

## Victorian Default Offer 2026–27

### Submission received via Engage Victoria on our Request for Comment paper on the 2026–27 Victorian Default Offer

#### Submission prepared by:



#### Organisation:

N/A

#### I have read and agree to the above submissions and privacy collection statement.

Yes

#### Please confirm the option which applies to your submission:

I agree to my submission (other than the information I have identified as confidential or commercially sensitive (if relevant)) being published, but please do not publish my name.

#### Date submitted:

14 November 2025

#### *General Matters*

#### Are there matters that you would like to raise, including methodological approaches to other cost components not mentioned in this paper?

Why are HWS systems mandated to charge at night and why, according to Powercor, is that impossible to change? I want my HWS to charge in the afternoon at peak solar.

#### *Wholesale electricity costs*

**We propose to continue the approach adopted in our final 2025–26 Victorian Default Offer decision to account for the wholesale cost of exports within the Victorian Default Offer. This includes a forecast export volume weighted wholesale price, multiplied by small customer export volumes, and divided by total forecast consumption. Do you agree with this approach? If not, why, and what alternative approach should we consider?**

Yes

**We propose to continue to use data sourced from the Australian Energy Market Operator and the Australian Energy Regulator to inform our estimate of the wholesale cost of exports. Do you agree with these data sources? If not, why and what alternative data sources should we consider?**

Yes

*Network costs*

**Given the objective of the Victorian Default Offer is to provide a simple, trusted and reasonably priced electricity option that safeguards consumers unable or unwilling to engage in the electricity retail market, do you foresee any difficulties in transitioning from a two-period to three-period time of use (ToU) tariff? And if not, is continuing our pass-through appropriate or are there other approaches we should consider?**

Make a clear and visible option on all offers to change HWS to afternoon charging

**Are there any other matters proposed by distribution network service providers, or the Australian Energy Regulator that you think we should consider in setting the Victorian Default Offer?**

Make a clear and visible option on all offers to change HWS to afternoon charging

*Free power period tariff*

**What are your views on the suitability of a regulated residential tariff with a free power period in Victoria?**

As long as its not offset by higher charges elsewhere and it must include the option to change HWS to afternoon charging.

**Are there additional safeguards - such as eligibility requirements - that should be implemented before a customer could opt-in to such a product?**

If Item 2 (above) is effective, this should not be necessary

*Other costs*

**Do you support our proposed approach to pass through the Australian Energy Market Operator's recently introduced 'Cyber Security & Resilience' fee and if implemented, the updated National Electricity Market Participant fee structure? If not, why, and what alternative approach should we consider?**

No. It's altogether unnecessary

**Do you have any feedback on our proposed use of the Australian Energy Market Operator's updated data to inform our ancillary service fee estimate?**

No