

2025 consultation

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Submitted via email: contact@netzerocommission.nsw.gov.au

Net Zero Commission – Response to Consultation Paper

Endeavour Energy appreciates the opportunity to provide feedback to the Net Zero Commission's [Consultation Paper](#) regarding about the key issues shaping the state's transition to a net zero, climate-resilient future.

Endeavour Energy is the electricity distribution network service provider (DNSP) to Australia's third largest economy spanning Sydney's Greater West, the Blue Mountains, the Southern Highlands, the Illawarra and the South Coast of NSW serving over 2.7 million Australians. Our network includes over 430,000 power poles, 206 major substations and 60,000kms of powerlines including over 1,800km of sub-transmission network (132kV and/or 66kV).

Given the breadth of questions raised in the Consultation Paper, we have responded to those that are particularly relevant to our role as a distribution network service provider, particularly as we evolve to a distribution system operator (DSO). Please see **Appendix A** for our responses.

We would be pleased to discuss our submission further. If that would assist, please contact [REDACTED]
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Yours sincerely

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Appendix A – response to selected questions

Question 1: What can you tell us about your experience of the impacts of climate change and how can the commission seek to reflect and respond to this in its work?

Endeavour Energy has observed significant impacts of climate change on our operations and infrastructure. Extreme weather events, such as heatwaves, storms, and bushfires, have increased in frequency and intensity, leading to disruptions in power supply and damage to our assets.

Endeavour Energy has developed multiple strategies to address the impacts of climate change, such as the business' [Resilience Strategy](#) and Sustainability Strategy as included in our latest [Annual Sustainability Report](#) on page 10. Key context, actions, and future priorities on climate action and adaptation is included in pages 11 – 15 of the report, as well as in the Appendix on page 34.

To address these challenges, the commission may consider incorporating climate resilience and adaptation into its planning and regulatory frameworks. This includes setting stringent standards for infrastructure resilience, promoting the adoption of advanced technologies, and ensuring that climate risk assessments are integrated into all levels of decision-making. The commission may also consider embedding diverse climate scenarios as a backdrop to infrastructure asset development.

Question 2: What actions can the commission take to engage across the community to help drive the shifts needed for the net zero transition and for effective climate change mitigation and adaptation?

The Net Zero Commission can drive community engagement by fostering transparent communication and collaboration with all stakeholders. This may involve organizing public consultations, workshops, and educational campaigns to raise awareness about the benefits of the net zero transition. Additionally, providing incentives for community-led renewable energy projects and supporting local initiatives can empower communities to actively participate in climate change mitigation and adaptation efforts.

Leadership aspects of infrastructure sustainability stakeholder engagement (including that for First Nations people) are considerations currently included in the certification and rating process of the Infrastructure Sustainability Council of Australia. These requirements are already an expectation among large infrastructure projects in transportation. Establishing best practice standards and expectations around engagement could support a consistent approach that serves to drive this desired outcome.

Question 3: How should the commission best engage with First Nations people to learn about cultural knowledge and practices to support adaptation, and what information and evidence should it draw on to inform its understanding of these practices?

To effectively engage with First Nations people, we suggest that the commission should establish genuine partnerships based on mutual respect and trust. This may involve consulting with First Nations communities from the outset, recognizing their cultural knowledge and practices, and incorporating their input into policy and project planning. The commission may also consider drawing on traditional ecological knowledge and collaborate with First Nations experts to develop culturally appropriate adaptation strategies. For example, traditional custodians of the land have strongly advocated for cultural burns as a way to manage fuel load to prevent catastrophic bushfires.

As referenced above, the Infrastructure Sustainability Council of Australia has established leadership requirements as part of their certification and rating process, with some credits establishing clear leadership in First Nations-specific engagement. We also note that Reconciliation Australia has a range of resources that encourage key actions to embed First Nations considerations into planning and delivery of actions.

Question 4: What additional mechanisms, support, or incentives can meaningfully empower and enhance First Nations people's involvement in climate mitigation, adaptation and environmental stewardship?

The commission may consider enhancing First Nations people's involvement by providing targeted support and incentives. This may include funding for community-led projects, capacity-building programs, and opportunities for First Nations people to participate in decision-making processes. Additionally, recognizing and valuing the unique contributions of First Nations people to environmental stewardship is likely to foster greater inclusion and collaboration.

Question 5: What additional information and evidence should the commission consider when assessing progress towards NSW's targets for reducing net greenhouse gas emissions?

The commission may consider having regard to a wide range of data sources and indicators to assess progress towards NSW's greenhouse gas reduction targets. This includes monitoring emissions from all sectors, tracking the adoption of renewable energy technologies, and evaluating the effectiveness of policies and programs. Engaging with academic institutions, industry experts, and community organizations can provide valuable insights and ensure a comprehensive assessment.

A key aspect that should be considered in tracking performance and progress is an indicator of the funds and investments that are directly supporting climate-related action. As communicated broadly by the United Nations in assessing progress on UN Sustainable Development Goals, failing to meet annual investment requirements towards addressing climate change as well as an underestimation of required funding, is leading to ever-increasing climate-related risks.

Question 6: The speed of deployment of electricity generation and infrastructure is a key risk to emissions reduction targets. What more could be done to fast-track deployment?

To accelerate the deployment of electricity generation and infrastructure, we consider there is a need to streamline regulatory processes, reduce bureaucratic hurdles, and provide clear guidelines for project approvals. We also consider that there are opportunities to invest in grid modernization, support innovation in renewable energy technologies and foster public-private partnerships to expedite the transition to a low-carbon energy system.

Question 7: Are the measures now in place sufficient to ensure community engagement and benefit sharing from the build out of infrastructure for the energy transition?

Current measures for community engagement and benefit sharing should be continuously evaluated and improved. The commission should ensure that communities are actively involved in the planning and implementation of energy projects and that they receive tangible benefits, such as job opportunities, improved infrastructure, and access to clean energy. Establishing community benefit agreements and promoting local ownership of renewable energy projects can enhance community support and participation.

Question 8: Are First Nations communities adequately engaged and included in sharing the benefits of the transition? What more could be done, and by whom?

While there have been efforts to engage First Nations communities, we consider that more can be done to ensure their inclusion and benefit sharing. The commission may consider working closely with First Nations leaders and organizations to identify and address barriers to participation. Providing dedicated funding, creating advisory groups, and ensuring representation in decision-making processes can enhance the involvement of First Nations communities in the energy transition.

Question 15: What short to medium term measures could be prioritised to address the systemic challenges regarding waste generation and resource recovery?

Over the short to medium term, the commission may consider prioritising measures that promote waste reduction, recycling, and resource recovery. This includes implementing stricter regulations on waste management, supporting the development of circular economy initiatives, and investing in innovative technologies for waste processing. Public awareness campaigns and incentives for businesses and households to adopt sustainable practices can also drive positive change. Given the rapid growth expected in areas of NSW, it could be helpful to draw on aspects of industrial ecology to promote a circular economy and capture greater efficiencies in resource management and recovery.

Question 22: What should be included in a monitoring framework for NSW in the context of the transition to net zero, including any specific metrics and indicators?

A robust monitoring framework should include specific metrics and indicators to track progress towards net zero. This includes measuring greenhouse gas emissions, energy consumption, renewable energy generation, and the adoption of low-carbon technologies. The framework should also consider social and economic indicators, such as job creation, community engagement, and equity in the distribution of benefits. Regular reporting and transparent communication of progress can ensure accountability and continuous improvement. As suggested previously, tracking appropriate funding to address climate adaptation and mitigation, should be a priority to ensure long-term objectives are supported. Nature-based climate solutions and metrics should also be explored.

Question 23: The adaptation objective is for NSW to be more resilient to a changing climate. The Act allows for regulations to further define the adaptation objective. What does a more resilient NSW look like to you?

We consider that a more resilient NSW is one that can effectively adapt to the impacts of climate change while maintaining the well-being of its communities and ecosystems. This involves building resilient infrastructure, protecting natural resources, and fostering social cohesion. We consider that the commission may consider defining the adaptation objective by setting clear targets for resilience, promoting adaptive capacity, and integrating climate considerations into all aspects of planning and decision-making.

Question 24: What additional information and evidence should the commission consider when assessing progress towards the adaptation objective?

The commission may consider having regard to a comprehensive range of information and evidence when assessing progress towards the adaptation objective. This includes monitoring climate impacts, evaluating the effectiveness of adaptation measures, and assessing the resilience of communities and ecosystems. In addition, engaging with stakeholders, conducting regular reviews, and incorporating feedback can ensure that the adaptation strategies remain relevant and effective. Learnings from international best practice and approaches should be adopted in local and regional contexts.