Justice and Equity Centre

19 September 2025

New England REZ team
EnergyCo
By email: newengland.access@energyco.nsw.gov.au

Dear New England REZ team,

**New England REZ Generation and Storage Consultation Paper**

The Justice and Equity Centre (JEC) welcomes the opportunity to respond to EnergyCo's consultation paper on New England Renewable Energy Zone (REZ) Generation and Storage (the consultation paper).

We welcome EnergyCo's consideration of efficient coordination of new renewable generation and storage inside REZs relative to investment in energy resources generally. The need to optimise new generation and storage investment regardless of where it occurs will continue, and investors and consumers will be best served by a solution that is robust, enduring and based on consistent principles promoting the interests of NSW consumers.

In this context, we recommend EnergyCo initiates a more substantial process aimed at developing a framework balancing the rights of generators and storage providers inside REZs with those of providers outside REZs, and optimising efficient new investment – and fair cost recovery - wherever it occurs.

Ultimately, the solution must ensure investments occur where the resources enable the most viable projects, whether these are close to REZs or not. Ensuring such investments progress is demonstrably in NSW consumers' interests. Proponents should not be unduly dissuaded from investment in viable projects due to relative proximity to a designated REZ.

The framework must also minimise free-riding. Projects that do not gain access rights within a REZ, but still derive benefit from REZ infrastructure, should contribute an appropriate share of the costs of that infrastructure.

We welcome the opportunity to meet with EnergyCo and other stakeholders to discuss these issues in more depth. Please contact Michael Lynch at mlynch@jec.org.au regarding any further follow up.

Yours sincerely,

**Michael Lynch, PhD**
**Senior policy officer**