



Tasmanian Council of Social Service Inc.

Inquiry into Energy Prices in Tasmania

October 2023



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About TasCOSS

TasCOSS' vision is for one Tasmania, free of poverty and inequality where everyone has the same opportunity. Our mission is two-fold: to act as the peak body for the community services industry in Tasmania; and to challenge and change the systems, attitudes and behaviours that create poverty, inequality and exclusion.

Our membership includes individuals and organisations active in the provision of community services to Tasmanians on low incomes or living in vulnerable circumstances. TasCOSS represents the interests of our members and their service users to government, regulators, the media and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage, and promote the adoption of effective solutions to address these issues.

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Introduction

TasCOSS welcomes this opportunity to respond to the Legislative Council Sessional Committee *Inquiry into Energy Prices in Tasmania*. Our submission outlines the significant financial pressures Tasmanians living on low incomes are experiencing as a result of substantial increases in the cost of energy, without commensurate increases in income.

Low income Tasmanians are more likely to live in poorly-insulated and inefficient housing stock, and spend a higher proportion of their income on energy than others. They are least able to respond to increases in prices, or to invest in more energy efficient homes and measures.

Given that energy is an essential service, energy price rises leave low income households with little option but to pay the extra and forego other essentials, ration their energy use, or enter into energy debt. Or a combination of these, each of which has a detrimental impact on individuals' physical and mental health and wellbeing.

All Tasmanian households, regardless of their means, should have access to a safe, reliable and affordable energy supply. However, the reality for many Tasmanian households - in particular low income households and customers experiencing vulnerability and disadvantage - is that their electricity supply is unaffordable. This is evidenced by the following Tasmanian data:

- 22.5% increase in electricity prices in two years.¹
- 29% increase in the number of customers repaying an electricity debt in the past year to 14,675 (127% increase since COVID-19, up from 6,454).²
- 50% increase in household energy debt in the past year to \$15.7 million (and 166% increase since COVID-19, up from \$5.9m).³
- 13.6% increase in the number of customers entering a retailer hardship program in the last year.⁴
- 92,837 customers on an energy concession (36.5% of residential customers).⁵
- 68% of hardship customers are also concession customers.⁶
- 42% increase in the number of customers accessing Energy Hardship Fund (EHF) payments in the past year.⁷
- 20% of Tasmanians missed a utility bill payment in the last three months.⁸

¹ [Office of the Tasmanian Economic Regulator \(OTTER\)](#).

² OTTER, [Projects on the Go](#), October 2023.

³ Ibid.

⁴ Ibid.

⁵ Australian Energy Regulator 2023, [Quarterly retail performance report January – March 2023](#).

⁶ OTTER, [Projects on the Go](#), October 2023.

⁷ The Salvation Army, Energy Hardship Fund data, 2022-23.

⁸ [NAB Consumer Insights, Q2 2023](#).

- 48% of Tasmanian households are more concerned about paying their electricity bill than they were a year ago.⁹
- 72% of Tasmanian households lack confidence that the energy market is working in their long-term interests.¹⁰

Since the impact of the COVID-19 pandemic in 2020, The Tasmanian Government has taken some welcome action to support Tasmanian electricity customers from the impacts of cost of living:

- freezing prices, waiving fees and charges, introducing a moratorium on disconnections and establishing a \$5 million *COVID-19 Customer Support Fund* during the COVID-19 pandemic;
- introducing an electricity price cap to protect customers from price volatility in the National Electricity Market (NEM);
- funding bill rebates and increased concessions for eligible customers;
- funding for the Energy Hardship Fund;
- additional funding for the *No Interest Loans Scheme* (NILS);
- launch of the *Energy Saver Loan Scheme* (ESLS); and
- removing the up-front fee for *aurora+*.

But in the current environment of cost of living pressures and escalating energy price increases, there is more that can be done on prices and affordability to support Tasmanian customers.

This submission focuses more specifically on electricity (rather than energy) prices, as this is the primary energy source for Tasmanian households. TasCOSS' concern regarding escalating gas prices, forecast gas supply shortages and contributions to greenhouse gas emissions, can be found in our submission to the Tasmanian Government's *Draft Future Gas Strategy*.¹¹

Key Issues

Energy prices are a top cost of living issue for Tasmanian households. The Australian Energy Regulator (AER) has reported increasing concerns about energy affordability against a backdrop of 1-in-2 households being more concerned about paying their energy bills than a year ago, and the numbers of customers in energy debt increasing since mid-2022.¹²

Tasmanian consumers are under pressure to meet the high and rising costs of energy. The ability for Tasmanian consumers to respond to increases in prices, invest in more energy efficient homes or make

⁹ Energy Consumer Australia, [Sentiment Survey](#), June 2023.

¹⁰ Ibid.

¹¹ TasCOSS (2023), [Draft Future Gas Strategy for Tasmania](#).

¹² AER 2023, [State of the Energy Market 2023](#), Australian Government, Canberra, p1.

decisions about their energy usage, is impacted by a range of factors related to Tasmania's higher levels of disadvantage compared to the rest of the nation:

- Tasmanians have the lowest incomes in Australia with:
 - average weekly full-time earnings around 88% of the national average;¹³ and
 - average weekly equivalised disposable household incomes around 85% of the national average.¹⁴
- Tasmanian households use more electricity than households on the mainland.
- Tasmanian consumers living on low incomes are most likely to live in poorly-insulated and inefficient housing stock, and experience higher energy costs due to the need for additional heating and cooling to compensate for the heating/cooling loss.
- Tasmanian households with low incomes are paying disproportionately more of their income on energy than others.
- Rents have risen sharply in Tasmania to be amongst the highest in the nation. Tasmania's median weekly rent has increased by 44% in four and a half years, the highest increase in the country. Greater Hobart is the least-affordable metropolitan area in Australia to rent. Rents in Tasmania are rising at up to 10-times faster than income support payments.¹⁵ According to the Australian Financial Review, 40,000 Tasmanian households are in rental stress.¹⁶

These factors combine to deliver unaffordable energy costs for many Tasmanian households and electricity bills that represent a significant proportion of household budgets. Reducing energy prices and making electricity more affordable will go a long way to improving standards of living for Tasmanian consumers.

Factors that impact energy prices for Tasmanian households and small and medium business customers, with particular reference to energy generation, distribution and retail costs.

To underpin our advocacy on energy affordability for Tasmanians on low incomes, in 2021 TasCOSS commissioned research and a report on electricity prices across the NEM to better understand Tasmanian prices in comparison to other NEM jurisdictions.¹⁷ This report is provided at Attachment 1.

This research confirmed that Tasmanians pay the highest electricity bills in the country as a result of our high levels of electricity consumption, driven by factors such as a relatively cool climate, a low penetration of natural gas and older housing stock with poor energy efficiency performance.

¹³ Australian Bureau of Statistics (May 2023), [Average Weekly Earnings, Australia](#), ABS Website, accessed 10 October 2023.

¹⁴ Australian Bureau of Statistics (2019-20), [Household Income and Wealth, Australia](#), ABS Website, accessed 10 October 2023.

¹⁵ Tenants' Union of Tasmania 2023, submission to the [Select Committee on Cost of Living](#).

¹⁶ Financial Review (2023), [Tasmania shows the way for housing solution](#), accessed 10 October 2023.

¹⁷ Goanna Energy Consulting (2021), Tasmanian residential electricity prices: how do they compare?

It also revealed that customers on the mainland have greater access to market offers which result in lower electricity prices than Tasmania's regulated prices. One of the main reasons for the prevalence of market offers is competition in the retail market.

This report also made a number of key findings regarding energy affordability for residential customers in Tasmania relevant to this Inquiry:

- Price is important but there should not be a focus solely on electricity prices. Customers are more focussed on their actual bill, than the price of their electricity.
- Tasmanians pay the highest electricity bills in the country and historically have had high bills. This reflects the high level of electricity consumption in Tasmania, which is driven by factors such as a relatively cool climate, a low penetration of natural gas and energy-inefficient housing.
- The Tasmanian Government's preoccupation with having the lowest regulated electricity prices in the country is not particularly meaningful to Tasmanian households as regulated prices are not a good benchmark for jurisdictional comparisons. Market prices overwhelmingly apply outside Tasmania.
- The Government should be more focussed on having the most affordable or most competitively-priced electricity in the country, rather than the lowest regulated prices. Energy affordability is discussed further below, under "other matters incidental thereto".
- The Government's residential price cap and approach to regulating wholesale prices was well intentioned and initially benefitted Tasmanians. It worked to protect consumers from skyrocketing prices and delivered more stable prices for customers over price cap period.
- Tasmanians' electricity bills can be reduced through a combination of lower electricity prices and lower electricity use/consumption.

Generation Prices

Tasmania's heavy reliance on older and well depreciated hydro-electric generation plant, which has a low marginal cost of production, suggests that we should have low wholesale prices. However, Tasmanian legislation links wholesale electricity prices with the Victorian wholesale price, meaning Tasmanian wholesale prices are influenced by factors in the Victorian wholesale market, not by Tasmanian costs of production.

This has exposed Tasmanian prices to the volatility in the prices of coal and gas electricity generation on the mainland, even though Tasmanian hydro-electricity generation is not impacted by the same factors. Recent wholesale price volatility in the NEM has been due to events such as the closure of the Hazelwood power station in 2017, and more recently as a result of the war in Ukraine, extreme weather events affecting coal supply and unplanned generator outages.

In 2018, the Tasmanian Government acted to guard against skyrocketing prices in the NEM by capping electricity price increases to 2%. It did this by setting the wholesale price through a Wholesale Electricity Price (WEP) Order. Included in this action was undertaking a review of the Tasmanian Wholesale Electricity Market Regulatory Pricing Framework by the Tasmanian Department of Treasury

and Finance. Upon the completion of this review and the removal of the WEP order, the Government determined not to make changes to the Framework as a result of the improved pricing environment in the NEM that saw wholesale prices falling. The Department of Treasury and Finance stated:

“The Government delinked from mainland wholesale market volatility when it was required by capping regulated power prices through a legislated wholesale electricity price order and through the use of a commercial and industrial customer rebate scheme. In the event of further volatility in mainland National Electricity Market prices in the future, the Government retains the ability to re-introduce one or both of these schemes in order to protect Tasmanian households and businesses.”¹⁸

The then Minister for Energy, Hon Guy Barnett MP, repeated this commitment to cap prices to protect households from price volatility in the Tasmanian Liberals’ 2021 state election policy:

“We have successfully de-linked from mainland wholesale market volatility through legislated, capped regulated power prices and the Commercial and Industrial rebate scheme. In the event of future volatility, we retain the ability to re-introduce one or both of these schemes in order to protect Tasmanian households and business from future price hikes.”¹⁹

It is undeniable there has been wholesale market price volatility throughout the past two years. Yet **the Tasmanian Government has not acted to cap power prices and protect households from price hikes, as it said it would.** Neither has it made the case for why it has chosen not to protect households. As a result of this inaction, Tasmanian consumers have been burdened with price hikes of 22.5% in two years.

Recommendation:

- 1. Protect Tasmanians from excessive price rises by temporarily capping electricity price increases.**

Retail Prices

Tasmanian standing offer prices are set by the Tasmanian Economic Regulator. Retail costs include operating expenses, costs to serve customers and a retail margin.

In 2022, the Office of the Tasmanian Economic Regular (OTTER) undertook a standing offer price investigation and determination process.²⁰ TasCOSS made a joint-submission with the Tasmanian Small Business Council (TSBC) that is included in Attachment 2. Our submission contended that when benchmarked with Australian Competition and Consumer Commission (ACCC) data:

- Aurora’s costs are too high and have not fallen as quickly as retailer costs on the mainland.

¹⁸ Department of Treasury and Finance (2021), [Review of the Tasmanian Wholesale Electricity Market Regulatory Pricing Framework](#), accessed 9 October 2023.

¹⁹ Tasmanian Liberals (2021), [Delivering Affordable, Reliable, Clean Energy](#), accessed 9 October 2023.

²⁰ OTTER (2022), [Standing Offer Investigation and Determination](#), accessed 9 October 2023.

- Aurora's retail margin is set too high when taking into account the local factors and risks Aurora is exposed to, as well as the advantages of being a government-owned business with dominant market share.
- As a dominant retailer, Aurora is not incentivised to be innovate or efficient and pass on savings to customers.
- Aurora should provide free access to its digital application product *aurora+*.

Our submission noted that retailer costs and margins on the mainland have been falling in recent years, whereas in Tasmania Aurora Energy's costs have been increasing. The Regulator responded by applying an efficiency dividend to Aurora each year for the next three years to account for the productivity improvements mainland retailers are achieving. Further, the retail margins of mainland retailers have reduced due to strong competition, whereas Aurora's have remained stubbornly high at more than twice the mainland average.

The current nature of Tasmania's retail market leaves customers worse off due to a lack of retail competition. Aurora is a dominant retailer with more than 94% of residential customers, all on regulated prices. In a competitive market such as on the mainland, retailers often discount the default market offer (regulated price) to gain market share. Aurora does not have a motivation to do this and as a result there is little downward pressure on retail prices from competition, leaving Tasmanian consumers worse off.

As market offers in Tasmania tend to closely track Aurora's regulated prices, reductions in regulated prices due to lower costs are likely to be matched by lower market offers, leaving all Tasmanian customers the beneficiaries, not just regulated customers.

Our submission to OTTER identified more than \$15 million in savings and efficiencies that could have flowed through to lower electricity prices for regulated customers in Tasmania, compared with Aurora's pricing proposal. The Regulator's final determination still allowed for around \$10 million in higher retail costs that TasCOSS and TSBC argued were necessary.

Green Schemes

Green schemes impact energy prices Tasmanians pay as the costs of these are passed on to customers. In Tasmania, around 9% of the total electricity bill relates to green schemes and renewable energy charges. For a typical Tasmanian customer, this equates to around \$200 per year.

Green schemes - such as the Renewable Energy Target (RET) - operate to mitigate greenhouse gas emissions and support renewables investment. They have become a feature of the Australian electricity market over the past two decades and exist at both the Federal and State Government levels.

TasCOSS does not question the value, need or importance of green schemes for encouraging investment in large and small scale renewable energy projects. But we do consider they should be funded through government budgets rather than on consumers' bills, or ensure the costs are offset for people on low incomes. The current approach of funding green schemes through power bills is highly regressive, as

the cost of these subsidies are being borne by those with the least ability pay and the least ability to invest in either energy efficiency and/or solar.

Recommendation:

2. **Shift the costs of green schemes off energy bills or offset the costs for people on low incomes.**

Any other matters incidental thereto.

Focus on Affordability, Rather than Price

The Tasmanian Government's aim is to have "among the lowest power prices in the nation."²¹ As noted above, while price is important to ensure we are not paying more than necessary for our electricity, of greater significance is having an affordable electricity supply. There are a number of elements of affordability that when addressed simultaneously with price, will result in lower electricity bills for Tasmanians:

- i. Consumption and household energy efficiency.
- ii. Capacity to pay.
- iii. Distributed Energy Resources (DER).

Tasmanians will be paying higher bills, irrespective of the price, if they have high consumption, their house is energy inefficient, they cannot access the supports available to meet their energy needs, or lack access to alternative energy sources.

i. Consumption and household energy efficiency

Energy inefficient homes are borne out in higher bills. Tasmanian consumers living in housing that is poorly-insulated, in a poor condition or running inefficient appliances, experience higher energy costs due to the need for additional heating and cooling to compensate for the heating/cooling loss.

Low income Tasmanians have little capacity to invest in energy efficiency measures that may save on their power bills. TasCOSS welcomes the Tasmanian Government's current investments to improve energy efficiency through the public housing heating and energy efficiency initiative, NILS Tasmania and the Energy Saver Loan Scheme, that will help make energy more affordable for many households. However, the suitability of these latter two schemes for most low income households is limited, particularly in terms of being able to afford repayments, taking on more debt and access for people who rent.

TasCOSS' 2021/22 Budget Priority Statement (BPS) on household energy efficiency, identified that households can lower their electricity bills by improving the energy efficiency performance of their homes. Our BPS proposed a bold investment in a range of measures to improve household energy efficiency and reduce electricity consumption.²²

²¹ Hon Jeremy Rockliff MP, [Tasmanian Liberal Government Cabinet](#), Media Release, 2 October 2023.

²² See for example TasCOSS Budget Priorities Statement 2021/22, [Household Energy Efficiency Initiatives: creating jobs, stimulating our economy and lowering power bills](#), noting revised costings would be needed.

The Commonwealth and Tasmanian Governments can make a real difference to Tasmanian household energy costs by investing in household energy efficiency upgrades of existing homes for Tasmanians on low incomes, together with minimum energy efficiency standards for rental properties.

Improving household energy efficiency and minimum energy efficiency standards will create jobs, stimulate our economy, lower emissions and help to achieve the Tasmanian Government's renewable energy goals, as well as reduce household energy bills.

It will also improve the health and wellbeing of up to 50,000 Tasmanian households experiencing energy poverty.²³

Living in energy poverty forces low income households to restrict energy consumption by avoiding basic activities like showering and using heaters, as well as resulting in high proportions of income being spent on energy and the inability to pay other bills.

Tasmanian households should not be forced to make insidious decisions when it comes to conserving energy, and by improving household energy efficiency standards across the board, households can lower their future energy consumption, save energy and lower their energy bills.

Recommendation:

- 3. The Commonwealth and Tasmanian Governments provide investment in energy efficiency, electrification and small-scale renewables for low income housing, including further investment to retrofit more social housing, help low income owner-occupiers, and support states and territories to implement minimum energy performance rental standards.**

ii. Capacity to Pay

A significant proportion of Tasmanian households experience vulnerability, disadvantage or live on low incomes and require support to pay their electricity bills. The main way Tasmanian customers on low incomes are supported to pay their energy bills, is receiving the annual electricity concession.

Concessions

TasCOSS is concerned the current concession scheme arrangements in place are not fit-for-purpose.

Currently, the energy concession is only available to around 93,000 account holders who are age pensioners, Health Care Card holders and ImmiCard holders, meaning tens of thousands of low income households that do not meet these eligibility thresholds are missing out on necessary support to lower their power bills.

²³ Bryant, D et al. 2022, [Power pain: an investigation of energy stress in Australia](#). Brotherhood of St. Laurence found up to 23% of households in Australia experienced at least one form of energy stress, equating to 50,235 households when applied to [2021 Census data](#) of 218,412 occupied private dwellings in Tasmania.

This shortcoming has been recognised by the Tasmanian Government in the design of the *Energy Bill Relief Fund* that is delivering \$500 electricity bill rebates over two years to around 140,000 customers. Eligibility is being extended beyond customers on a concession to holders of DVA Gold Cards, Commonwealth Seniors Health Cards, Family Tax Benefit A & B recipients and Carer Allowance recipients. However, while the Tasmanian Government has appropriately acknowledged an additional 47,000 customers are in need of bill relief, they do not qualify for an energy concession.

TasCOSS wrote to the Tasmanian Government last year proposing a review of the energy concessions scheme, to consider extending eligibility to all low income households and to ensure maximum support is provided to those who need it most. The review should consider the adequacy, accessibility and equity of the current energy concession scheme, as well as the potential of moving from a fixed daily rate to a payment based on a percentage of a household energy bill.²⁴ A recent report suggests across the NEM, up to 38% of eligible customers are not receiving an energy concession on their bill. The report found 19% of Tasmanian consumers with an eligible concession did not receive an energy bill discount.²⁵

Extending the electricity concession to low income households and applied as a percentage of household energy use, will have an immediate impact in providing energy bill relief to households with inadequate incomes and higher consumption.

Recommendations:

- 4. Extend eligibility for the energy concession to low income households.**
- 5. Undertake a review of the energy concession scheme to ensure it is accessible, adequate, well-targeted and equitable.**

Income Support

The biggest challenge facing Tasmanians on low incomes is the inadequacy of income support payments. Electricity prices have increased at a much faster rate than growth in government payments such as JobSeeker and other income support payments.

The single most effective and straightforward action that can be taken to improve energy affordability is to raise the income of those living below the poverty line. The rate of JobSeeker and other income support payments are inadequate to meet basic living costs. It means recipients are constantly forced to decide on a daily basis, which of the essentials they must go without.

It also means the cost of a range of related supports are shifted to other levels of government, including the Tasmanian Government, by having to fund the increased demand for services and support including food relief, energy hardship payments and additional rebates, such as Winter Bill Buster payments and the *Energy Bill Relief Fund*. Tasmanians with insufficient incomes who are unable to pay their energy

²⁴ See report [Reforming Electricity Concessions to Better Meet Need](#).

²⁵ Consumer Policy Research Centre 2022, [Mind the Gap – Identifying the gap between energy concession eligibility and concessions received](#).

bills also add additional costs to retailers, who fund customer support programs and bad debts that risk their profitability.

Lifting income support payments to reduce cost-shifting from the federal government should be a priority issue the Tasmanian Government and energy businesses to strongly advocate for.

Recommendation:

- 6. The Tasmanian Government and Tasmanian energy businesses endorse the *Raise the Rate for Good* campaign and strongly advocate for a substantial lift in income support payments, including JobSeeker and Youth Allowance, to provide people with sufficient income to access energy as an essential service.²⁶**

iii. Distributed Energy Resources (DER)

The changing nature of the electricity system through increased DER (technologies such as solar power, batteries and electric vehicles) has implications for social equity.

While there are over 40,000 homes in Tasmania that already host rooftop solar and are reducing their energy bills, there are tens of thousands of Tasmanians who are currently locked out of DER.

This particularly affects people on low incomes and renters who have little capacity to invest in DER and are therefore disadvantaged when it comes to accessing alternative energy affordability solutions, such as solar panels and battery storage. Yet they already contribute disproportionately to DER subsidies and system costs through higher bills and a higher proportion of their income on energy bills.

As the growth in DER continues, there is a risk that without significant policy and regulatory reform, the future energy market will create a two-tiered system between those who can access and afford DER and those who cannot. This will result in those without access to DER continuing to pay more for their energy, contributing to energy inequality.

Targeted policy solutions are required to encourage and support low income consumers to access alternative energy options that can shift demand and lower costs. This will ensure that those who cannot afford, or are excluded from access to, DER are not left behind.

Recommendation:

- 7. The Commonwealth and Tasmanian Governments include access to energy efficient technologies, such as solar PV, batteries and other distributed energy resources, to disadvantaged and low income households under a program of significant investment in household energy efficiency upgrades.**

²⁶ ACOSS, [Raise the Rate for Good](#).

Conclusion

A safe, reliable and affordable energy supply is critical to the health and wellbeing of Tasmanians. However, Tasmanians living on low incomes are experiencing financial pressure as a result of substantial increases in the cost of energy, without commensurate increases in income.

The combination of high energy prices, poor energy performing homes and inadequate incomes are resulting in unaffordable energy bills and energy poverty for Tasmanians. They have little option but to ration their energy use (i.e. not heating their home in the middle of winter, turning fridges off overnight, reducing showers and not cooking), entering into energy debt or paying the extra and foregoing other essentials, such as food or medicine, all of which have detrimental impacts on physical and mental health and wellbeing.

Energy prices are a key cost of living issue for Tasmanian households. TasCOSS has argued for a number of measures to reduce electricity prices in Tasmania:

- The Tasmanian Government should act to temporarily cap power prices, as it did in 2018 and said it would do again to protect households from price hikes.
- Retailer costs and margins in Tasmania are higher than on the mainland and greater efficiencies would flow through to lower retail prices.
- The cost of green schemes should be shifted off customers' bills and funded through government budgets.

While price is important to ensure we are not paying more than necessary for our electricity, of greater significance is the affordability of our energy bills. A significant proportion of Tasmanian households also experience vulnerability, disadvantage or live on low incomes, making it difficult to afford their energy bills. The single most effective and straightforward action that can be taken to improve energy affordability is to raise the income of those living below the poverty line.

Current concession arrangements are not fit-for-purpose and a review should be undertaken to consider the adequacy, accessibility and equity of the current energy concession scheme, as well as the potential of moving from a fixed daily rate to a payment based on a percentage of a household energy bill. Targeted policy solutions are also required to encourage and support low income consumers to access alternative energy options that can shift demand and lower costs.

TasCOSS also advocates for increased investment in household energy efficiency initiatives to help improve energy affordability for Tasmanian households, especially low income households. Tasmanians on low incomes have little capacity to invest in energy efficient measures that may save on power bills. The suitability of current Government energy efficiency loan schemes for most low income households is limited, particularly in terms of being able to afford repayments, taking on more debt and access for people who rent.

In the current environment of cost of living pressures and escalating electricity price increases, TasCOSS is calling for more to be done on energy prices and affordability to support Tasmanian customers and up to 50,000 households experiencing energy poverty. Tasmanians will be paying higher bills, irrespective of the price, if they have high consumption, their house is energy inefficient, they cannot access the supports available to meet their energy needs, or they lack access to alternative energy sources.

Recommendations

1. Protect Tasmanians from excessive price rises by temporarily capping electricity price increases.
2. Shift the costs of green schemes off energy bills or offset the costs for people on low incomes.
3. The Commonwealth and Tasmanian Governments provide investment in energy efficiency, electrification and small-scale renewables for low income housing, including further investment to retrofit more social housing, help low income owner-occupiers, and support states and territories to implement minimum energy performance rental standards.
4. Extend eligibility for the energy concession to low income households.
5. Undertake a review of the energy concession scheme to ensure it is accessible, adequate, well-targeted and equitable.
6. The Tasmanian Government and Tasmanian energy businesses endorse ACOSS' *Raise the Rate for Good* campaign and strongly advocate for a substantial lift in income support payments, including JobSeeker and Youth Allowance, to provide people with sufficient income to access energy as an essential service.
7. The Commonwealth and Tasmanian Governments include access to energy efficient technologies, such as solar PV, batteries and other distributed energy resources, to disadvantaged and low income households under a program of significant investment in household energy efficiency upgrades.

Attachments

Goanna Energy Consulting (2021), *Tasmanian residential electricity prices: how do they compare?*

TasCOSS/TSBC (2022), *Tasmanian Economic Regulator's 2022 Standing Offer Electricity Price Investigation*, joint response to Draft Report.