

ESS and PDRS statutory reviews 2025

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About the Justice and Equity Centre

The Justice and Equity Centre is a leading, independent law and policy centre. Established in 1982 as the Public Interest Advocacy Centre (PIAC), we work with people and communities who are marginalised and facing disadvantage.

The Centre tackles injustice and inequality through:

- legal advice and representation, specialising in test cases and strategic casework;
- research, analysis and policy development; and
- advocacy for systems change to deliver social justice.

Energy and Water Justice

Our Energy and Water Justice work improves regulation and policy so all people can access the sustainable, dependable and affordable energy and water they need. We ensure consumer protections improve equity and limit disadvantage and support communities to play a meaningful role in decision-making. We help to accelerate a transition away from fossil fuels that also improves outcomes for people. We work collaboratively with community and consumer groups across the country, and our work receives input from a community-based reference group whose members include:

- Affiliated Residential Park Residents Association NSW;
- Anglicare;
- Combined Pensioners and Superannuants Association of NSW;
- Energy and Water Ombudsman NSW;
- Ethnic Communities Council NSW;
- Financial Counsellors Association of NSW;
- NSW Council of Social Service;
- Physical Disability Council of NSW;
- St Vincent de Paul Society of NSW;
- Salvation Army;
- Tenants Union NSW; and
- The Sydney Alliance.

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1. Summary and introduction

The Justice and Equity Centre (JEC – formerly PIAC) welcome this opportunity to respond to the Department of Climate Change Energy, the Environment and Water's (DCCEEW) Discussion Paper: Energy Savings Scheme and Peak Demand Reduction Schemes statutory reviews 2025 (the Review).

The JEC support the broad approach being taken to this review, in considering the Energy Savings Scheme (ESS) and Peak Demand Reduction Scheme (PDRS) concurrently, and in expanding the scope beyond what is statutorily required. We encourage the Department to be ambitious, and ensure this Review is as comprehensive as possible.

The timing of this review is fortuitous, aligning with the ongoing development process for the NSW Consumer Energy Strategy, and being able to draw on the recommendations of the National Energy Performance Strategy and the National Consumer Energy Resources Roadmap. We recommend the Review closely consider these processes and seek to align with their objectives and principles and draw on their recommendations to the greatest degree possible. Reform decisions should also be made in light of expected future requirements, to ensure the updated schemes are compatible with predicted Government priorities and requirements, as well as those existing.

The JEC has engaged deeply with these and other relevant processes and highlights our submissions for the Departments' consideration as part of this review. In particularly we note:

- JEC submission to DCCEEW process developing the NSW Consumer Energy Strategy https://jec.org.au/wp-content/uploads/2024/03/24-03-01-Submission-to-NSW-Consumer-Energy-Strategy-for-households-consultation.pdf
- JEC submission to the 2020 statutory review of the ESS
 https://jec.org.au/wp-content/uploads/2020/05/20.05.13-PIAC-submission-to-the-Draft-NSW-Energy-Savings-Scheme-Review-Report-FINAL.pdf
- JEC submission to the November 2023 consultation reviewing aspects of the PDRS https://jec.org.au/wp-content/uploads/2023/11/23-11-20-Sub-to-OECC-PDRS.pdf

Assessing the ESS and PDRS concurrently enables the crucial opportunity to align their objectives and principles and ensure they are optimally coordinated with each other and the range of other programs and policies impacting climate, energy, industry, building and social policy outcomes in NSW. This opportunity must not be squandered.

It is increasingly apparent that the significant investments required to enable the energy system transition will have a material impact on energy costs to consumers. The ESS and PDRS are crucial tools in mitigating these impacts, improving equity and promoting the affordability and sustainability of energy services in NSW.

2. Objectives and principles

The JEC supports a comprehensive update of the objectives of the ESS and PDRS to ensure they make an optimum contribution to the transition to a more equitable, efficient and affordable zero-emissions energy system. We also recommends adding a suite of robust principles to both schemes in order to ensure optimum coordination, and alignment with (and contribution to) other NSW Government policies and priorities. While objectives frame the intent and purpose of the schemes and should give an indication of the range of outcomes they should deliver, principles are required in order to provide direction as to how design elements should be structured in order to optimise the delivery of all intended outcomes.

Objectives

The existing primary objectives of both the ESS and PDRS demonstrate a number of flaws which should be addressed as part of this review. For both schemes the focus is on 'method' and process rather than outcome, aiming to create 'a financial incentive to reduce consumption/peak demand…'. It is possible for the schemes to achieve these objective (ie. to successfully create a financial incentive) without most effectively achieving the end purpose for that incentive. The JEC recommend review of the objectives focus on the end outcome intended from the schemes with this outcome linked to overarching purpose, for instance:

'Reduced energy consumption and reduced peak electricity demand supporting efficient, affordable, reliable, low/zero emissions energy services for NSW.'

This example objective highlights the potential for both schemes to be coordinated and aligned through the adoption of a single primary objective focussed on the intended outcomes the schemes should support and promote. We contend it is crucial for the overarching purpose of reduced energy consumption/peak demand to be explicitly included in the objective to effectively guide optimal scheme design and delivery.

We recommend this review consider unifying any other objectives for both schemes, noting that there are many aspects of both schemes which could contribute to the effectiveness of the other if well-coordinated at delivery. For instance, expansion of the peak demand reduction aspect of scheme objectives to the ESS would ensure that appliances provided through the ESS would be required to have standards and operational capability to enable the flexibility and control required to reduce peak demand.

Any other objectives for both schemes should, to the greatest degree possible, be expressed as shared objectives to optimise alignment and the contribution both schemes make to the objective of more efficient, affordable, reliable, zero-emissions energy services in NSW. We recommend the Review consider adding the following additional objectives which expand on aspects of the primary objective, and apply them to both schemes:

Support the electrification in NSW, with a priority for the electrification of NSW households.

- Contribute to improved NSW household health and wellbeing through improved energy performance¹.
- Accelerate the energy transition and promote emissions reduction in line with Government 2030 and 20235 commitments and what is required to maintain temperature increases of less than 2C.
- Promote optimal efficiency and flexibility of energy usage in NSW, with priority for the efficiency and flexibility of electricity usage of NSW households.
- Promote improved equity in energy performance and energy service outcomes for NSW households.
- Support more affordable energy services in NSW through optimised efficiency and flexibility.

Principles

Where objectives are clear statements of the end purpose of the schemes, and explicitly outline the outcomes the schemes should contribute to, principles are required to provide robust guidance on how that purpose is to be fulfilled, and how those outcomes should be delivered. The JEC recommend this Review develop a set of robust principles to guide further assessment and of the schemes and a comprehensive review of their purpose, structure and delivery.

- Schemes should align with and contribute to NSW Government priorities in climate and environment, energy, building and infrastructure, industry and social policy and programs in particular, the Consumer Energy Roadmap.
- Scheme activities should prioritise impact on significant, rapid, long-term emissions reduction, through improved energy efficiency, reduced energy usage and reduced energy peak demand.
- Standards of service and product quality should be best practice and promote consistent good outcomes through quality and interoperability, supported by robust compliance and enforcement.
- Outcomes for NSW households and communities experiencing disadvantage or vulnerability should be prioritised, including energy rebate recipients, EAPA recipients, households in energy hardship, remote and regional community residents, low-income households and social housing households
- Schemes should promote equity and be accessible by minimising barriers (including financial and geographical) to participation.
- Schemes should be available throughout NSW and be able to support activities in regions where impact best promotes the objectives.

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Where energy performance refers to the thermal performance of the building shell, the energy efficiency of fixtures and appliances, and the flexibility of fixtures and appliances.

- Schemes should be consistent or compatible with other jurisdictions where possible (and where this does not involve compromise on outcomes in NSW) to maximise the opportunity for efficient activity development.
- Scheme delivery should align activities with other NSW government support programs and policies – such as EAPA, energy rebates, No Interest Loans Schemes, Social Housing Energy Upgrades, and the introduction of mandatory minimum energy efficiency standards in rental properties.
- Household interventions should be intended to improve household health and wellbeing, through improved energy efficiency and affordability.
- Impact of interventions should be material, ongoing and monitorable.
- Delivery architecture, standards, data collection, and scheme registration should support the development of a coordinated delivery platform for energy efficiency upgrades and electrification throughout NSW.
- Scheme costs should be recovered from all NSW energy users benefitting from the more efficient, lower emissions, lower cost energy they enable.

3. Scheme design and delivery

The JEC support a comprehensive reform of the scheme architecture, design and delivery for the ESS and PDRS, informed by updated objectives and robust principles as outlined.

We recommend this process consider broad reforms to both schemes, aimed at enhancing their impact, improving the equity of their delivery, focussing them on the long-term objective of electrification and upgraded energy efficiency, and aligning them with current government programs. The scope of reforms should:

- Strengthen the focus of the schemes on enabling the energy system transition and
 contributing to accelerated and long-lasting emissions reduction. The basis of the scheme
 objectives and calculations should remain reduction of energy usage/peak demand, with this
 being the most accurate, consistent and durable foundation for the schemes, while allowing a
 dynamic calculation of the emissions reduction contributions made by the schemes.
- Reforming the activities covered by the schemes, expanding them to focus on promoting and enabling electrification and improved energy efficiency. This should include assessing opportunities for 'bundled' activities to be encouraged. Activity reforms should include:
 - Adding household gas disconnection, EV charging, insulation improvements for dwellings below 2 stars, gas heating conversion, meter board upgrades associated with electrification, conversion of shared gas hot water, conversion from gas to remote controllable electric resistance hot water (in circumstances where heat pumps are not

feasible), conversion of cooktops (in conjunction with gas disconnection)

- Removing residential lighting upgrades (unless part bundled with other activities),
- Removing any exemptions from scheme liability to improve scheme equity. All energy users
 in NSW benefit from more efficient, lower cost and lower emissions energy services, and if
 costs are recovered from energy bills all users should contribute to the costs of the scheme.
- Improving scheme equity and impact through reforms to target (or restrict) household activities to high-priority cohorts, building types and locations, including:
 - Rebate recipients with gas connections, gas hot water heaters, gas heating, or building performance below 2 stars.
 - Multi-unit apartment buildings with gas connections, shared gas hot water, or gas heating.
 - o Social housing.
 - First nations community housing.
 - Rental properties of less than 2 stars (identified through implementation of energy efficiency disclosure at point of sale and lease)
 - Locations with identified electricity network constraint, or areas of identified excess local solar generation capacity, where reduced/shifted or increased load would be beneficial.
- Improving scheme equity by removing co-payment requirement for household activities. Co-payments should be removed altogether in conjunction with reforms to target all household activities in promotion of an 'equity' objective. In any case, activities targeted to cohorts on an equity basis should not be subject to co-payments.
- Introducing consumer protection regulations to schemes, including:
 - o Banning door-to-door sales associated with residential activities
 - o Banning other 'high-pressure' sales practices associated with residential activities
 - Ensuring robust and transparent 'registration' processes for residential activity providers, with ongoing monitoring of activity delivery.
 - Introducing robust and consistent 'impact assessment' criteria for household activities, capable of determining where activities are relevant and beneficial to consumers/scheme objectives.
 - Ensuring oversight from independent dispute resolution, potentially through the NSW Energy and Water Ombudsman.
- Implementing robust, best-practice standards for products and services provided through activities, including improvements to:
 - Ensure only high-quality products are able to be provided through activities supported by the scheme
 - Ensuring products provided through schemes are demand response enabled and compatible
 - Ensure products provided through the schemes are openly interoperable to optimise flexibility and capability to deliver ongoing benefit

- o Ensure activity providers employ qualified installers and technicians.
- Ensure installations associated with activities are undertaken according to all required standards of safety and quality.
- Ensure robust frameworks for monitoring of activity delivery and access to independent dispute resolution for scheme activities for households.
- Schemes should be integrated with other relevant NSW Government policies and programs supporting electrification, energy efficiency, emissions reduction, and energy affordability and social equity, through measures including:
 - Co-ordinating with energy rebate programs to ensure rebate recipients (particularly recipients of the Low-Income Household Energy Rebate) are prioritised for household activities supported through the scheme, including electrification, heating and hot water conversion and insulation upgrades (for properties below 2 stars)
 - Co-ordinating with energy rebate programs to target gas rebate recipients with electrification, and heating and hot water conversion activities.
 - Co-ordinating with EAPA and debt-relief programs to target identified EAPA recipients with electrification, heating and hot water, and insulation upgrades (for properties below 2 stars)
 - Co-ordination with rebate-swap-for solar programs to target recipients with electrification, heating and hot-water conversion, insulation upgrades (for properties below 2 stars) and battery subsidy (with demand response participation).
 - Co-ordination with the NSW Government policy program to address issues in embedded networks, with activities to support electrification of shared hot water systems, heating and hot water heating conversion, electric vehicle charging and smart load management.
 - Co-ordination with NSW Government social housing upgrades program with activities supporting insulation upgrades (for properties below 2 stars), electrification, heating and hot water conversion, participation in smart demand management.
 - Leverage implementation of energy efficiency disclosure at point of sale and lease to target electrification, hot water conversion and insulation activities (for rental properties below 2 stars)
- Improving the data matching, collection and utilisation capacity of schemes, to complement and support other government priorities and aid monitoring of impact, including:
 - Collecting key data on residential interventions by National Meter Identifier and making available to government in a standard format.
 - Ensuring data collection includes collecting information on actual or plausibly modelled impact, rather than relying on deemed impact.
 - Informing reform of energy rebate data collection to enable more effective identification of areas for scheme impact
 - Drawing on more accessible energy network data as a basis for identifying areas of local network constraint, high solar penetration, gas connections or gas embedded networks, to enable activity targeting.
- Improve effectiveness of both schemes to deliver actual demand response, through:
 - Advocate for expansion of the wholesale demand response mechanism to include households through third-party aggregators.

- Ensure demand response capability is required in products installed through scheme activities.
- Reform schemes to prioritised delivered impact (ie delivered demand response) as well as capacity potentially through multipliers for delivered demand flexibility.

ESS

The JEC supports the ESS being reformed and utilised as a tool to enable a more equitable energy transition in NSW, through refocussing on the electrification and energy performance upgrade of households.

Equity should be further prioritised through targeting measures which focus on cohorts experiencing disadvantage, as well as building types, and geographical areas and locations of optimal potential impact on overarching objectives. Regardless of whether the scheme is partly or wholly reframed to improve equity, reform should focus on radically improving the focus on delivering improved outcomes against the objectives.

Reframing the objective of the ESS, to align with and contribute to relevant Government policies (particularly the Consumer Energy Strategy) should inform substantive reforms to the structure and delivery of the scheme, including areas outlined above. Where this process is being conducted in advance of future policies and initiatives, this process should also explicitly consider opportunities for the ESS to support and enable future measures, as well as existing Government policies and priorities, including:

- Implementation of mandatory residential disclosure of energy efficiency performance at point of sale and lease.
- Implementation of mandatory minimum energy performance standards for rental residences.
- NSW rebate reform projects.
- Climate adaptation and community resilience measures.
- Implementation of Distribution Renewable Energy Zones and the utilisation of regional community micro-grids and Stand-alone Power systems.
- Utilisation of Virtual Power Plants.
- Social Housing upgrade programs.
- Implementation of jurisdictional 'one-stop-shop' electrification and energy upgrade delivery frameworks.

PDRS

This process should consider opportunities to better align the PDRS with the ESS (and other NSW Government schemes and policies) including through adopting more robust shared objectives and principles. Regardless, we recommend reform to ensure the scheme is better focussed on the intended outcome - improved energy flexibility, efficiency and reduced peak demand. As it stands, the schemes focus is ineffectively focus on the creation of the incentive to contribute to the capacity to reduce peak demand, a goal which the scheme could achieve without any material impact on peak demand itself.

While the scheme should be structured to focus on impact (and prioritise short to medium term impact on peak demand), we recommend considering expansion of the scheme to enable more meaningful engagement with households. For instance, while electrification of multi-unit dwellings

hot water and heating loads may increase electricity demand in the short term, ensuing these substantial loads are flexible at the point of conversion, would enable a significant contribution to emissions reduction, while minimising the potential impact on energy costs through improved utilisation. This review should consider expansion to a range of residential activities, including:

- Activities associated with the electrification of large, flexible household loads such as heating, hot-water heating, electric vehicle charging and batteries.
- Activities associated with the electrification of large multi-unit residential developments, particularly those with shared hot water and heating systems.

A major limitation on the potential impact of the current scheme is the scope and effectiveness of the Wholesale Demand Response Mechanism (WDRM) the scheme is designed to complement. While this review cannot directly address all of the existing issues with the effectiveness of the WDRM (and the impact of that ineffectiveness on the PDRS) we recommend this review consider all opportunities to make the required short and medium long-term changes, including:

- Ensuring both the PDRS and ESS schemes implement standards and requirements (in all products and installations) which support on going demand response capability.
- Supporting community and stakeholder-sponsored reforms of the existing WDRM mechanism, and actively advocating for the expansion of the WDRM to household loads through further reviews and rule changes.
- Considering other direct measures to improve utilisation of demand response capacity created through the scheme, including through partnering with industry providers to actively facilitate demand response in NSW, or build a wider NSW-based capacity to enable demand response.

We have made further detailed recommendations regarding opportunities for immediate reform of the PDRS in previous submissions referred to earlier in this submission. We encourage the Department to consider these as part of more substantive reforms.

4. Response to questions

1. Do you support the proposed approach to determining whether the scheme objectives remain valid? Please provide evidence for your answer.

Refer to section 2.

2. Are the ESS objectives still valid, and what evidence should the Department consumers to assess their validity? Please provide evidence to support your answer.

Refer to section 2. The ESS objectives should be reformed, consolidated or aligned with the objectives of the PDRS, and strengthened to focus more effectively on the intended purpose and outcomes of both schemes as part of a coordinated NSW policy architecture.

3. Are the PDRS objectives still valid, and what evidence should the Department consider to assess their validity? Please provide evidence to support your answer.

Refer to section 2. The ESS objectives should be reformed, consolidated or aligned with the objectives of the PDRS, and strengthened to focus more effectively on the intended purpose and outcomes of both schemes as part of a coordinated NSW policy architecture.

4. Is the ESS design appropriate for securing its objectives? What evidence should the department consider to assess design appropriateness? Please provide evidence to support your answer.

Refer to section 3.

5. Is the PDRS design appropriate for securing its objectives? What evidence should the department consider to assess design appropriateness? Please provide evidence to support your answer.

Refer to section 3.

6. What alternative or complementary objectives should the schemes focus on? Please provide evidence to support your recommendation, including reasons why the ESS and/or PDRS would be the best way to address the issue or opportunity you have identified.

Refer to section 2. The ESS objectives should be reformed, consolidated or aligned with the objectives of the PDRS, and strengthened to focus more effectively on the intended purpose and outcomes of both schemes as part of a coordinated NSW policy architecture.

7. Are there opportunities to improve how scheme costs and benefits are shared? If so Please provide evidence of how any proposed charges would result in more equitable outcomes.

Refer to section 3.

8. What adjustments could the department make to scheme settings to improve performance against the legislated and proposed objectives. How would this provide a net benefit to NSW? Please provide evidence to support your answer, including any assumptions you have made.

Refer to section 3

9. How could the Department improve transparency around how it makes decisions and how it communicates changes to the schemes?

Refer to section 2 and 3.

10. How could the Department improve the delivery of the schemes? Please provide examples of other jurisdictions and schemes where possible to support your recommendations.

Refer to section 3.

11. How could the Government improve the governance and administration of the schemes? Please provide examples to support your recommendations.

Refer to section 3

12. What additional scheme data should the department or IPART collect ad for what purpose? How could the Department make better use of new and existing scheme data?

Refer to section 3.

13. What additional reform opportunities should the department consider for the ESS and /or PDRS? Please provide evidence to support your recommendations.

Please refer to sections 2 and 3 of this submission.

5. Continued engagement

We understand this review will involve an extended process, and potentially involve scope for immediate changes while more fundamental, long-term reforms are considered. The JEC support this approach and encourage the Department to engage with us and other key stakeholders, on an ongoing basis in order to continue to consider and shape this process. We welcome the opportunity to meet with the Department and other stakeholders to discuss these issues in more depth. Please contact Douglas McCloskey at dmccloskey@jec.org.au regarding any further follow up.

Appendix of additional resources

In this section we provide links to a number of previous JEC submissions and external resources which have relevance to topics raised this process

CER regulation, deployment and incentives

The following resources provide further detail on necessary and desired regulatory reform for a fast and fair household energy transition:

- JEC submission to DCCEEW process developing the NSW Consumer Energy Strategy https://jec.org.au/wp-content/uploads/2024/03/24-03-01-Submission-to-NSW-Consumer-Energy-Strategy-for-households-consultation.pdf
- JEC submission to the 2020 statutory review of the ESS
 https://jec.org.au/wp-content/uploads/2020/05/20.05.13-PIAC-submission-to-the-Draft-NSW-Energy-Savings-Scheme-Review-Report-FINAL.pdf
- JEC submission to the November 2023 consultation reviewing aspects of the PDRS https://jec.org.au/wp-content/uploads/2023/11/23-11-20-Sub-to-OECC-PDRS.pdf
- 2022 PIAC submission to 'Promoting innovation for NSW Energy consumers' https://piac.asn.au/wp-content/uploads/2022/03/22-03-04-PIAC-sub-to-Promoting-innovation-for-NSW-energy-customers-Final3847.pdf
- 2022 PIAC submission to 'Review into consumer energy resource technical standards' https://piac.asn.au/wp-content/uploads/2022/11/22-11-10-Sub-to-AEMC-Review-into-consumer-energy-resources-technical-standards.pdf

Standards

2022 PIAC submission to 'Sustainability in residential buildings: Proposed BASIX changes'

https://piac.asn.au/wp-content/uploads/2022/06/22-02-23-PIAC-sub-to-DPE-on-review-of-BASIX-and-sustainability-measures-final40.pdf

Electrification and Decarbonisation

The following resources provide further detail on how efficient electrification of Australian homes can contribute to our energy affordability, emissions reduction efforts and our climate commitments.

- 2023 Climateworks Centre 'Climate-ready homes: Building the case for a renovation wave in Australia' https://www.climateworkscentre.org/resource/climate-ready-homes-building-the-case-for-a-renovation-wave-in-australia/
- Energy Efficiency Council 2023 'Clean Energy, Clean Demand: Enabling a zero emissions energy system with energy management, renewables and electrification https://www.eec.org.au/policy-advocacy/publications/Clean-Energy-Clean-Demand-April-2023
- 2023 PIAC 'Submission to the Senate Economic Reference Committee Inquiry into Residential Electrification' https://piac.asn.au/2023/09/29/submission-to-the-senateeconomic-reference-committee-inquiry-into-residential-electrification/

Funding & finance for efficient electrification

These resources provide further detail into potential avenues for funding and financing efficient electrification of Australian homes. Some of these resources provide specific policy advice on supporting low-come households.

- 2024 ACOSS report 'Funding and financing energy performance and climate-resilient retrofits for low-income housing'.
 https://www.acoss.org.au/wp-content/uploads/2024/02/ACOSS-Report-Funding-and-Financing-Low-income-retrofits-January-2024-.pdf
- Australian Sustainable Finance Institute 2023 'Industry Workshop: Finance for Home Retrofits' https://www.asfi.org.au/publications/industry-workshop-finance-home-retrofits-report

Equity in the household energy transition

These resources provide further detail on specific cohorts of NSW residents who will require targeted supports, policies and resourcing to effectively implement a Household Energy Strategy.

- 2024 First Nations Clean Energy Network submission to the DCCEEW First Nations Clean Energy Strategy.
 - https://assets.nationbuilder.com/fncen/pages/505/attachments/original/1708899108/First
 Nations Clean Energy Network -
 - <u>Submission in response to the First Nations Clean Energy Strategy Consultation</u>
 Paper.pdf?1708899108

- 2023 Voices for Power 2023 '<u>Our roadmap to clean and affordable</u> energy' https://www.sydneyalliance.org.au/our-roadmap
- 2023 Sydney Community Forum '<u>Submission to Residential Electrification Senate Inquiry</u>' https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Economics/ResElectrification/Submissions
- Brotherhood of St Lawrence 2023, 'Enabling electrification: addressing the barriers to moving off gas faced by lower-income households https://www.bsl.org.au/research/publications/enabling-electrification/
- ACT Council of Social Services 2023 'Supporting a fair, fast and inclusive energy transition in the <u>ACT' https://actcoss.org.au/publication/supporting-a-fair-fast-and-inclusive-energy-transition-in-the-act-act-small-energy-consumers-understanding-planning-and-support-needs/</u>
- 2023 Community Sector Blueprint: National Framework for Minimum Energy Efficiency Rental Requirements
 https://static1.squarespace.com/static/602f0d14c4c0a77efc25e152/t/64b095418e792e5f538088fb/1689294161675/Final+Community+Sector+Blueprint+-+Mandatory+Minimum+Rental+Standards+++%28July+2023%29.pdf

Energy Efficiency

The following resources provide further evidence demonstrating why energy efficiency and electrification must be progressed together by detailing the affordability, health and emissions reductions benefits that are gained through energy efficiency.

- Energy Efficiency Council and ANZ 2023 'Putting Energy Efficiency to Work: The Forgotten Fuel Series" https://www.eec.org.au/policy-advocacy/publications/forgotten-fuel-series
- Climate Council 2022 'Tents to Castles: Building Energy Efficient, Cost-Saving Aussie Homes'
- https://www.climatecouncil.org.au/resources/tents-castles-building-energy-efficient-cost-saving-aussie-homes/
- Energy Consumers Australia and Renew 2022 'Energy Efficient Housing Research'
 https://renew.org.au/wp-content/uploads/2022/11/NGR2111008-Energy-Efficient-Housing-PUBLIC-Report final.pdf>
- International Energy Agency 2023 'Energy efficiency and behaviour' in Net Zero
 Roadmap: A Global Pathway to Keep 1.5 in Reach https://www.iea.org/reports/net-zero-roadmap-a-global-pathway-to-keep-the-15-0c-goal-in-reach

Gas is costing Australian households

The following resources include modelling and costings demonstrating how much more dual-fuel households pay for their energy compared to efficient, electric homes.

- Environment Victoria 2023 'It's a Gas: How ditching gas this winter can cut heating bills by 75%'
- https://environmentvictoria.org.au/2023/07/19/its-a-gas-how-ditching-gas-this-winter-can-cut-heating-bills-by-75/
- Climate Council 2022 'Switch and Save: How Gas is Costing Households' https://www.climatecouncil.org.au/resources/switch-and-save-how-gas-is-costing-households/
- Renew 2021, 'Households Better Off: Lowering energy bills with the 2022 National Construction Code' https://renew.org.au/wp-content/uploads/2021/10/Households-Better-Off-full-report.pdf
- Renew 2022, 'Limiting energy bills by getting off gas' https://renew.org.au/wp-content/uploads/2022/11/Report-Limiting-energy-bills-by-getting-off-gas.pdf

Health impacts of gas

The following resources detail some of the health risks from the use of gas in homes

- Asthma Australia 2022 'Homes, Health and Asthma in Australia' https://asthma.org.au/wp-content/uploads/2022/11/AA2022 Housing-Survey-Report full v4.pdf
- Climate Council 2021, 'Kicking the Gas Habit: How Gas is Harming our Health'
 https://www.climatecouncil.org.au/wp-content/uploads/2021/05/Kicking-the-Gas-Habit-How-Gas-is-Harming-our-Health.pdf
- Doctors for the Environment 2020 'Home Gas Appliances and Your Health: Fact Sheet' https://dea.org.au/home-gas-appliances-and-your-health-fact-sheet/

Gas network transition - necessity, risks & myth-busting

The following resources provide greater detail into why a retreat of the gas network is necessary and policy requirements for advancing efficient renewable electrification. Some of these resources address stranded assets, risk management and cost recovery.

- Grattan Institute 2023 'Getting off gas: why, how, and who should pay?' https://grattan.edu.au/report/getting-off-gas/
- Energy Consumers Australia 2023 'Stepping Up: A smoother pathway to decarbonising homes' https://energyconsumersaustralia.com.au/wp-content/uploads/Stepping-Up-Report-Final.pdf
- Energy Consumers Australia 2023 'Risks to gas consumers of declining demand' https://energyconsumersaustralia.com.au/publications/risks-to-gas-consumers-of-declining-demand
- Institute for Energy Economics and Financial Analysis 2023 "Renewable gas' campaigns leave Victorian gas distribution networks and consumers at risk' https://ieefa.org/resources/renewable-gas-campaigns-leave-victorian-gas-distribution-networks-and-consumers-risk

why to get off gas https://www.melbo	ournefoe.org.au	/community	gas retireme	ent roadmap	