

IRAS e-Tax Guide

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1 Aim

1.1 This e-Tax Guide¹ explains the GST treatment relating to the supply of electricity in the retail market under the en-bloc electricity purchase arrangement in the National Electricity Market of Singapore.

2 At a glance

- 2.1 Under the en-bloc electricity purchase arrangement, the licensed electricity retailer sells electricity to the landlord of a building or Management Corporation Strata Title (MCST) with a master-metered account (i.e. master-metered consumer). The landlord / MCST in turn sells electricity to the tenants / unit owners (i.e. sub-metered consumers).
- 2.2 The GST-registered electricity retailer needs to charge the master-metered consumer GST on all the electricity used in the entire building. Subsequently, the GST-registered master-metered consumer needs to charge GST to each sub-metered consumer on the portion of the electricity used by them.
- 2.3 While the retailer may issue invoices and collect payment on behalf of the master-metered consumer from the sub-metered consumers, the master-metered consumer is still liable to account for GST on the portion of electricity charged to the sub-metered consumers in its GST returns.

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This e-Tax Guide replaces the IRAS' e-Tax Guide on "GST Treatment on the Supply of Electricity" published in Feb 2006.

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3 Background of En-bloc Electricity Purchase Arrangement

- 3.1 With the liberalisation of the electricity retail market, contestable² consumers at non-residential premises have a choice of buying electricity from any of the licensed electricity retailers³ or from the wholesale electricity market⁴.
- 3.2 The landlords or MCST of commercial buildings⁵ with master-metered accounts can apply to the competent authority⁶ for en-bloc contestability status if, inter alia:
 - i) they meet the prevailing contestability threshold of electricity consumption for the entire building; and
 - ii) they obtain 100% consent from all their sub-metered tenants / unit owners to buy electricity en-bloc on their behalf.
- 3.3 Under the en-bloc electricity purchase arrangement, there are two separate contractual relationships:
 - i) one between the electricity retailer and the master-metered consumer;
 and
 - ii) another between the master-metered consumer and the sub-metered consumers. This can either be bundled with the principal agreement under the first contractual relationship or separately entered into between the master-metered consumer and their respective sub-metered consumers.
- 3.4 Some retailers also undertake value-added services for their mastermetered consumers, i.e. billing the sub-metered consumers for purchase of electricity under the en-bloc electricity purchase arrangement.

4 GST treatment of supply of electricity under the en-bloc electricity purchase arrangement

4.1 There are two separate supplies of electricity under the en-bloc electricity purchase arrangement. The first supply is from the electricity retailer to the master-metered consumer. The second supply is from the master-metered consumer to the sub-metered consumer.



² A consumer's contestability status is determined based on a qualifying quantum of electricity

³ Instead of buying electricity at regulated tariff, the contestable consumer can negotiate with licensed electricity retailer on electricity supply packages or price plans based on its needs.

For electricity bought from the wholesale market, the electricity consumption will be billed at spot prices.

⁵ E.g. shopping malls, multi-storey factories, industrial complexes, etc.

⁶ This refers to the Energy Market Authority.

- 4.2 For the first supply of electricity to the master-metered consumer, the GST-registered retailer must issue a tax invoice to the master-metered consumer and account for GST on the supply of electricity for the entire building, including those consumed by the sub-metered consumers.
- 4.3 For the second supply of electricity to the sub-metered consumers:

• If the master-metered consumer is GST-registered

The GST-registered master-metered consumer must issue tax invoices to charge and account for GST on the portion of electricity consumed by the sub-metered consumer. The GST-registered master-metered consumer is entitled to claim the GST charged by the retailer, subject to the rules for claiming input tax.

• If the master-metered consumer is not GST-registered

While the master-metered consumer does not have to charge GST to the sub-metered consumers, it is not entitled to claim the GST charged by the retailer.

• Sub-metered consumer

Only a GST-registered sub-metered consumer is entitled to claim the GST charged by the GST-registered master-metered consumer, subject to the rules for claiming input tax.

5 Billing and collection of payment by electricity retailers on behalf of GST-registered master-metered consumers

- 5.1 Some retailers may issue invoices and/or collect payment on behalf of the master-metered consumers from the sub-metered consumers. For instance, the retailers may invoice the sub-metered consumers on the portion of the electricity used by them.
- 5.2 Although the retailer takes on the role of billing for its master-metered consumer, the master-metered consumer (if GST-registered) remains liable for the GST on its supply of electricity to the sub-metered consumers.
- 5.3 The GST-registered master-metered consumer must keep records and account for the GST charged on the portion of electricity consumed by the sub-metered consumers in its GST returns.
- 5.4 The retailer issuing tax invoices on behalf of the GST-registered mastermetered consumers has to ensure the following:
 - (i) The retailer is authorised by the master-metered consumer to issue the tax invoices on its behalf.

- (ii) The retailer has to keep proper records and maintain an audit trail on tax invoices issued on behalf of the master-metered consumers.
- (iii) The retailer has to provide the master-metered consumer with sufficient information and/or documents required for the master-metered consumer to account for output tax on the electricity consumed by the sub-metered consumers.
- (iv) The tax invoices contain the particulars required under Regulation 11 of the GST (General) Regulations⁷.
- (v) If the retailer uses its letterhead to bill the sub-metered consumer, the retailer is required to state the following on the invoice:
 - The invoice is issued on behalf of the master-metered consumer; and
 - The master-metered consumer's name and GST registration number.
- 5.5 If the master-metered consumer is not GST-registered, the words "tax invoice" and the GST amount should not be shown on the invoice issued to the sub-metered consumer. This is so even though the retailer is GST-registered.

6 Contact information

For enquiries on this e-Tax Guide, please contact the Goods and Services Tax Division at www.iras.gov.sg (select "Contact Us").

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Please refer to Annex A for the information required on a tax invoice under Regulation 11 of the GST (General) Regulations.

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7 Updates and amendments

	Date of amendment	Amendments made
1	30 Sep 2013	This guide replaces the IRAS' e-Tax Guide on "GST Treatment on the Supply of Electricity". Editorial amendments are made.
2	18 Apr 2024	Editorial amendments are made.

Annex A – Information required on a tax invoice under Regulation 11 of the GST (General) Regulations

A tax invoice must show the following:

- (a) the words "tax invoice" in a prominent place;
- (b) an identifying number;
- (c) the date of issue of the invoice;
- (d) the name, address and registration number of the supplier (in this instance, it will be the respective master-metered consumer);
- (e) the name and address of the person to whom the goods or services are supplied;
- (f) a description sufficient to identify the goods or services supplied and the type of supply;
- (g) for each description, the quantity of the goods or the extent of the services and the amount payable, excluding tax;
- (h) any cash discount offered;
- (i) the total amount payable excluding tax, the rate of tax and the total tax chargeable shown as a separate amount;
- (j) the total amount payable including the total tax chargeable; and
- (k) any amount referred to in sub-paragraphs (i) and (j), expressed in a currency, other than Singapore currency, shall also be expressed in Singapore currency in accordance with paragraph 11 of the Third Schedule to the GST Act.