned with what retailers in the competitive Southeast Queensland (SEQ) market reasonably offer.

2.2 Tariff design

EEQ's EV tariff would operate as a Time of Use tariff that provides an adjustment in the form of a credit to a customer's bill. This mechanism has been demonstrated over time and is consistent with that used by several retailers in SEQ. Currently, the gazette includes tariffs with negative adjustments. Similarly, EEQ regularly applies negative adjustments directly to bills (e.g. to give effect to Cost of Living rebates).

The tariff design is similar to a load control tariff but with three key differences:

1. Customers have greater control and autonomy over how and when they charge;
2. Customers can access the tariff via a simpler (and cheaper) technology pathway which does not require manual wiring of the EV or charger to integrate with EEQ's systems; and
3. It will have a time of use structure.

The three-part TOU structure includes Peak, Shoulder, and Off-peak windows defined consistent with other tariffs (e.g. 12E). Specifically, it would be priced as:

- Peak – charged at the primary tariff rate;
- Shoulder – charged at the discounted “EV charging rate”; and
- Off-peak – charged at the same discounted “EV charging rate” as the Shoulder period.

All electricity usage would continue to be billed under the customer's primary notified tariff (e.g. Tariff 11 or 12E). However, energy consumed and measured via eligible EV scheduled charging sessions would be adjusted via a credit (adjustment) visible on the customer bill to equal the EV tariff rate where that rate is cheaper than the primary tariff.

This design is intentionally low-friction, protects customers from bill shock associated with tariff reassignment, and targets only the flexible EV load. This approach is consistent with other similar EV tariffs available in SEQ and regional Queensland.

2.3 Gazettal

To support the QCA in its assessment of the EV tariff, suggested parameters to be incorporated in the gazette are set out below:

- a) Tariff [X] provides an incentive for scheduled charging of electric vehicles (EVs) and compatible equipment.

- b) All electricity supplied by the retailer is billed in accordance with the customer’s primary notified tariff. An adjustment is applied as a separate line item on the customer’s bill, based on scheduled charging during the bill period.
- c) Customers may choose whether or not to undertake scheduled charging on each occasion.

Definitions.

- a. Adjustment is the credit applied to eligible EV scheduled charging usage. This is calculated as the difference between the customer’s primary tariff usage rate and the EV Tariff [X] usage rate (Rate) for scheduled charging (where that Rate is lower), multiplied by eligible usage.
- b. An Eligible Customer is a small customer who, at the relevant supply address:
 - a. Has a Type 4 metering installation with remote communications enabled;
 - b. Has compatible equipment or systems that are internet connected (or otherwise capable of providing the data required by the retailer to administer Tariff [X]);
 - c. Ensures the compatible equipment or system remains capable of communicating with the relevant retailer; and
 - d. Has a residential primary tariff with the relevant retailer.
- c. A Participating Customer is an Eligible Customer who:
 - a. Has opted in to Tariff [X] in accordance with the retailer published process;
 - b. Complies with any reasonable technical and operational requirements published by the retailer that are necessary to administer Tariff [X]; and
 - c. Uses their Retailer’s systems for Scheduled Charging.
- d. Scheduled Charging occurs when initiated and scheduled by the customer in the Retailer’s system provided it is outside the daily Peak period. Scheduled Charging is not available during the Peak period and no Adjustment is applicable. Any charging during the Peak period is not Scheduled Charging.

Tariff [X] table.

Tariff	Description	Charge type	Rate	Unit
[X]	Residential Electric Vehicle Tariff for Scheduled Charging (and Adjustment Calculation)	Usage:		
		Peak (4pm – 9pm)	NA	
		Day (11am – 4pm)	16.471*	c/kWh
		Night (all other times)	16.471*	c/kWh

* QCA determined FY25/26 Tariff 31 rate excluding GST as illustrative example.

To illustrate this mechanism, three examples are provided using FY25/26 gazetted rates:

1. Customer has primary Tariff 11. EEQ would be apply an Adjustment for EV Scheduled Charging usage of 29.974 (Primary Tariff Rate) – 16.471 (EV Tariff Rate) = 13.503 c/kWh;
2. Customer has primary Tariff 12E, EEQ would be apply an Adjustment for EV Scheduled Charging usage of:

- a. 23.977 (Primary Tariff Rate) – 16.471 (EV Tariff Rate) = 7.506 c/kWh for the Night period; and
 - b. no adjustment for the day period as the primary tariff is lower than the EV scheduled charging rate, the customer would receive the primary tariff rate without adjustment.
3. Customer has primary Tariff 11 and charges their EV during the peak period. Because this is not Scheduled Charging and there is no Tariff [X] rate applicable for that usage period, the customer would receive the primary tariff rate without Adjustment.

Alignment to Ministerial delegation’s Two Assessment Tests

(a) Can the tariff be offered under a Standard Retail Contract (SRC)?

A SRC is the regulatory contract governing the sale of electricity between the retailer and the customer. It provides a higher level of consumer protections than an MRC where customers can choose a lower price outcome in exchange for reduced protections. EEQ confirms that the proposed EV tariff does not require a customer to waive or modify any SRC protections. Rather, the SRC applies in full and unchanged.

For an improved customer experience, customers will be provided an app to input their scheduled charging parameters. EEQ’s view is that the requirements to access the app merely enables customer access to the functionality of the app, similar to the terms required to access a retailer’s online portal for self-serve functions to view usage data or change tariff. Any potential bill disputes will be managed in accordance with EEQ’s Complaints and Dispute Resolution Procedure which is available on EEQ’s website at [Complaints and Dispute Resolution Procedure 2025](#).

With respect to the conditions to access the tariff, we suggest there is ample precedent. The existing gazette includes a broad range of criteria that condition tariff access including, metering type (Tariff 43-46, 12E, 22E), access to the distribution entity standard load control signalling system (Tariff 60A, 60B), load control equipment installed in accordance with the QECM (Tariff 31-34, 60A, 60B), demand and energy thresholds (Tariff 49), a predictable load pattern (Tariff 91), and even the very specific requirements set out in Tariff 71 (e.g. a road that is a footpath or bicycle path). Conditions to access the EV tariff via the app and EV/equipment compatibility is analogous to these requirements (e.g. load control equipment installed in accordance with the QECM) and is not relevant to whether the product can be offered as a SRC.

(b) Are the tariff rates consistent with what a retailer could reasonably offer in SEQ?

EEQ notes the delegation does not require this tariff to be developed using the Network + Retail (N+R) pricing methodology. The proposed EV tariff should be assessed against comparable EV products offered by retailers in SEQ and regional Queensland. This approach is consistent with the Uniform Tariff Policy (UTP) which provides that customers of the same class should, where possible, pay no more for electricity and should have access to similar tariff structures irrespective of geographic location. Smart EV charging options exist in SEQ, and regional customers should have access to equivalent options through the notified price framework.

EEQ's review of SEQ offerings indicates that several retailers currently advertise:

- EV-specific rates from 6c/kWh for overnight or smart-scheduled charging;
- Some products offer zero-cost daytime windows to promote charging during periods of high solar output;
- 'Whole of house' time of use offers marketed towards customers with EVs; and
- Load control tariffs that can be utilised for EVs (provided relevant metering and connection requirements are met).

EEQ is also aware of at least one smart charging EV product already available in regional Queensland. EEQ therefore proposes that the tariff rate reflect an appropriate balance between cost recovery (noting the additional protections offered by the SRC) and equivalence with SEQ EV offers and be no more than the rate be no more than Tariff 31.

EEQ also notes that the Queensland Government Energy Roadmap states that regional Queensland will trial a *new retail tariff for low-cost EV charging*. The policy intent contemplates a price that strikes an appropriate balance between cost and incentivising customers to charge at times when *"Queensland can better utilise its distribution network, make the most of its high uptake in rooftop solar and delay costly network upgrades from increasing periods of peak demand"*¹. The proposed tariff aims to give effect to these objectives through the mechanism set out in the Ministerial Price Delegation. Noting this tariff is new to regional Queensland, EEQ may seek to amend the pricing or tariff structure for the FY28 year based on learnings and customer uptake through the FY27 period.

3. Other matters:

a) Customer communication

Consistent with its proactive approach to customer communication regarding tariff pricing and access conditions, when the EV tariff is created EEQ will provide customers with information regarding:

- How the tariff and scheduled charging works and how credits are calculated;
- Compatible EV/chargers and connectivity;
- FAQs to support customer access to the tariff; and
- Reference to the dispute and complaint management procedure.

b) CSO implications

As per the delegation, EEQ will consult with Queensland Treasury on potential CSO implications.

c) Commencement

As a new tariff, EEQ recommends that this tariff be commenced on 1 November 2026.

¹ P. 53 of Energy Roadmap [Queensland Government Energy Roadmap 2025](#)