

Retail Market Policy Team

Department of Climate Change, Energy, the Environment and Water

SolarSharerOffer@dcceew.gov.au

21 November 2025

Dear Retail Market Policy Team

Re: Solar Sharer Offer Consultation Paper 2025-26

The Tasmanian Council of Social Service (TasCOSS) is the peak body for the community services industry in Tasmania. We represent the interests of our members and advocate for Tasmanians living on low incomes.

TasCOSS welcomes measures to improve energy affordability, support households and deliver system-wide benefits for energy consumers. It is, therefore, extremely disappointing that Tasmanian customers are not intended to receive the customer benefits through the current Solar Sharer Offer (SSO) proposal.

The current SSO proposal denies Tasmanian customers fair and equal access to the market benefits that customers in the DMO regions will be able to access through the SSO. If the policy intent is that the SSO could ultimately be applied consistently across Australia so that all eligible residential customers can benefit from the reforms¹, then the SSO must extend beyond the DMO regions from the outset and be designed to include Tasmania from its initiation.

Preferential treatment should not be determined by jurisdictional regulation by the AER, but rather be provided based on need. Tasmanians have the highest electricity bills in the country, the highest proportion of customers in energy debt and the lowest incomes in the country, as well as limited retail competition.

Tasmania has the highest proportion of customers on standing offers, and outside of Victoria, the highest penetration of smart meters, both of which are key features of the proposed SSO implementation approach.

¹ DCCEEW (2025), Solar Share Offer Consultation Paper, Department of Climate Change, Energy, the Environment and Water, Canberra, November, page 24.



Further, Aurora Energy – the dominant retailer in Tasmania with 93% residential market share – offers free electricity through its "Power Hours" promotion, so systems are already in place to support eligible Tasmanian customers to access schemes such as the SSO.

For these reasons, Tasmanian customers should be prioritised, not excluded, from the current SSO proposal.

Tasmanian customers will be disproportionately paying for National Electricity Market reforms such as the regulation of Basslink and Project Marinus. Tasmanians deserve to be included, not excluded, from reforms that will deliver a benefit to customers.

I urge you to ensure the design and implementation of the SSO incudes Tasmania from its initiation, rather than as a potential future add-on. Tasmanian customers must not be disadvantaged from accessing the benefits from the introduction of the SSO reform.

Yours faithfully

Adrienne Picone

Chief Executive Officer