Department
Gold Coast campus
Griffith University, Queensland 4222
Australia
griffith.edu.au

2025 Forecast Improvement Plan

Submission to AEMO, 6 February 2026

The Centre for Applied Energy Economics and Policy Research (CAEEPR) is a collaborative partnership between Griffith Business School and energy sector participants in Australia's National Electricity Market.

CAEEPR aims to maximise the energy sector's potential to achieve emission reductions and contribute to inclusive, sustainable, and prosperous businesses and communities while building capacity in electricity economics. CAEEPR uses a national electricity market model to develop and analyse different scenarios to assess different policy positions for generator dispatch and transmission efficiency.

CAEEPR's sub aims/objectives that are most relevant to this submission:

- Supporting the transition to more sustainable and less carbon-intensive power generation and transmission system and address the accompanying policy, economic, technical and political challenges within the industry.
- Provide thought leadership and industry engagement strategies that our members can design and deliver best practice energy services with reduced emissions.
- Create and uphold advanced Electricity Market models for analysing wholesale spot and future markets, power system reliability, integration of dispatchable and intermittent resources, and network capacity adequacy.

This submission has been prepared by Andrew Fletcher who is an Industry Adjunct Research Fellow at CAEEPR. The views expressed in this submission are entirely the author's and are not reflective of CAEEPR.

For further information contact:

Andrew Fletcher | Adjunct Industry Research Fellow

Centre for Applied Energy Economics and Policy Research (CAEEPR) | Griffith Business School

Griffith University | South Bank campus | QLD 4101

andrew.fletcher@griffith.edu.au

Introduction

I welcome the opportunity to provide feedback to AEMO on the 2025 Forecast Improvement Plan. While the Forecast Accuracy Report is focussed on the accuracy of forecast drivers and models of demand and supply that influenced the reliability assessments for the 2024-25 financial year, consumer energy resources components (electric vehicles, rooftop solar PV and home batteries) are based on uptake and operating profile models that are common across AEMO modelling including the Electricity Statement of Opportunity and Integrated System Plan. While it is acknowledged that forecasting variances in these projections may have a limited impact on short term modelling, in the medium to longer-term such forecasting variances are expected to become more important as consumer energy resources grow and the electricity system transitions.

This focus of this submission is identifying areas where accuracy and transparency of how consumer energy resources operating profiles developed could be improved, including by incorporating better data. AEMO's efforts to improve CER forecasts and particularly CER solar PV generation profiles based on actual metered data is welcomed. However, AEMO is encouraged to incorporate actual data on CER solar PV and CER BESS technical parameters into its modelling so that how these resources interacts with the electricity system can be more accurately captured. This includes using actual data for battery duration assumptions and the distribution of battery sizes, not just an assumed NEM average. Network export capacity limits and the benefits of DC coupling of hybrid systems should also be captured for CER Solar PV and CER BESS. VPP and retail offerings are also evolving, with the impact of economic curtailment of CER solar PV not considered in AEMO's modelling.

Much of the relevant data should be available from AEMO's Distributed Energy Resource Register or directly from DNSPs. Thus it is likely that there is limited administration cost associated with preparing and sourcing this data. The data from the Distributed Energy Resource Register for Queensland is of suitable quality and potential data issues in other regions is not a valid reason for not improving accuracy of input assumptions for regions where quality data is available.

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1. Consumer energy resources

1.1 Distributed PV normalised generation profiles

Consultation questions – distributed PV normalised generation profiles

- *Do stakeholders support the use of metered gross distributed PV generation data to produce distributed PV generation traces?*
- *Do stakeholders see any specific risks or pitfalls in the proposed new method that AEMO should be aware of in designing the method?*
- *Do stakeholders have any other recommendations for improving the proposed new method?*

Recommendation: The use of metered gross distributed PV generation data to produce distributed PV generation traces is supported, however additional technical parameters beyond irradiance, temperature and DC to AC ratio should be incorporated to produce more accurate synthetic generation traces.

AEMO is encouraged to incorporate the following technical parameters into its modelling:

- Impacts of DC coupling with BESS. DC coupling allows a battery to be charged directly with DC electricity generated from solar modules. This eliminates inverter losses and inverter clipping resulting in greater solar generation, making DC to AC ratio of limited relevance for such a hybrid system.
- Network export capacity limits. In Queensland most connections are standard, with exports limited to 5kW per phase, with only limited uptake of dynamic connections, where exports are dynamically limited to up to 10kW per phase. While dynamic connection mandates for new connections apply in some DNSP regions, no mandate applies in Queensland.
- Virtual power plant (VPP) curtailment of solar PV. VPP such as Amber Electric automatically curtail solar PV exports when prices are negative, placing this generation behind utility scale renewables in the merit order, who typically bid in to the market at negative LGC price (potentially negative REGO post 2030) or lower. It is noted that Amber Electric claim to be winning 20% market share for new battery installations (Renew Economy, 2025), higher than AEMO's assumed current figure of 13% VPP share for CER BESS (AEMO, 2025D), thus impact could be material over time. A potential unintended consequence of including this economically curtailed rooftop solar PV generation in ISP modelling is over estimating DNSP CER augmentation. Beyond distribution network flows, AEMO is encouraged to consider whether there are other unintended consequences and whether a portion of rooftop solar PV should be modelled as price sensitive within ISP and ESOO.

Relevant data for the first two variables should be available from AEMO's Distributed Energy Resource Register or directly from DNSPs. Thus it is likely that there is limited administration cost associated with preparing and sourcing this data. The data from the Distributed Energy Resource Register for Queensland is suitable for this purpose. Potential data issues in other regions is not a valid reason for not improving accuracy of input assumptions for regions where quality data is available.

The materiality of network export capacity limit is apparent from the Green Energy Markets' CER draft projections report (Green Energy Markets, 2025) commissioned by AEMO, which states:

Readers should note that the projections below are for the solar DC panel capacity, not the capacity of inverters which convert solar panel generation into electricity that is usable by consumers. In the model we project that towards the end of the projection period new residential solar systems' average panel capacity will be close to 12kw to 16kW (it is currently at around 9kW). However, many network distributors in Australia apply restrictions on the amount of capacity inverters can export to the grid, with 5kW per phase common, although dynamic controls can allow up to 10kW. Consequently, during periods of high solar output and low household electricity demand a significant portion of the generation from the projected panel capacity will be automatically curtailed due to export constraints. While dynamic export limits are in the process of being rolled out in several states that *will allow for greater exports than 5kW, they would still act to automatically curtail output in circumstances where demand was low and aggregate solar output was very high such that voltages became too high. Furthermore, across all three scenarios it is envisaged that a substantial proportion of solar systems will be coupled with batteries which will further reduce the extent of solar DC panel capacity which is exported to the grid. This is important because the residential sector makes up the vast bulk of projected capacity under all scenarios. So, while the amount of panel capacity projected reaches high levels relative to overall electricity demand, the likely peak output that ultimately flows from inverters to satisfy electricity demand will be lower.*

1.2 Consumer Energy Resource batteries (CER BESS) operating profiles

1.2.1 Technical parameters

Recommendation: Additional *technical parameters beyond battery generating capacity (kW) and storage capacity (kWh) should be incorporated to produce more accurate CER BESS operating profiles.*

AEMO is encouraged to incorporate the following technical parameters data into the modelling of its CER BESS operating profiles:

- Actual data on inverter capacity rather than high level assumptions. Figure 1 shows that CER BESS size has more than doubled in the second half of calendar year 2025 reaching 29kWh at year end, while AEMO has assumed that battery duration remains at 2.5 hrs. Assuming an average 25kWh battery and 2.5hrs duration means 10kW battery capacity, though if on a standard connection in Queensland, exports would be limited to 5kW, which suggests an assumption of 2.5hr duration may be too low.
- Network connection export capacity and proportion of standard and dynamic connections, particularly for DNSP regions where there isn't currently a dynamic connection mandate.
- Solar panel capacity, given vast majority of batteries are part of hybrid systems.

Relevant data should be available from AEMO's Distributed Energy Resource Register or directly from DNSPs.

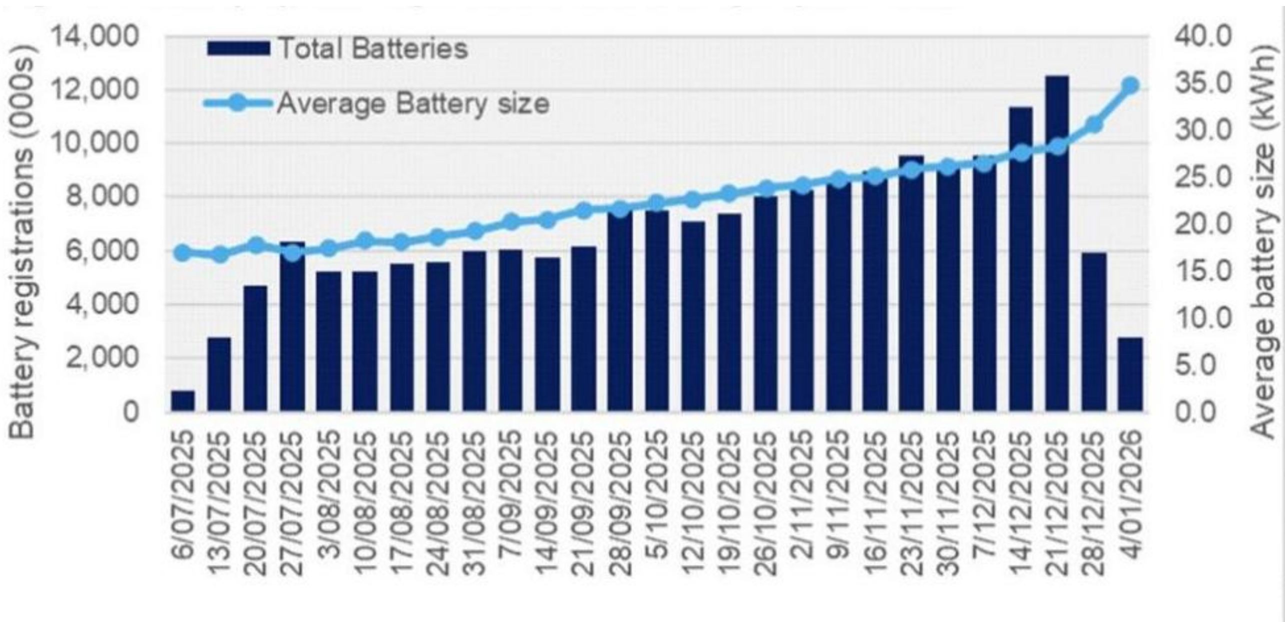

Figure 1: Battery system registration and average system size | Source: Green Energy Markets Solar Report subscription product based on Clean Energy Regulator data (Renew Economy, 2026)

1.2.2 Self-consumption CER BESS operating profiles (Solar Shift and ToU) methodology

Recommendation: Produce self-consumption CER BESS load traces based off multiple weighted samples that is representative of battery size population distribution.

Within AEMO documentation including the Electricity Demand Forecasting Methodology (AEMO, 2025C) there is limited transparency as to how AEMO models self-consumption CER BESS profiles (Solar Shift for residential and ToU predominantly for commercial customers). Correspondence with AEMO reveals that Solar Shift profiles are averaged across a number of different consumption profiles. Given the importance of CER to electricity system transition, further transparency regarding this modelling within the methodology would be welcomed.

The interaction of Solar Shift households with the electricity grid, and particularly their contribution to peak electricity system demand, will be dependent on their load, rooftop solar PV capacity and battery storage and inverter capacity. Figure 2 shows that the distribution of residential battery installation by capacity band for 2H CY2025. The distribution may be positively skewed and thus modelling Solar Shift based on mean residential battery size, rather than based on weighting multiple battery size samples, has the potential to overestimate the peak demand reduction that Solar Shift households may provide to the electricity system.

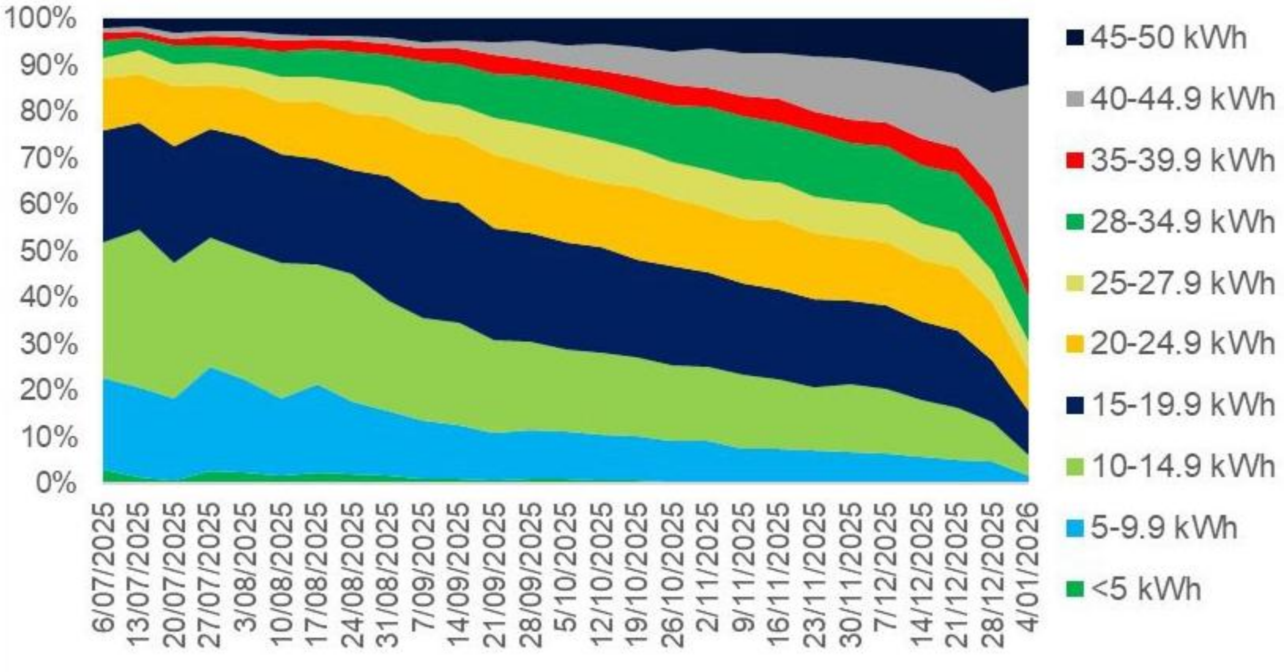

Figure 2: Battery system registrations by capacity band | Source: Green Energy Markets Solar Report subscription product based on Clean Energy Regulator data (Renew Economy, 2026)

1.2.3 Alternative operating profiles

Recommendation: Discuss potential introduction of TOU residential tariff battery operating profile in Forecasting Reference Group, prior to release of next round of CER projections.

CSIRO describes and provides market share estimates for a TOU residential tariff battery operating profile in its CER solar PV and CER BESS projections report (CSIRO, 2025B). The key difference from this operating profile compared to Solar Shift is the ability to charge from the grid in an off-peak period when solar PV production is insufficient to ensure the battery is full prior to the peak pricing period.

1.2.4 Availability factors for self-consumption CER BESS operating profiles

Recommendation: Adjust Solar Shift profiles to account for portion of battery owners being away from home.

When a resident using a Solar Shift operating profile is away from home, for instance on holiday, the reduction in household load means the battery will be poorly utilised. The resident may still be contributing to electricity system consumption and peak demand, but in a different geographic location, which should already be reflected in demand traces. Not adjusting Solar Shift for a resident availability factor has the potential to overestimate CER BESS contribution to peak demand. Such impacts are likely to be seasonal, focussed on school holidays periods and long weekends. Various data could be used to assess the extent of seasonality including metered electricity customer data and accommodation occupancy rates.

1.2.5 CER BESS VPP operating profiles

Recommendation: Amend operating profiles for Coordinated CER BESS to be similar to actual VPP operation, rather than utility scale BESS

Aggregated CER BESS and EV V2G is modelled as utility scale BESS in the ISP and ESOO, however actual VPP operating profiles are far more conservative. AEMO is encouraged to retain the approach of modelling aggregated CER BESS as part of the ISP and ESOO models (committed VPP only), but to more closely align assumptions with VPP that have an element of wholesale pool price pass through, such as Amber Electric who claim to have 40% residential VPP market share (Smart Company, 2025) and Flow Power.

To account for perfect foresight AEMO's current EESO approach is to derate VPP energy storage by 50%, compared to 25% for utility scale storage of the same duration and also applies an SRMC of $1,000/MWh for Coordinated CER BESS, per the EESO PLEXOS model. AEMO is encouraged to consider integrating the following features of Amber Electric's VPP into EESO modelling, with similar changes for the inputs to ISP modelling, to make operating profiles for Coordinated CER more realistic:

- SRMC of $150/MWh or higher for battery discharge. Amber Electric's most aggressive battery operating mode has a minimum discharge price of $100/MWh (see 3:30 of (Amber Electric, 2023)), though this appears to have increased since this video was published. For energy usage, including charging the battery using grid electricity, Amber currently charges ~3c/kWh to Queensland customers for environmental costs, market charges and price protection hedging which reduces arbitrage spread. Network energy usage charges, even with Solar soaker tariffs, further reduce arbitrage and effectively increase SRMC vs utility scale BESS
- Retain 50% storage de-rating for VPP (25% higher than equivalent duration utility scale). The 25% figure aligns with Amber Electric's 25% minimum Reserve Level, below which it will not automatically discharge to the grid (Amber Electric, 2025E). Amber Electric optimises battery operation based on forecast rooftop solar PV production, forecast energy consumption, forecast wholesale electricity prices, battery optimisation mode aggressiveness and network tariffs.

AEMO finds that a sensitivity to the Step Change scenario where no CER BESS is coordinated results in a $3.1bn increase in system cost vs the base case, which includes Aggregated CER BESS and has a $130bn present value of amortised capital cost (AEMO, 2025B). While there are expected to be system benefits from the coordination of CER BESS, the large quantum of these system cost savings, while unrealistic, demonstrate the importance of better reflecting actual VPP operation.

1.3 Electric vehicle charging load

Recommendation: Improve incorporation of seasonality into modelling of electric vehicle charging load.

The author's Draft 2026 Forecasting Assumptions Update Consultation Submission identifies potential improvements to better incorporate seasonality in electric vehicle charging loads due to both seasonality in distance travelled and variations in electric vehicle efficiency due to temperature effects on battery performance and air conditioning electricity consumption. Some potential changes may not be possible for the current report as they could require additional data and changes to the Electricity Demand Forecasting methodology.

1.4 Additional reporting of key drivers in Forecasting Accuracy Report

1.4.1 Electric vehicles

Recommendations: Disaggregate Battery electric vehicles (BEV) and plug in hybrid electric vehicles (PHEV) in Forecasting Accuracy Report.

The reporting of electric vehicles as a combined category, rather than reporting BEV and PHEV separately, misrepresents the accuracy of AEMO's forecasts. BEV and PHEV are fundamentally different vehicle types, with significant difference in electricity consumption and likely charging profiles (though limited data currently exists). Given the future size of projected PHEV load, high levels of uncertainty, including driven by policy uncertainty regarding fringe benefit tax exemptions on BEV novated leases and limited availability of charging profile data, more granular reporting is recommended including so that drivers of forecast variance can be better tracked and explained.

Previous CSIRO projections did not anticipate a meaningful role for PHEV, whose sales have grown significantly over the past 2 years. This forecasting variance has been addressed in the Draft 2025 Electric projections, which incorporates growth in PHEV and a niche long term role for PHEV (CSIRO, 2025A).

Fuel Type	Q3 2023	Q4 2023	Q1 2024	Q2 2024	Q3 2024	Q4 2024	Q1 2025	Q2 2025	Q3 2025
ICE	81.20%	82.00%	78.16%	75.47%	74.17%	75.05%	72.37%	72.03%	69.65%
BEV	7.43%	7.07%	8.72%	8.10%	6.59%	7.42%	6.29%	9.31%	9.70%
Hybrid	10.31%	9.46%	11.95%	14.93%	16.70%	14.90%	16.52%	14.87%	16.52%
PHEV	1.05%	1.47%	1.17%	1.49%	2.53%	2.63%	4.82%	3.79%	4.12%
Hydrogen	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Figure 3: Vehicles sales by type | Source: Australian Automobile Association, data courtesy of Federal Chamber of Automotive Industries and Electric Vehicle Council

1.4.2 CER BESS

Recommendation: Include CER BESS in Forecasting Accuracy Report.

While information on forecast accuracy of Rooftop PV and PVNSG are included in the report, no such information is included for CER BESS. From a small base CER BESS experienced rapid growth in the second half of calendar year 2025, driven by the Commonwealth Government's Cheaper Home Battery Program. There is a high degree of forecasting uncertainty regarding short term CER BESS uptake, including due to the impacts of recent changes to the Commonwealth Government's Cheaper Home Battery Program (Solar Quotes, 2025).

2. Modelling unexplained consumer behaviour trends

Consultation questions – modelling otherwise unexplained consumer behaviour trends

- *Do stakeholders support the increased analysis of customer meter data to identify and characterise emerging consumer behaviour trends?*
- *Do stakeholders have a view on any specific consumer behaviour trends worthy of priority investigation?*

Recommendation: Increased analysis of customer meter data to identify and characterise emerging consumer behaviour trends is supported, particularly relating to CER, market share of retail Time of Use retail tariffs and VPP.

2.1 Battery electric vehicle (BEV) charging

Recommendation: Actively monitor BEV research for the occurrence of inter day shifting of battery electric vehicle charging load to match rooftop solar PV production and/or wholesale electricity prices

With the exception of Vehicle to Grid, which is available on a limited range of vehicles and/or has limited manufacturer warranty support and requires higher cost reversible charges to be installed, this behaviour is not captured by AEMO modelling. Price signals exist to encourage such behaviour and recent literature which supports that some consumers may embrace inter-day shifting of EV charging load includes:

- Orchestration of EV charging is available through the Amber Electric VPP for Tesla vehicles using Type 1 and Type 2 chargers (Amber Electric, 2025A). Charging optimisation options include charging using excess solar once a home battery is full or charging based on electricity usage price (wholesale price + network charge + other variable charges). Early trial data (supported by ARENA) found that 70% of enrolled Tesla customers were using an excess solar offering (Amber Electric, 2025B). Charging based on the electricity usage price can be scheduled with charging occurring at or below a selected maximum charging price, while a higher recovery charging price can be set once state of charge falls below a selected % (Amber Electric, 2025B). While unlikely to be representative of a future EV owner population, April 2025 to October 2025 Amber electric data showed that 979 out of 1,595 customers charged less than 33% at night (Amber Electric, 2025C), with this customer group likely to be most relevant for inter-day shifting. Customers with total weekly charging under 60kwh per week (3,120kWh pa, 17,333km pa assuming 0.18 kWh/km[1]), had a median weekly charge of 34.31kWh (1,784kWh pa assuming 9,912km) with under 33% of charging at night accounted for 685 customers, 43% of total. Given Tesla vehicles typically have higher efficiency than other BEVs (RACV, 2025), such that CSIRO's/AEMO's assumption of 0.18 kWh/km may not be representative, the median estimated figure of 9,912km compares relatively well to the 11,100km assumed by CSIRO in electric vehicle projections (AEMO, 2025A) .

[1] (AEMO, 2025A)

Figure 4: 'Time of Day' and 'Total Weekly Chargin' Impact Price Paid for charging (c/kWh)

Source: (Amber Electric, 2025C)

- (Lim, Philip, Nauze, & Whitehead, 2024) tracked 643 Australian Teslas between November 2021 and March 2024, analysing 301,926 charging events across different states and finds that as Tesla drivers become more experienced charging becomes less frequent, with higher charge per session. This reduction points to a reduction in range anxiety with experience, which allows more optimised charging behaviour (Amber Electric, 2025D).
- Research by Recurrent (Recurrent, 2024) implies that EV owners have some flexibility to manage state of charge levels where disincentives exist. Charging NMC batteries above 80% leads to materially higher degradation than for LFP and Recurrent research (Recurrent, 2024) shows that the distribution of EV state of charge is related to battery chemistry, with State of charge for non LFP EVs (typically NMC) lower than LFP EVs.

2.2 Plug in hybrid electric vehicle (PHEV) charging profiles

Recommendation: Actively monitor PHEV research in order to refine weightings for PHEV charging profiles

While limited data exists to support weighting for PHEV charging profiles, harmonising these weightings with BEV lacks intuitive appeal. (Rose, 2026). Given smaller battery sizes of PHEV it is hypothesised that overnight charging will be more common than BEV, where for BEV owners with type 2 chargers, charging during solar PV producing hours on the weekend or a work from home day may be suitable option. For instance a LinkedIn post (Rose, 2026) highlights a PHEV owner's charging behaviour for a family with 2 vehicles (one PHEV and one ICE):

- PHEV is charged overnight at 8c/kWh using AGL's EV Night Saver EV tariff (AGL, 2026).
- PHEV is preferred for driving over the ICE vehicle due to lower energy costs, resulting in lower milage for ICE vehicle.

2.3 Other potential rebound effects

AEMO electricity demand forecasting includes rebound effects for electric vehicle projections (CSIRO, 2025A), rooftop solar PV investments and energy efficiency savings (AEMO, 2025C).

2.3.1 CER BES

Recommendation: Actively monitor whether installation of CER BESS leads to increase in consumption by consumers, in a similar fashion to the solar round effect

This is particularly the case as the structure of the Cheaper Home Batteries Program has led to average system size being materially higher than needed for self-consumption, as discussed in the author's 2026 Forecasting Assumptions Update Consultation Submission. This means that for customers with CER BESS not participating in VPPs there may typically be limited cost in increasing electricity consumption, for instance running air conditioning more frequently or at lower (summer) or higher temperature (winter), or air conditioning more rooms. For many consumers this may result in change of behaviour that is unrelated to battery charge levels. While this potential additional demand may have limited impact on the electricity system in typical periods, impact on peak summer days, particularly where there is cloudy weather, is less certain.

2.3.2 Solar Sharer Offer Retail Time of Use Tariffs with zero or low middle of the day price periods

Recommendation 1: Actively monitor whether implementation of Solar Share Offer (3hrs free electricity) and similar retailer product offerings not only lead to shifting load to this lower price period, but also increases consumption, particularly air conditioning

Per discussion in 2.3.1 this could lead to an increase in consumption, particularly relating to air conditioning use, as identified by Energy Queensland (Energy Queensland, 2025) and Origin Energy (Origin Energy, 2025) in their respective Solar Sharer Offer Consultation submissions.

Recommendation 2: Actively monitor whether implementation of Solar Share Offer (3hrs free electricity) and similar retailer product offerings has an impact on the uptake of electric resistive hot water vs heat pumped hot water and thus impact on energy efficiency projections

Low cost or free electricity erodes the efficiency advantage of heat pumps, which have higher capex, even after subsidies and shorter warranted lives than resistive electric hot water.

Recommendation 3: Actively monitor whether implementation of Solar Share Offer (3hrs free electricity) accelerates trend of controlled load reducing in Queensland driven by rooftop solar PV uptake

While not a rebound effect, hot water-controlled load (typically runs overnight) has reduced over time in Queensland as customers have installed rooftop solar PV and put resistive electric hot water on timers to run during solar producing hours. The Solar Sharer Offer provides a similar financial incentive to shift resistive electric hot water to a primary tariff and install a hot water timer.

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