

**PUBLIC UTILITIES
REGULATORY COMMISSION**



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Transitioning to Time-of-Use (TOU)
Electricity Tariffs in Ghana:
Regulatory and Policy Imperatives
for Households and Businesses

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KEY HIGHLIGHTS

- The foundational conditions required for the implementation of Time-of-Use (TOU) tariffs in Ghana are sufficiently in place to support a structured and phased transition.
- The remaining barriers to TOU tariffs adoption are regulatory and institutional in nature, centered on tariff design, implementation pathways, consumer education and protection, and inter-agency coordination.
- Consumer protection, specifically lifeline provisions, bill shock mitigation measures, treatment of shared-meter households, and sustained consumer education is central to a successful TOU tariff reform.
- Businesses require a differentiated and supportive policy environment, where TOU tariffs are aligned with industrial competitiveness goals and complemented by access to energy management tools, financing for efficiency upgrades, and transitional support for SMEs.
- The regulator's role is crucial. PURC is required to establish clear TOU tariffs guidelines, oversee phased implementation, monitor bill and revenue impacts, and coordinate stakeholder engagement to ensure the transition remains efficient and socially balanced.

1. Introduction

Ghana's electricity tariff reform has reached a crucial implementation stage for Time-of-Use (TOU) pricing. The debate is no longer about if TOU tariffs should be adopted, but how. Building on a foundational PURC-led study on consumer acceptance of TOU electricity tariffs structure in Ghana¹ (see also the January 2026 issue of the Regulatory Brief), the focus must now shift from analysis to regulatory action.

However, a nationwide rollout of TOU tariffs in Ghana presents significant challenges given the diverse nature of Ghana's electricity consumers. For households with varying income levels, consumption patterns, housing conditions, types of electrical appliances used, and limited control over energy use, especially for lifeline consumers and those on shared meters, this calls for carefully designed consumer protection and affordability

measures, which are essential for the prevention of any adverse impacts (Borenstein, 2005; Darby, 2010). Similarly, while large industrial users are well-positioned to benefit, small and medium-sized enterprises (SMEs) often face financial and operational constraints that limit their ability to adjust, hence, requiring transitional support (Faruqui and Sergici, 2010; PURC et al., forthcoming 2026). Understanding these differences is critical to informing the design of phased implementation pathways, transitional measures, and targeted communication strategies that reduce the risks of bill shocks, support competitiveness, and strengthen public trust in tariff reforms (Darby, 2010). Navigating these complexities is also important, especially as the reform aligns with national objectives such as Ghana's 24-hour economy agenda.

¹ See PURC et al. (forthcoming, 2026). Consumer Acceptance of Time of Use Tariff Structure in Ghana: Evidence from a Discrete Choice Experiment

This regulatory brief therefore provides a practical policy framework to guide the Commission and its stakeholders through the transition from TOU readiness to TOU implementation. It moves beyond the established benefits of TOU pricing to offer specific, actionable recommendations tailored to two distinct groups: households and businesses. For each, the brief outlines key policy imperatives, including: equitable tariff design and consumer protection mechanisms; transitional support and mitigation of bill shocks; and targeted communication and stakeholder engagement strategies. The objective is to ensure that the implementation of TOU tariffs in Ghana is not only technically efficient but also socially responsive and economically supportive for all.

Consistent with the foregoing, this brief provides a clear roadmap for the successful implementation of TOU tariffs in Ghana by:

- a. Outlining the necessary policy and regulatory actions required to drive the transition;
- b. Identifying the distinct transition implications for households and businesses;
- c. Recommending phased and tailored implementation pathways for both households and businesses that minimize transition risks and bill shocks; and
- d. Proposing policy and regulatory measures to protect vulnerable consumers while ensuring the reform does not compromise system efficiency or the financial sustainability of the utilities.

The brief adopts a policy and regulatory analysis methodology, and builds on the findings of the referred PURC-led empirical study. It focuses on translating the findings from the study into actionable regulatory and policy guidance. The methodology also reviews the literature on dynamic pricing and its operational implications for households and businesses, and identifies regulatory gaps, implementation requirements, and transition risks to inform the design and implementation pathways for TOU tariffs in Ghana.

Against this background, the discussion begins by examining why Ghana must now move decisively from TOU readiness to active transition.

2. Why Ghana Must Move from TOU Readiness to TOU Transition

Ghana must now move from TOU readiness to active transition because the foundational conditions for implementation have been established. The literature identifies several foundational conditions for implementing TOU tariffs. The first is the availability of advanced metering and communication infrastructure, given that TOU tariffs require hourly or sub-hourly data to accurately measure usage and apply time-differentiated prices (Faruqui and Sergici, 2010; Faruqui et al., 2014). In Ghana, electricity distribution utilities are progressively investing in smart and advanced metering infrastructure, while also strengthening the digital backbone required to support any tariff reform. This progress is reinforced by the adoption of digital and mobile billing platforms, such as the Electricity Company of Ghana's Power App, which enhances billing transparency, customer access to consumption information, and readiness for more granular tariff structures.

Closely related to advanced metering is the need for robust utility billing, data management, and IT systems capable of processing high-frequency meter data, generating transparent bills, and protecting customer data (McKenna et al., 2012; Albert and Rajagopal, 2013; Torriti, 2012). Ghana's electric utilities have made notable advances in this area through the deployment of integrated billing platforms and mobile payment systems, which provide a practical foundation for transitioning from the prevailing tariffs structure to TOU pricing. In addition, PURC has established its own data management system, and the planned second phase is intended to integrate the Commission's platform with utility systems. This integration will enhance regulatory oversight by enabling more timely access to consumption and billing data, improving monitoring of tariff impacts, strengthening consumer protection through better complaint resolution and bill verification, and supporting evidence-based tariff reviews and adjustments during TOU implementation.

A clear and enabling regulatory framework is another essential condition necessary to implement TOU tariffs, approve tariff structures and time

bands, and to provide consumer protection mechanisms (Bhagwat and Hadush, 2020). In this regard, the PURC has the statutory mandate and institutional capacity to develop and issue the necessary regulatory framework and guidelines to support TOU implementation within a relatively short timeframe, building on its existing tariff-setting processes and regulatory instruments.

Beyond infrastructure and regulation, the literature further emphasises the importance of consumer engagement and equity considerations in TOU implementation. As noted by some scholars such as Faruqui and Sergici (2010), Darby (2010), Frederiks et al. (2015) Torriti (2012), and Fell et al. (2015), clear communication, simple tariff design, and lifeline or social considerations for vulnerable consumers are essential to encourage behavioural responses and to minimise bill shocks. In Ghana's case, part of PURC's mandate is to undertake routine and structured consumer engagement activities nationwide through its various regional offices. Thus, when TOU implementation is finally initiated by PURC, communication on TOU tariffs can be embedded intentionally within these existing engagement platforms. This will allow for sustained consumer education, feedback, and trust-building as part of normal regulatory practice rather than as a one-off intervention.

The remaining challenges now relate to how TOU tariffs should be structured, phased, and administered within the existing tariff framework, as well as how responsibilities should be coordinated among the technical and economic regulators and the distribution utilities. In addition, extensive stakeholder engagement will be required to support Ghana's adoption of TOU pricing and ensure a smooth transition. Going ahead, the design, engagement, coordination and implementation issues fall squarely within the regulator's mandate.

2.1 Regulatory Leadership and the Risks of Implementation Delay

The principal risks with the regulator concerns policy hesitation and delays in issuing the appropriate guidelines and regulatory frameworks necessary to operationalise TOU tariffs. International regulatory experience indicates that once a credible evidence base has been established (as is the case of the comprehensive study led by PURC), then

prolonged postponement of implementation can weaken reform credibility, reduce stakeholder confidence, and allow inefficient pricing structures to persist by default. Such delays may also increase transition costs over time, as utilities continue operating under pricing arrangements that do not fully support system optimisation or demand-side response (Faruqui et al., 2014). Moving forward therefore requires regulatory leadership and policy alignment to convert readiness into structured implementation. It is also important to ensure that the findings identified in the evidence phase are realised through deliberate and coordinated action rather than deferred by institutional hesitation. Therefore, at this stage, the policy question is no longer whether TOU tariffs should be pursued, but how they should be introduced in a structured and credible manner. The next section examines the key regulatory choices and policy imperatives that will guide Ghana's transition to TOU tariffs.

3. Regulatory Choices and Policy Imperatives for TOU Transition

With the evidence base on feasibility and consumer response established, the key regulatory question is whether TOU tariffs should be mandatory or optional, and for which customer classes. Evidence from the PURC-led study indicates that industrial consumers show the strongest readiness and economic motivation to respond to TOU price signals, while commercial and residential classes show more varied capacity and flexibility to shift demand. This supports a phased or priority introduction beginning with industrial users, with more gradual or flexible approaches for other customer groups. This pattern is consistent with other regulatory experiences, which finds that large users are typically more responsive to time-differentiated pricing and therefore are suitable early entrants in TOU implementation (Faruqui and Sergici, 2010).

Closely related, as discussed by Faruqui and Sergici (2010), Darby (2010), and Torriti (2012), is the need for a phased implementation pathway that aligns rollout with utility readiness and consumer preparedness, to reduce transition risks and enable learning and adjustment. Introducing TOU tariffs

in stages; that is by customer class, geography, or pilot groups will enable the Commission to match implementation with the availability of metering infrastructure, billing system capability, and data management capacity within the distribution utilities. Findings from Dutta and Mitra (2017) indicate that pilot implementations of dynamic pricing can encourage consumer responsiveness and contribute to reductions in electricity bills. Phased introduction through pilots also reduce operational risks such as billing errors, system overload, or customer confusion during the early stages. At the same time, it also allows consumers the time to understand the tariff structure, adjust usage behaviour, and build confidence in the new pricing system. A gradual approach also creates opportunities for learning, monitoring, and course correction. This enables the regulator to observe behavioural responses and refine time bands, communication strategies, and consumer protection measures before full-scale rollout, as emphasised in the literature on TOU and dynamic pricing implementation (Torriti, 2012; Faruqi and Sergici, 2010).

The PURC must also balance cost reflectivity with social protection. While TOU pricing improves efficiency by reflecting time-based system costs, regulators are expected to embed consumer protection considerations for vulnerable households, to ensure equitable outcomes (Borenstein, 2005; Fell et al., 2015). Borenstein (2005) also argue that revenue adequacy and revenue volatility effects are not uniform across distribution utilities, as utility-specific load profiles, customer mix, and consumption patterns influence how TOU tariffs affect financial outcomes. This observation aligns with the findings of PURC's study. Consequently, PURC will need to apply utility-specific oversight and calibrated adjustments to maintain financial sustainability during the transition.

These regulatory choices translate into clear policy imperatives. The PURC must take the lead in establishing the regulatory architecture for TOU implementation by issuing detailed regulations and guidelines that define tariff structures, time bands, customer classes, and implementation procedures. This should also include embedding social

protection considerations within tariff approvals, maintaining and refining lifeline provisions, and specifying consumer protection mechanisms to protect vulnerable households during the transition. This regulatory direction will provide predictability for utilities and consumers, reduce uncertainty and strengthen confidence in the reform process.

A further policy imperative is the need for structured and continuous stakeholder engagement led by PURC. The transition to TOU tariffs affects households, businesses, utilities, consumer groups, and sector institutions. This means that early consultation and ongoing dialogue is essential for legitimacy and effective implementation (Jenkins et al., 2018). Stakeholder engagement will help clarify tariff design features, manage expectations, and build shared understanding of how TOU pricing works in practice. From a regulatory perspective, stakeholder engagement reduces implementation risk by building trust, clarifying policy intent, improving compliance, and reducing resistance during reform processes (Reed, 2008). It will allow PURC to identify potential consumer protection gaps, operational constraints within utilities, and adjustment challenges faced by consumers before full rollout. Stakeholder engagement will also help strengthen transparency and trust, which are critical for reforms that directly affect consumer bills.

4. Policy Imperatives for Households

This section examines the core policy imperatives required to ensure that household participation in TOU tariffs is equitable, well-informed, and aligned with broader regulatory objectives. Households vary significantly in their ability to shift electricity consumption due to differences in income levels, appliance ownership, housing arrangements, and daily energy-use routines. Evidence from the literature and regulatory practice therefore underscores that TOU implementation must be accompanied by targeted measures to address affordability and behavioural constraints, to avoid disproportionately burdening vulnerable consumers (Borenstein, 2005). These distributional considerations make consumer protection a central pillar of effective TOU tariff design and implementation.

4.1 Protecting Lifeline Consumers and Managing Household Transition Risks

A key policy imperative relates to the treatment of lifeline consumers, vulnerable households, and customers under shared metering arrangements. Within a TOU framework, maintaining, and where necessary refining, lifeline tariff provisions is essential to prevent unintended increases in electricity costs for households whose consumption is already limited to basic needs. Equity-oriented regulation therefore requires systematic monitoring of distributional impacts, including mechanisms to track bill changes among low-income and vulnerable households, enabling early identification of adverse outcomes and timely corrective interventions (Fankhauser and Tepic, 2007; Fell et al., 2015). Such interventions may include temporary bill protection measures, targeted subsidies, or adjustments to lifeline thresholds during the transition period.

Attention is also required for households connected through shared or compound meters, which remain common in Ghana. In these arrangements, individual consumers often lack direct control over appliance use and consumption timing, significantly limiting their ability to respond to TOU price signals. Empirical and anecdotal evidence suggests that consumers without control over load management or access to enabling technologies face structural constraints that reduce responsiveness to dynamic pricing (Darby, 2010; Faruqui and Sergici, 2010). Consumer protection measures should therefore consider alternative metering or sub-metering solutions where feasible, provide clear regulatory guidance on the treatment of shared-meter customers under TOU tariffs, and ensure ongoing monitoring of bill impacts for these consumer groups.

4.2 Managing Bill Impacts During the TOU Transition

Managing bill impacts during the transition to TOU tariffs is another critical policy priority. While TOU pricing is intended to improve allocative efficiency and better reflect system costs, consumers typically evaluate tariff reforms based on short-term bill

outcomes rather than long-term system benefits (Faruqui and Sergici, 2010; Darby, 2010). Sudden or poorly understood changes in electricity bills can therefore undermine public confidence and generate resistance, even where reforms are economically sound. Managing perceived and actual bill impacts is thus central to the success of TOU implementation.

The literature on dynamic pricing consistently highlights the importance of transitional mechanisms to support gradual household adaptation. Phased implementation, through pilots, voluntary participation, or selective customer rollouts, allows regulators and consumers to learn and adjust before full-scale deployment. Shadow billing, whereby consumers receive information comparing their existing bills with hypothetical TOU bills prior to formal implementation, has been shown to improve understanding and reduce anxiety by providing advance visibility of potential bill impacts (Faruqui and Sergici, 2010).

In addition, clear disclosure of peak, shoulder, and off-peak periods, supported by simple billing formats, tariff calculators, and usage summaries, helps households understand how behavioural adjustments translate into cost outcomes (Darby, 2010; Torriti, 2012; Fell et al., 2015). Regulatory experience further indicates that temporary bill protection measures, such as caps on year-on-year bill increases, opt-out provisions, or guaranteed bill neutrality during initial periods, can provide an effective safety net. For example, the UK energy regulator, Ofgem, and the California Public Utilities Commission (CPUC) both incorporated transitional safeguards and opt-out mechanisms during TOU rollouts to ease consumer adjustment and limit resistance. These approaches are consistent with broader regulatory practice and research, which recognise transitional protections as essential tools for managing bill-shock risks and sustaining consumer confidence (Faruqui et al., 2014; Fell et al., 2015; Nicolson et al., 2018).

4.3 Consumer Education, Simplicity, and Trust-Building

Consumer education and trust-building are fundamental to the effective adoption of TOU tariffs.

Experience across jurisdictions demonstrates that households are more likely to respond positively to time-differentiated pricing when they understand how the tariff operates, how their behaviour affects their bills, and what practical actions they can take to manage costs (Darby, 2010). With this understanding, TOU tariffs risk being perceived as complex, punitive, or opaque, thereby weakening participation and reducing demand-response benefits.

A central policy priority is therefore simplicity in tariff design and communication. Time bands, price differentials, and billing formats should be intuitive, consistent, and visually clear, with straightforward explanations of peak, shoulder, and off-peak periods. Evidence suggests that consumers engage more effectively when technical data are translated into actionable insights, such as highlighting the cheapest times to use electricity or illustrating the cost implications of alternative usage patterns (Darby, 2010). Digital platforms, mobile applications, in-home displays, and SMS alerts can further strengthen engagement by providing timely consumption feedback and reinforcing behavioural learning.

Trust-building before, during, and after TOU implementation is equally important. Consumers are more receptive to tariff reforms when they perceive regulators and utilities as transparent, responsive, and acting in the public interest (Devine-Wright et al., 2007; Darby, 2010). Accordingly, TOU awareness and education should be embedded within routine consumer engagement channels, including community outreach programmes, radio discussions, stakeholder forums, and complaint-resolution platforms. This helps normalise the reform and frames it as part of ongoing regulatory engagement rather than a one-off intervention.

Targeted outreach to specific consumer groups, particularly low-income households and those with limited digital access, is also essential to ensure inclusivity. Providing information in local languages, using practical and relatable examples, and partnering with community-based organisations can significantly enhance understanding and trust. Collectively, these measures support informed participation, protect vulnerable households, and strengthen confidence in TOU tariff reform as a

fair and credible component of Ghana's electricity pricing framework.

5. Policy Imperatives for Businesses

The transition to Time-of-Use (TOU) electricity tariffs presents clear opportunities for businesses to reduce energy costs, but it also requires adjustments to operational practices. Regulatory design must therefore balance efficiency objectives with the need to support business competitiveness. As noted by Faruqui and Sergici (2010) and Torriti (2012), effective tariff reform must recognise the heterogeneity of business consumers and adopt differentiated approaches that reflect variations in load profiles, operational flexibility, and cost sensitivity across industrial, commercial, and small and medium-sized enterprises (SMEs).

Empirical evidence indicates that large industrial consumers tend to be more responsive to TOU pricing, owing to higher electricity intensity and greater capacity to reschedule production processes. In contrast, smaller commercial enterprises and SMEs often face operational constraints that limit their ability to shift load across time periods (Faruqui and Sergici, 2010). A key policy imperative is therefore to support operational flexibility and competitiveness, particularly for firms with limited adjustment capacity. This requires complementary measures, including improved access to energy management information, automation technologies, and advisory support to help businesses understand and respond effectively to time-differentiated price signals (Faruqui et al., 2014; Torriti, 2012). Regulatory and policy frameworks should thus encourage the adoption of energy-efficient equipment, smart controls, and storage solutions that enable firms to optimise operations under TOU tariff structures.

At the same time, regulators should adopt phased and differentiated implementation approaches that reflect differences in load characteristics and adjustment capacity across business categories. Government and utilities have a complementary role in facilitating enabling investments, digital tools, and targeted support programmes that allow firms to adapt to TOU pricing without undermining productivity or competitiveness (Faruqui et al.,

2014; Torriti, 2012).

TOU tariffs also provide market-based signals that encourage firms to schedule energy-intensive activities during lower-cost periods, contributing to smoother demand profiles and more efficient utilisation of system capacity (Faruqui et al., 2014). For industries capable of operating beyond conventional daytime schedules, TOU pricing can catalyse expanded output without proportionate increases in system strain. These characteristics give TOU tariffs broader policy relevance beyond pricing reform. Accordingly, TOU should be viewed not only as a tariff instrument, but also as a tool of economic and industrial policy. Regulatory design must ensure clear and predictable time bands and sufficiently differentiated price signals that reward productive load shifting. Alignment with complementary national initiatives, such as the 24-hour economy policy, can enable businesses to expand production at lower energy costs while supporting wider economic development objectives.

Further, aligning TOU tariffs with industrial policy and investment incentives is essential to enable firms to convert price signals into sustained productivity gains (Fleiter et al., 2012). This requires coordination between tariff reform and policies that promote industrial growth, export competitiveness, and technological modernisation. Incentive schemes, financing mechanisms, and targeted tax measures that support investments in energy management and automation can reinforce TOU pricing and enhance its contribution to national economic objectives (Faruqui et al., 2014).

Findings from the PURC-led study indicate that commercial enterprises and SMEs may experience short-term adjustment pressures following the introduction of TOU tariffs, particularly where operational flexibility is limited. This is consistent with the broader literature (Faruqui and Sergici, 2010; Torriti, 2012; Fell et al., 2015; Nicolson et al., 2018). Regulatory practice therefore underscores the importance of transitional support measures, including phased implementation, targeted information campaigns, and advisory services,

to ensure that smaller firms can adapt without disproportionate financial strain. Additional measures, such as simplified billing formats and enhanced consumption feedback tools, can further support SMEs in understanding and responding effectively to TOU pricing structures (Darby, 2010).

6. Policy Recommendations

6.1 Recommendations for PURC

The following recommendations outline the priority regulatory actions required of the Public Utilities Regulatory Commission (PURC):

- a. Develop and publish clear regulatory guidelines on TOU tariff structures, applicable time bands, customer segmentation, and mandatory consumer protection requirements.
- b. Adopt a phased and differentiated rollout strategy, prioritising large industrial customers for early implementation, while applying gradual, optional, or pilot-based approaches for residential consumers and small and medium-sized enterprises (SMEs).
- c. Maintain lifeline tariffs and actively monitor bill impacts on vulnerable consumers, complemented by transitional measures such as shadow billing, bill comparison tools, and enhanced customer notifications.
- d. Monitor revenue adequacy and load impacts on a utility-by-utility basis, and permit calibrated tariff or design adjustments to safeguard financial sustainability during the transition period.
- e. Mandate standardised, transparent billing formats, including clear disclosure of applicable TOU periods and rates for each customer category.
- f. Institutionalise continuous public education and stakeholder engagement, leveraging routine consumer engagement platforms before, during, and after TOU implementation.
- g. Undertake periodic regulatory reviews of TOU outcomes, assessing impacts on demand patterns, consumer bills, and utility revenues to inform evidence-based refinements.

6.2 Recommendations for Government/Policy Makers

The following recommendations outline the priority policy actions required of policymakers:

- a. Formally recognise TOU tariffs as an integral component of broader electricity sector reforms and national economic transformation strategies.
- b. Support sustainable financing mechanisms for the deployment of advanced metering infrastructure, digital systems, and data platforms necessary for effective TOU implementation.
- c. Integrate TOU-related incentives with initiatives supporting the 24-hour economy policy, industrial competitiveness, and productivity enhancement across key sectors.
- d. Facilitate access to credit facilities, tax incentives, and concessional financing for businesses investing in energy management systems, automation, and electricity storage solutions.
- e. Coordinate with the PURC to ensure the availability of targeted assistance and mitigation mechanisms for vulnerable households that may experience adverse tariff impacts.

6.3 Recommendations for Distribution Utilities

- a. The following recommendations outline the priority investment actions and operational measures required of distribution utilities:
- b. Accelerate the nationwide deployment of smart and advanced metering infrastructure to enable accurate measurement of time-differentiated consumption.
- c. Upgrade billing and data management systems to ensure the reliable processing of TOU data and the production of clear, transparent, and comprehensible customer bills.

- d. Provide digital platforms, mobile applications, and periodic usage reports to support consumer understanding of consumption patterns and enable effective management of electricity use under TOU tariffs.
- e. Collaborate with the PURC on consumer education campaigns, customer support arrangements, and complaint resolution mechanisms throughout the transition period.
- f. Continuously monitor and assess changes in load profiles and revenue performance, and submit regular reports to PURC to support evidence-based, adaptive regulation.

7. Conclusion and Next Steps

The transition to TOU electricity tariffs represents a necessary next phase in Ghana's tariff reform agenda. With the evidence base established and key foundational conditions in place, the immediate priority is to advance extensive stakeholder engagement, develop clear and robust regulatory guidelines, ensure structured implementation, and strengthen consumer protection mechanisms. This brief therefore serves as a bridge between evidence and rollout, translating analytical findings into practical regulatory and policy actions for both households and businesses.

Going forward, TOU implementation should be treated as an iterative regulatory process. Continuous monitoring of bill impacts, demand responses, and utility financial performance will enable periodic refinements to tariff design, time bands, and consumer safeguards as implementation experience deepens. Such an adaptive approach is essential for TOU tariffs to mature into a sustainable and integral component of Ghana's electricity pricing framework.

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