2025 consultation

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SolarCitizens

A community voice for cleaner energy and transport

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Solar Citizens' Submission: NSW Net Zero Commission 2025 Consultation

About Solar Citizens

Solar Citizens is an independent, community-based organisation working to grow renewable energy and clean transport to bring down bills and reduce household emissions. Since our launch in 2013, we have gathered support from over 200,000 Australians, many of whom are early adopters of rooftop solar, home batteries, virtual power plants (VPPs) electric vehicles (EVs) and other Consumer Energy Resources (CER). While Australia leads the world in home solar uptake, many households - such as renters; apartment and strata residents; and lower-income households including social housing tenants - continue to face barriers to accessing CER and remain reliant on increasingly expensive coal, petrol and gas.

Solar Citizens is committed to advocating on behalf of these locked out households, as well as the millions of solar-loving Aussies whose rooftops are helping to power a cleaner, cheaper energy grid. Urgent, ambitious action is required from all Governments to ensure that everyone can access the benefits of cleaner, more affordable energy and transport, as soon as possible.

Introduction

Solar Citizens previously made a submission[1] to the Net Zero Commission 2024 Annual Report, and will be building on these recommendations in the following submission, highlighting the critical role that CER uptake will play (and is already playing) in meeting NSW's emissions reduction targets on time, whilst delivering significant co-benefits to society as a whole.

In-keeping with consumer energy and transport being our primary area of expertise - as well as the key interest of our supporter base whom we represent - this submission will address consultation questions 5, 6, 19 and 20.

[1] Solar Citizens' Submission to the NSW Net Zero Commission 2024 Annual Report

Consultation Question 5:

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

Both the 2024 Annual Report and the 2025 Consultation Paper fail to adequately describe the intersection of CER with both the electricity and energy sector and the built environment sector - and its (largely unrealised) potential to significantly reduce greenhouse gas emissions in both sectors.

The emissions produced from household gas appliances are attributed to the built environment sector, however the emissions produced by household electricity use are counted under 'Electricity and Energy'. The result of this is that household emissions (from electricity and gas) are not aggregated together within the annual report nor the consultation paper, and therefore the impact of CER on reducing or eliminating household emissions - both directly through on-site solar energy consumption and indirectly through local distribution networks, microgrids and VPPS - is not communicated properly.

The electricity and energy section of the consultation paper mentions CER but focuses mostly on the importance of large scale renewable energy projects. While we fully acknowledge the critical role large scale wind, solar and hydropower play in supporting NSW's energy grid, we draw attention to the fact that in the past year, rooftop solar accounted for 12% contribution to NSW's total demand, whereas utility scale solar contributed 10%[2].

The ability of CER to be rolled out without the need to build additional transmission infrastructure means that deployment is less at risk of delay compared to large-scale energy projects. Furthermore, with over ten million Australians now happily reaping the benefits of solar panels on their roof, it's safe to say CER is not at risk of the various social license issues that continue to delay the roll-out of large-scale renewable energy projects.

The Australian Photovoltaic Institute, in a report commissioned by Solar Citizens[3], found that NSW's total residential rooftop solar potential is 18 GW, of which only 4 GW has been realised so far. Of the 14 GW unrealised solar capacity, 5.4 GW is on the rooftops of private rentals, apartments and social homes. This potential is significant when compared to the 2.88 GW energy generation capacity of Eraring coal-fired power station, set to close in 2027.

In 2024, the NSW government has set an ambitious target of one million solar and battery households by 2035, and in doing so became the first Australian jurisdiction to set uptake targets for CER. In 2025, the Federal Government followed NSW's lead and advice from the Australian Energy Market Operator (AEMO)[4] and other advocacy groups including Solar Citizens, and set a target of one million household batteries by 2030 with funding committed under the Cheaper Home Batteries program to deliver on this.

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[2] explore.openelectricity.org.au - accessed 1 July 2025
[3] Solar Potential Report (2024) Solar Citizens
[4] 2024 Draft ISP report & Chart Data (Figure 2) (2024) AEMO

AEMO's Draft 2024 Integrated Systems Plan (ISP)[5] models the critical role of CER in enabling the timely closure of coal-fired power in the National Energy Market (NEM) - specifically 90% by 2035, and 100% of coal-fired power by 2040. This is contingent on a number of factors including the roll out of one million household batteries in the NEM by 2030. The ISP report also indicates a need to increase rooftop solar generation capacity fourfold by 2050 in order to secure a permanent transition away from fossil fuels.

The Net Zero Commission has a role to play in informing the NSW Government on the importance of rapid, equitable CER uptake to enable Eraring and other coal-fired power stations to close on time - or sooner than planned as required to meet Net Zero targets.

On page 7 of the consultation paper, it is stated that "to achieve the 2030 Roadmap target of 12 GW of renewable generation capacity by 2030, almost 9 GW still needs to be commissioned". In addition to reporting on the large-scale renewable energy capacity required, we recommend that the commission identifies the 14 GW unmet potential of CER generation capacity, as well as on the state's progress to meeting its target of one million solar and battery households by 2035.

Recommendation 5.1: Communicate the role of CER and report on progress to uptake targets

Timeframe: As soon as practicable, moving forward

The commission must better communicate the impact of CER on driving significant emissions reduction within both the built environment sector in regard to household emissions and the electricity and energy sector by contributing to a more renewable grid.

In all documentation moving forward, the commission must identify the significant untapped potential of small-scale, as well as large-scale renewables, and should emphasise that NSW's progress to meeting emissions reduction targets is contingent on accelerated uptake of CER.

The commission should report on NSW's progress to meeting its target of one million solar and battery households by 2035, and provide recommendations to the government to ensure that this target is met on time - including the setting of interim targets, changes to existing rebates and programs or the introduction of additional measures, as required.

The commission should produce a supplement to the Annual Report that provides further context to how household emissions are defined, including a breakdown of the emissions portfolio of using electricity (both coal-generated and from renewable sources, according to the make-up of the NEM) as well as using natural gas for household purposes such as heating, cooling, cooking and hot water use. This explainer would more accurately describe the built environment sector emissions and help demonstrate the impact of CER on reducing household emissions.

[5] See [4]

Consultation 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?

Recommendations for Commercial and Industrial Solar and Storage

As mentioned in the previous answer, NSW's total unrealised residential rooftop solar potential is 14 GW. What's more, commercial and industrial (C&I) buildings in NSW hold an additional 7 GW potential - almost all of which is unrealised[6]. This 20 GW of combined rooftop solar capacity equates to the total 19.7 GW large-scale renewable energy generation capacity approved in NSW as of November 2024[7].

Given this information, we strongly suggest that the NSW Government commit new funding and introduce new policies to ensure that as much of this 20 GW of renewable energy generation capacity is realised, and is done so in a way that provides maximum financial and social benefit to communities, households and businesses.

In particular, we recommend policies to incentivise solar and storage uptake on C&I buildings, that can then be exported locally to locked out households in higher-density areas, such as apartment residents. This recommendation ties in with the Urban Renewable Energy Zone (UREZ) model which will soon be trialled by Endeavour Energy in the Illawarra Region and by Ausgrid in the Sydney suburbs of Mascot and Botany. Solar Citizens is highly supportive of the UREZ model, and recently played a role in conceptualising a Sydney-wide Renewable Energy Zone as summarised by the Committee for Sydney[8] - collaborating with the energy sector, state and local governments, peak bodies and community organisations.

The Committee for Sydney's report highlights the numerous barriers to realising the enormous potential of C&I solar and storage. These barriers include:

a) inertia within the C&I sector as clean energy exports typically do not fall within core business activities;
b) rebate schemes are designed for households, with discounts for solar and battery systems <100kW under the small-scale renewable energy scheme (SRES); while the capacity investment scheme (CIS) tenders out renewable energy projects over 300 kW (although typically much higher i.e., into the GW) - meaning there is a gap in government support for mid-scale solar and battery systems between 100 kW - 300 kW;
c) currently only energy distributors (e.g, Ausgrid) are funded to install mid-scale 'community' batteries in urban areas;
d) tariff structures are also designed for households, and there is a lack of incentive for C&i sector to install a solar or battery system to service energy consumption beyond their own needs.

[6] More NSW businesses with rooftop solar would be a 'win win' (2024) Nexa Advisory
[7] Renewable Energy Transition Update (2024) NSW Government
[8] Sydney as a Renewable Energy Zone (2025) Committee for Sydney

Recommendation 6.1: Introduce incentives to unlock C&I solar

Timeframe: March 2027, with initial funding committed by June 2026

Details: The NSW Government must take action to leverage the significant rooftop solar and storage potential of commercial and industrial buildings, especially in higher-density urban and suburban areas where the electricity demand is higher than in regional or rural areas, and where transmission infrastructure already exists or can be easily installed or upgraded as required.

Specifically, the NSW Government should investigate options including specific rebates for businesses to install oversized solar systems (>100kw) and mid-scale behind-the-meter battery storage systems (>50kw) with favourable tariff structures set up to support their business activities as well as incentivising the export of providing clean, cheap renewable energy to surrounding homes including apartments, rentals and strata-titled properties.

We recommend that funding is committed in the next annual budget to introduce incentives - which may include rebates, loans, tariff structure reform.

Recommendation 6.2: Enable alternative options for mid-scale storage

Timeframe: March 2027, with trials implemented by June 2026

Details: The NSW Government must take action to enable alternative deployment options for mid-scale (>100kw) battery storage within urban and suburban areas, other than or in addition to the grid-owned and operated 'community batteries' model.

These alternative options should include:

a) Mid-scale battery systems (either behind or in front of the meter depending on size) installed in residential strata buildings and precincts to provide cleaner, cheaper energy to all residents - installed in both new and existing high-density residential developments and owned by one or more Owners Corporations;
b) Mid-scale battery systems (either behind or in front of the meter depending on size) installed in commercial and industrial precincts with high rooftop solar deployment, owned by one or more businesses operating in that precinct and for the purposes of storing excess solar energy that can then be exported within the surrounding community during peak demand periods;
c) Community batteries owned by local councils, community organisations, schools or other public services, with optional third party support to manage the system and ensure the maximum financial benefits are realised by the community, rather than by the distributor.

We also recommend that the Transport and Infrastructure State environmental planning policies (SEPP) be reviewed and modified to enable and accelerate the installation of mid-scale battery systems via alternative ownership models.

Recommendation 6.3: Establish additional Urban Renewable Energy Zones

Timeframe: Ongoing/ begin investigating by December 2025

Details: The NSW Government should investigate the case for all major towns and cities to operate as Urban Renewable Energy Zones (UREZs), as soon as possible.

We recommend that action is taken within this term of government to realise this opportunity and the numerous potential benefits including: emissions reduction; accelerated deployment of renewable energy generation and storage; local resilience to blackouts and natural disasters; and increased energy equity with cost of living relief for all households.

Following the 2025 launch of Illawarra UREZ, NSW EnergyCo should commit funding to additional UREZ pilots - which may include Ausgrid's Community Power Networks in Charmhaven and Mascot-Botany, as well as additional pilots.

In addition to recommendations 6.1 and 6.2, the NSW Government should identify further opportunities or requirements to ensure the success of this model - such as changes to energy market regulations, incentives or other policies to accelerate implementation.

Recommendations for Vehicle-to-Grid

With the introduction of the New Vehicle Efficiency Standard (NVES) from 1 January 2025, the uptake of EVs in NSW is expected to increase dramatically in the next few years. This shift will lead to increased demand for grid energy, and if managed poorly this could lead to additional stress on the grid at peak times.

However, with Vehicle-to-Grid (V2G), Vehicle-to-Home (V2H) and Vehicle-to-Load (VTL) technologies, there is an opportunity for EVs to support the grid and reduce energy bills for all consumers by distributing energy storage at the household level. V2G in particular holds significant promise for enhancing grid stability, managing peak demand and integrating renewable energy sources - with significant financial benefits for all energy consumers including those without an EV[9].

Specifically, V2G allows EVs to serve as mobile energy storage units, leveraging their large batteries to store excess energy from the grid during periods of low demand or high renewable

[9] 'Batteries on Wheels' Report (2024) Solar Citizens

energy generation. This stored energy can then be discharged back to the grid during peak demand periods or when renewable energy generation is low, helping to balance supply and demand and support grid stability.

AEMO[10] models a need for 8GW passive and orchestrated consumer storage in the NEM by 2030. This modelling includes V2G enabled 'batteries-on-wheels' as well as small-scale household battery systems under 'consumer storage' indicating the role of this technology in meeting storage targets.

Further to this, it has been estimated by the Australian Renewable Energy Agency (ARENA) that if enabled, V2G could account for over a third of total energy storage by 2030, deferring the need for $94 billion in large-scale battery storage investment[11].

However, with no current government incentives to subsidise the high costs of installing home V2G (bidirectional) charging equipment, it is likely that uptake of this revolutionary technology will be stunted. Therefore, its potential for emissions reduction and cost of living benefits to consumers will likely not be realised in full representing a missed opportunity for NSW.

Recommendation 6.4: Investigate introducing incentives to accelerate uptake of V2G

Timeframe: June 2026

We recommend that the NSW Government investigates introducing incentivises such as rebates, subsidies or loans to accelerate uptake of V2G. This may include reviewing current state incentives such as the Peak Demand Reduction Scheme (PDRS), and making amendments so that household bidirectional charging equipment is included in the list of products eligible for discount.

[10] See [4]
[11] V2X.au Summary Report (2023) ARENA

Consultation Question 19:

What additional measures could accelerate electrification and increase energy efficiency of new and existing buildings?

Within the current term, the NSW Government has an opportunity as well as a responsibility to not only deliver on housing targets, but to simultaneously combat cost of living pressures and address the built environment sector's rising greenhouse gas emissions. The Planning Minister is under pressure to deliver on the National Housing Accord (377,000 new diverse and well-located homes across the state by 2029) and the Transport Oriented Development (TOD) Program (185,800 new homes by 2039 with a focus on increasing density). The government is also extending a 50 per cent land tax discount on build-to-rent developments, signalling its intention to increase the supply of apartments available for rent. Housing programs also come with a mandatory affordable housing contribution (the percentage varies for each program) and additional government funding is being promised for more social housing to be built.

NSW already has the highest proportion of apartment residents (51% of all of Australia's apartment residents live in NSW), renters (33%) and social housing tenants (35%). It is imperative that the government takes urgent action to not only ensure new homes are future-proof with CER and efficient electric appliances, but to also electrify and decarbonise existing homes - especially apartments, strata properties, private rentals and social homes.

Recommendations for New Homes in the Short Term

The Institute for Energy Economics and Financial Analysis (IEEFA)[12] finds that if all new appliances purchased in NSW were electric from 2026, residential gas consumption would gradually phase down to near-zero by 2050. Further to this, IEEFA's latest modelling found that household energy upgrades including efficient electric appliances, rooftop solar and batteries could slash household energy bills by more than 94% in the Sydney region, and that gas appliances are typically the least efficient form of household appliance[13]. Building all-electric homes will deliver more affordable energy bills for residents from day one, reduce the need for costly and challenging retrofits to upgrade gas infrastructure and appliances, especially in apartments.

Five NSW councils have now enacted electrification requirements for new developments, attracting widespread support from across a broad range of sectors. The Property Council of Australia described the City of Sydney's recent move to ban gas as a "clear step towards cleaner, cheaper, all-electric buildings" and that "it's what the future demands"[14]. The Owners Corporation Network also backed this policy, stating that electrification upgrades cost close to $10,000 per apartment[15]. Solar Citizens' Joint Letter to Planning Minister Paul Scully was signed by twenty-two industry groups, peak bodies, councils and environment, climate, and housing organisations[16].

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[12] Eight ways NSW could cut energy bills during the cost-of-living crisis, and beyond (2024) IEEFA
[13] A focus on homes, not power plants, could halve energy bills (2025) IEEFA
[14] Minns criticised council's gas ban as an 'overstep'. Developers say it's a no-brainer, Sydney Morning Herald
[15] See [14]
[16] TOD Joint Letter (2025) Solar Citizens

Despite the increasing levels of support from all stakeholders involved, the NSW Government has not yet expressed any kind of support for electrification requirements in new buildings. With the TOD Program underway and the pressure of meeting housing targets, it's crucial that electrification policies are implemented as soon as possible - starting with an urgent moratorium on gas connections in new apartment buildings to prevent future residents from being locked into gas due to complications around electrification retrofits in multi-dwelling residential developments, as described in Solar Citizens Electrify Wolli Creek report[17].

Part 1 of the TOD program will deliver up to 60,000 new apartments in eight higher-density 'accelerated precincts'. Development Applications (DAs) valued at $60 million or more and located within these precincts will be assessed as State Significant Developments (SSDs) by the NSW Government until November 2027.

In addition to mandating the electrification of these new developments, it is imperative that the renewable energy generation and storage potential is realised through clean energy mandates. Urgent action is required to ensure these new homes are built with access to clean energy through rooftop solar and efficient electric appliances, and are future-proofed with battery storage and electric vehicle charging infrastructure. The technologies required to achieve this already exist, and can be easily deployed at a relatively low cost to developers.

Recommendation 19.1: Place a moratorium on gas in new apartments

Timeframe: November 2025 (in place until a permanent ban is implemented)

Details: The NSW Government must take urgent action to prevent new gas connections being installed in up to 60,000 new apartments and strata-titled properties due to be approved under the Transport Oriented Development Program before November 2027. We strongly urge the NSW Government to implement a special planning legislation or moratorium on new gas connections and gas appliances being installed in new multi-dwelling developments by November 2025.

Recommendation 19.2: TOD Program (Part 1) to deliver clean energy for apartments

Timeframe: November 2025 (in place for two years until November 2027)

Details: The NSW Government must take urgent action to ensure that these new homes (up to 60,000 apartments due to be approved as State Significant Developments by Nov 2027 under Part 1 of the Transport Oriented Development Program) are future-proof and Net Zero ready with maximum coverage of rooftop solar, behind-the-meter battery storage, and electric vehicle charging readiness.

[17] Electrify Wolli Creek report (2024) Solar Citizens

Recommendations for New Homes in the Longer Term

Furthermore, additional actions must be taken to ensure that all new developments are future-proof from the time of construction with clean energy mandates and no new gas.

All new apartments should be built with solar panels as a default, and optimised for the benefit of residents and the wider community wherever they are installed - recognising that different buildings will have different requirements. Optimisations could involve installing a solar battery; ensuring meter boards are strategically located, designing buildings with optimal roof pitching and appropriate building materials to support the installation of solar panels; and preventing sunlight obstruction from neighbouring buildings or other impediments.

While low and mid-rise apartments can benefit from reduced household energy bills through solar sharing technology, high-rise developments should be built with rooftop solar and storage to offset the electricity required by common property areas to reduce strata levies. Solar and storage on high-rise developments will also help to increase the building's electricity supply to account for all-electric appliances and the operation of EV chargers.

Apartment developments should also be equipped with behind-the-meter battery storage to reduce peak demand, lower energy bills and support the grid. At a minimum, new developments must come with space for batteries to be installed at a later date, if they are not already installed.

The same goes for EV charging. To support the equitable and rapid uptake of EVs in NSW, new developments must be equipped with adequate charging infrastructure to enable future residents to charge at home, rather than copping the inconvenience and higher prices of charging outside the home (e.g., using public chargers).

The National Construction Code (NCC) is updated every three years and provides a framework e for new energy efficiency requirements and improved building standards to be adopted in each state. The 2025 NCC contains the following notable updates to requirements for residential apartment (Class 2) buildings:

- A Class 2 building must be provided with an on-site solar photovoltaic (PV) system that covers 100% of the roof space, excluding areas shaded for more than 10% of daylight hours; areas used for other purposes; or where there are safety or other technical requirements that prohibit the installation of panels.

- A Class 2 building must facilitate the future installation of on-site renewable energy generation and storage equipment. The main electrical switchboard of a Class 2 building must contain at least 2 empty three-phase circuit breaker slots and 4 DIN rail spaces labelled to indicate the use of each space for a battery system.

- A carpark associated with a Class 2 building must be provided with electrical distribution boards dedicated to electric vehicle charging. Electrical distribution boards must a) be equipped with a charging control system with the ability to manage and schedule

charging of electric vehicles in response to total building demand and b) be sized to support the future installation of a 7 kW (32 A) type 2 electric vehicle charger in 100% of the car parking spaces.

The Net Zero Commission 2025 consultation paper states that *"electrification raises a range of equity issues, such as customers remaining on the gas network being more exposed to the cost of maintaining it"*. According to AEMO, NSW is unlikely to be able to service projected (or existing) levels of demand affordably[18] and recently, Jemena has warned that their gas network may become stranded in the future, with potential implications for customers who remain dependent on gas. Solar Citizens echoes the advice made by a cohort of concerned peak bodies to stop the growth of stranded gas assets and reduce the number of new gas connections being made. We recommend prioritising bans on gas in new apartments and strata in the first instance, as these building types are more challenging and costly to electrify after construction.

Recommendation 19.3: Adopt the NCC 2025

Timeframe: October 2026

Details: The NSW Government must adopt the new energy efficiency requirements under the 2025 National Construction Code, under the State's BASIX regulations or via another suitable planning instrument, by no later than 1 October 2026.

Recommendation 19.4: Permanently ban gas in new strata developments

Timeframe: October 2026

Details: The NSW Government must take action to prevent new gas connections being installed in all new residential and commercial developments - including for hot water heating, cooking, heating and cooling. We recommend that, following an urgent moratorium in 2025, the NSW Government implements a permanent ban on new gas connections in all new multi-dwelling residential and commercial developments by 1 October 2026, in line with the date of adoption of the next instalment of the National Construction Code in NSW.

Recommendations for existing homes

In addition to better regulations for new developments, the NSW Government must take action within the current term to enable the transition of all existing homes - including private rentals, social housing and apartments - to get off gas, and install CER in the most affordable way and as soon as possible.

[18] Gas Statement of Opportunities report (2024) Australian Energy Market Operator

The NSW Government has taken a lead role in developing the National Australian Built Environment Rating System (NABERS) with Stage 1 ready to be trialled as of 8 July 2025. This trial will take place as part of NSW's introduction of voluntary home energy rating disclosure of properties at the point of sale or lease, expected in the second half of 2025. NSW must continue this leadership by transitioning to mandatory disclosure and implementing Minimum Energy Efficiency Standards as soon as possible.

We acknowledge that the NSW Government has implemented a number of policies and programs to address energy equity issues and improve access to CER for locked out households. Some of the notable existing or past strategies and funding programs include:

- $175M Social Housing Energy Performance Initiative (SHEPI) (co-funded with Federal Government)
    - 24,000 social housing homes to be upgraded by June 2027
- $25M Solar for Apartment Residents (SoAR) Program (co-funded with Federal Gov.)
    - Estimate 500 strata schemes to benefit in the 2025-26 financial year[19]
- $10M Electric Vehicle Ready Buildings grants for apartments (funding exhausted)
    - Min. 125 strata schemes benefitted
- Changes to Strata Law to make energy efficiency upgrades easier, including reducing the 75% vote requirement to 50%, and new legislation to disallow owners corporations from objecting to energy efficiency and sustainability upgrades on the basis of appearance

The NSW Consumer Energy Strategy sets out fifty actions to be delivered within the current term of government. Notable commitments to be delivered by the end of 2025 include:

- Investigate introducing minimum energy efficiency performance standards for rental housing.
- Introduce voluntary disclosure of home energy performance ratings at the point of sale or lease in 2025, beginning with trials. The policy will be reviewed to inform when to transition to a mandatory disclosure scheme.
- Design and deliver a new Home Energy Saver program to help customers cut their energy bills and reduce their emissions.
- Review the Energy Savings Scheme and Peak Demand Reduction Scheme and consider options to enhance the schemes to help deliver the NSW Consumer Energy Strategy targets and objectives.
- Conduct a review of NSW energy rebates to streamline existing rebates, improve the customer experience and ensure support reaches customers who need it most.
- Set targets for 2035 and 2050 to achieve significant improvements in the energy performance of existing homes in NSW.

[19] Based on a 50% contribution towards $100,000 total solar installation cost. Min. 166 schemes to benefit

Then, by 2026:

- Pilot the roll-out of solar and battery virtual power plants and full home electrification with select social housing premises.
- Introduce a right to install EV chargers in the Strata Schemes Management Act 2015 so owners' corporations cannot unreasonably refuse EV chargers.
- Set targets for 2035 and 2050 to increase electrification of existing homes and small businesses in NSW.
- Develop a NSW Gas Decarbonisation Roadmap.

Noting these commitments, Solar Citizens puts forward the following recommendations to build on and complement this work.

Recommendation 19.5: Launch a plan for Getting Off Gas

Timeframe: June 2026

Details: By June 2026, the NSW Government's Gas Decarbonisation Roadmap must provide a clear strategy and ambitious timelines for the electrification of existing homes and businesses, with new funding committed in the 2026-27 annual budget to deliver on the objectives of the roadmap and ensure all households can access financial support in the form of rebates and no-interest loans.

Recommendation 19.6: Implement Minimum Energy Efficiency Standards

Timeframe: January 2026

Details: The NSW Government must implement Minimum Energy Efficiency Standards for all new and existing rental properties as soon as possible, following the 2025 introduction of voluntary disclosure of home energy ratings at the point of sale or lease. Minimum Energy Efficiency Standards should be either features or performance based (i.e., following the NABERS rating tool), and should include requirements for clean energy solutions including rooftop solar and all-electric appliances, as well as energy-efficient heating and cooling.

The new standards should be rolled out alongside targeted funding committed in the 2026-27 annual budget to support landlords facing hardship or other difficulties to upgrade their properties in line with the new standards. The standards should also be rolled out with a suite of advice and support for owners of apartments where making efficient and electrification upgrades will be technically challenging or require a whole-of-building approach.

Recommendation 19.7: Implement mandatory disclosure of home energy ratings

Timeframe: January 2027

Details: The next step after voluntary disclosure and Minimum Energy Efficiency Standards is mandatory disclosure of home energy ratings for all new and existing properties at the point of sale or lease.

We recommend that a mandatory disclosure policy includes a requirement that home energy ratings of occupied rental properties must also be disclosed to the current tenant/s living there.

Question 20:

How could social equity be better addressed in the transition to an electrified built environment?

As highlighted throughout this submission, certain households and groups within the NSW community face barriers to accessing the bill saving benefits of CER, electrification and efficiency upgrades. We know that these groups are renters, apartment residents and social housing tenants, and it's important to look into other interlinked demographic factors when considering policies to improve energy equity, and how these might influence social equity more broadly.

In NSW:

- 41% of apartment residents were born in Australia[20], vs 65% in the total NSW population[21]
- Less than half (47%) speak English at home, compared to 68% of the total NSW population
- 56% of occupied apartments are rented, compared to 17% owner-occupied
- 47% of apartment residents are aged between 20-39, with a further 16% under 20.
- 60% of renters are aged under 35[22]
- Aboriginal and Torres Strait Islander people are less likely to own their own home compared to the rest of the Australian population (42% compared to 67%)

Apartments & Strata

In NSW, 16% of the population live in apartments which is more than the national average of 10%, Solar Citizens finds that rooftop solar could save apartment residents ~$530 per year on energy bills[23]. However, less than 2% of NSW's apartment buildings have solar installed[24] compared to over 30% of residential houses[25].

Many NSW households are opting to electrify and install rooftop solar, storage and EV charging, but apartment residents wishing to do the same face barriers that prohibit consumer choice. Compared to standalone homes, electrification retrofits in multi-dwelling strata buildings are typically more challenging and therefore more costly. In NSW, 56% of occupied apartments are rented[26] and this presents additional barriers due to the split incentive between renters and landlords in the context of apartment buildings.

Apartment buildings with up to 55 units are eligible for rebates delivered under the SoAR program, which provides a solution for low and mid-rise housing, but excludes many high-rise buildings. Compared to standalone dwellings and low to mid-rise buildings, high-rise apartments are often more challenging to electrify and decarbonise due to the high energy consumption

[20] 2025 Australaisan Strata Insights Report
[21] 2021 Census, ABS
[22] Home ownership and housing tenure - Australian Institute of Health and Welfare
[23] Solar Potential Report (2024) Solar Citizens
[24] Solar for apartment residents| NSW Climate and Energy Action
[25] Home solar systems | NSW Climate and Energy Action
[26] 2024 Australasian Strata Insights Report (2025) - *56% of all occupied dwellings (excludes unoccupied dwellings)*

from common property and shared facilities[27]; technical barriers such as limited roof space for the applications of rooftop renewable energy technologies to serve the energy needs of the residents[28]; challenges with shared ownership; and absence of a regulatory framework.

Recommendation 20.1: Support existing strata buildings

Timeframe: June 2026

Details: The NSW Government must support the electrification and CER uptake of existing strata-titled properties, especially mid and high-rise residential apartment buildings which can be more challenging to retrofit compared to other building types.

We recommend that the NSW Government consider introducing additional measures to drive electrification and CER uptake in strata and apartment buildings, with additional funding committed in the 2026-27 annual budget to deliver on the following:

a) Rebates to support the uptake of solar and/or other discounted clean energy solutions in buildings with over 55 units,
b) Rebates to support the uptake of electric vehicle charging infrastructure in all multi-dwelling residential buildings, and
c) Free or discounted consultation services for hard-to-retrofit multi-dwelling residential buildings including high-rise and older buildings.

Renters

We note that in 2025, the NSW government plans to a) conduct a review of NSW energy rebates to streamline existing rebates and ensure support reaches customers who need it most, b) design and deliver a new Home Energy Saver program to help customers cut their energy bills and reduce their emissions and c) review the Energy Savings Scheme and Peak Demand Reduction Scheme and consider options to enhance the schemes. We also note the government's plans to set 2035 and 2050 energy performance and electrification targets for existing homes (as per the Consumer Energy Strategy).

As part of this process, we strongly recommend that renters are prioritised for the development of new policies and funding programs, and that wherever possible, existing rebate programs are enhanced to ensure renters and other locked out households can benefit. Taking the 'carrot and stick' approach, minimum energy efficiency requirements with mandatory disclosure should be rolled out with financial support such as rebates, no-interest loans or incentives for landlords.

We also recommend that ambitious targets are set for energy performance, electrification and CER uptake including rooftop solar in rental properties.

[27] Zero Carbon Australia Buildings Plan (2013) Beyond Zero Emissions, Melbourne Energy Institute
[28] Feasibility of ZNE by Building Type and Climate (2017) ASHRAE Journal

Recommendation 20.3: Deliver clean energy for renters

Timeframe: June 2026, to deliver targets by 2035 - 2050

Details: The NSW Government must take action to unlock clean energy for the one-third of the population who are currently excluded from the full cost-saving benefits of CER and household electrification because they are renting. In addition to implementing Minimum Energy Efficiency Standards and Mandatory Disclosure, the NSW Government should commit targeted funding to increase rooftop solar uptake on rental properties. This funding should be delivered in the 2026-2027 annual budget to kickstart solar for renters towards the 2035 target.

We recommend that the NSW Government sets a target of 30% of rental properties to have rooftop solar by 2035, and all new and existing rental properties by 2050.

Social Housing

The NSW Government has committed to a) upgrade 24,000 of NSW's 125,000 social homes by 2027, and b) pilot the roll-out of solar and battery virtual power plants and full home electrification with select social housing premises in 2026. Both of these commitments are a huge step in the right direction, but it is unclear whether there is a longer term goal in mind.

In-keeping with the plan to set targets in 2025 and 2026, for household energy performance and electrification by 2035 and 2050, we recommend that specific targets be set for all social housing properties, building on the achievements of the SHEPI program and the learnings from the 2026 pilots.

Recommendation 20.2: Electrification & CER upgrades for all social homes

Timeframe: June 2026, to deliver targets by 2035 - 2050

Details: The NSW Government must set ambitious targets for all social homes within the state to be upgraded to be fully electric, energy-efficient, and powered by on-site rooftop solar and behind-the-meter battery storage connected to a VPP wherever feasible and appropriate.

We recommend that by 2035, 30% of all social homes are fully electric with rooftop solar, and that half of these homes (15%) are equipped with battery storage connected to a VPP.

By 2050, this goal should be extended to include all social homes to be fully electric, energy-efficient and have access to clean energy via rooftop solar and, wherever appropriate, battery storage connected to a VPP.

These targets should be set by June 2026, and funding should be committed to achieve these targets from 2027 onwards, once the current SHEPI program is set to finish.

Summary of Recommendations

#	Recommendation	Responsible	By when?
5.1	Communicate the role of CER in the clean energy transition	Net Zero Commission	As soon as practicable
6.1	Unlock C&I solar	DCCEEW	Mar ‘27
6.2	Enable alternative options for mid-scale storage	DCCEEW	Mar ‘27
6.3	Investigate Urban Renewable Energy Zones	DCCEEW	Start Dec ‘25
6.4	Investigate incentives to accelerate uptake of V2G	DCCEEW	Start Dec ‘25
19.1	Place a moratorium on gas in new apartments	Planning	Nov ‘25
19.2	TOD Program to deliver clean energy for apartments	Planning	Nov ‘25
19.3	Adopt the NCC 2025	Planning	Oct ‘26
19.4	Permanently ban gas in new strata developments	Planning	Oct ‘26
19.5	Launch a plan for Getting Off Gas	DCCEEW	Jun ‘26
19.6	Implement Minimum Energy Efficiency Standards	DCCEEW	Mar ‘26
19.7	Implement mandatory disclosure of home energy ratings	DCCEEW	Mar ‘27
20.1	Support existing strata buildings	DCCEEW	Jun ‘26
20.2	Deliver clean energy for renters	DCCEEW	Jun ‘26
20.3	Electrification & CER upgrades for all social homes	DCCEEW	2030-2035

Solar Citizens thanks the Net Zero Commission for the opportunity to make a submission, and we look forward to further engagement and consultation opportunities in the near future. Please don’t hesitate to reach out should you have any questions about the content of this submission, or wish to further discuss the above recommendations.

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