

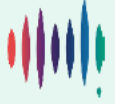
Pathways Call for Evidence Submission

18 July – 14 August 2026

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Disclaimer

This document is a submission to the Net Zero Commission’s 2026 Pathways Call for Evidence. As part of the consultation process, the commission has committed to publishing the submissions it receives. Submissions do not represent the views of the commission.



31 July 2026

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Chair
NSW Net Zero Commission
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Response to Call for Evidence on NSW's first decarbonisation pathways

Dear Mr Rowley,

Energy Consumers Australia (ECA) thanks the NSW Net Zero Commission (NZC) for the opportunity to respond to the Call for Evidence on NSW's first decarbonisation pathways.

ECA is the national voice for household and small business energy consumers. We advocate for a fair, affordable, and reliable energy system – one that meets everyone's needs and leaves no one behind on the journey to net zero.

We conduct regular research on a wide range of topics relevant to the Commission's work, including:

- consumer sentiment towards the energy market and the energy transition,
- barriers to electrification and adoption of Consumer Energy Resources (CER),
- energy hardship,
- gas network decommissioning,
- electrification,
- electric vehicles,
- renter disadvantage, and
- other related topics concerning consumers and the energy market.

Noting your request for evidence and data, we have prepared an annotated bibliography of ECA's relevant consumer data, research reports, and commentaries published in the last 12 months; with key findings and recommendations of most relevance to NSW's first decarbonisation pathways.

We are very happy to discuss any of these pieces of research in a follow-up meeting. If you have any questions about this submission, please contact Justin Whelan at

Yours sincerely,

Justin Whelan
Manager, Consumer Advocacy



Annotated Bibliography of recent ECA Research Reports

Consumer Energy Report Card (June 2026)

Publication date: latest version was released on 16 July 2026

NZC Sector Focus Areas: Adoption of Consumer Energy Resources, Transitioning to electric vehicles, Electrification of residential and commercial buildings, Improving energy efficiency measures, Equity in the electricity transition.

Summary:

The Consumer Energy Report Card is a 6-monthly nationally representative survey of over 4,000 households. It aims to understand Australian energy consumers' priorities, needs, attitudes towards and engagement with the energy system. As well as a public report, we also make the topline data (anonymised) available to anyone with an interest in energy consumer policy, which include NSW breakdowns for all responses.

Key Findings:

A few example findings of direct relevance to your consideration of “opportunities and barriers to addressing socio-economic priorities for a just transition” are highlighted below.

- Understanding and participating in the energy transition:
 - Only 56% of NSW residents clearly understand why Australia is transitioning to clean energy.
 - Only 24% believe the Government and other groups have clearly explained how the energy transition will affect households like theirs.
 - 18% plan to cancel their gas connection entirely within the next 10 years.
 - 38% are likely to consider an electric vehicle for their next vehicle purchase or lease.
- Energy bill stress:
 - 80% of NSW residents are extremely or quite concerned about the cost of electricity.
 - 31% have had difficulty paying their electricity bills in the last 6 months.
 - 16% were unable to pay an energy bill on time due to financial difficulties in the last 12 months.
 - 61% have avoided heating and cooling to manage bills in the last 12 months.

Link: <https://energyconsumersaustralia.com.au/our-work/surveys/consumer-energy-report-card-data>



Understanding household barriers to residential solar and battery uptake and the potential for growth

Publication date: 24 May 2026

NZC Sector Focus Areas: Adoption of Consumer Energy Resources, Equity in the electricity transition.

Summary:

Our report applies a well-established behavioural framework to unpack how consumer capability, opportunity and motivation are influencing solar and battery adoption.

Key findings:

- At least half of Australian households face at least one structural barrier to adopting solar and batteries. These barriers are living in a rental property, living in an apartment, or having an annual household income of less than \$50,000.
- Renters account for the largest share of households facing these barriers.
- Households that say they understand why Australia is transitioning to renewable energy are more likely to adopt batteries.

Link: <https://energyconsumersaustralia.com.au/our-work/surveys/understanding-household-barriers-residential-solar-battery-solar-uptake>

Power Move: Fair and affordable electrification for Australian households and small businesses

Publication date: 30 April 2026

NZC Sector Focus Areas: Adoption of Consumer Energy Resources, Electrification of residential and commercial buildings, Improving energy efficiency measures, Equity in the electricity transition.

Summary:

Our report looks at how to manage the transition away from gas so it's fair and affordable for all consumers - those who can electrify their homes and businesses today, as well as those who face barriers to doing so.

Key findings:

- Household and small business gas consumers will face escalating gas bills as gas demand declines. Australian household and commercial gas use is expected to decline by 79% by 2045 and to be largely non-existent by 2050 as households and small businesses electrify and leave the gas network.
- As more people leave the gas network, fixed network costs will be recovered from a smaller number of consumers, driving gas bills higher for those who remain on the network.



- Electrification can unlock significant long-term bill savings for households and small businesses. In NSW, modelling indicates that a typical Sydney household can save between \$812 and \$936 per year by transitioning to efficient electric appliances.
- However, the ability to access these savings or avoid escalating gas network costs is unevenly distributed, as consumers face different barriers; for some these are financial, but for the 40% of households who rent or live in multi-unit buildings the barriers are structural.
- Without a clear plan and dedicated assistance to overcome these barriers to electrification, these households and businesses will be left absorbing an escalating share of network costs they cannot avoid. Consumers in vulnerable situations who may not be able to afford these costs will be hardest hit.

Recommendations for NSW:

- Establish an ambitious NSW electrification target and Gas Decarbonisation Roadmap by the end of 2026, as committed in the NSW Consumer Energy Strategy.
- Work with the Commonwealth and other state and territory governments to develop a National Electrification Roadmap that sets out a plan for achieving targets collaboratively across all jurisdictions, and publicly report against the targets.
- Ensure Minimum Energy Efficiency Rental Standards (MEERS), currently being considered by the NSW Government, mandates that landlords install efficient electric appliances when a gas appliance fails in rentals.
- Mandate disclosure of energy performance ratings of properties at point of lease and sale, as already committed to.
- Update model by-laws to support electrification in multi-unit dwellings, building on the amendments to strata legislation enacted in 2025 to support sustainability upgrades.
- Expand the Social Housing Energy Performance Initiative (SHEPI) to retrofit all social and community housing to be fully electric and high performing.
- Provide targeted support for small business electrification.
- Amend the State Environmental Planning Policy (Sustainable Buildings) 2022 (NSW) to require all new household and small commercial buildings to all-electric.
- Set a clear end date for gas appliances for households and small businesses.
- Provide support to reduce the cost consumers face when disconnecting from the gas network.
- Actively plan for how gas network costs will be shared fairly between consumers, networks and their investors, and taxpayers through the transition.
- Work with the Commonwealth and other state and territory governments to plan for these costs; consider initiating an independent inquiry (for example by the Productivity Commission or another appropriate body) to ensure these issues can be considered holistically at a national level.
- Begin actively exploring and taking a lead role with networks in planning strategic decommissioning of sections of the gas network, including developing a Decommissioning Framework.
- Make legislative amendments to remove existing barriers to strategic decommissioning.

Link: <https://energyconsumersaustralia.com.au/our-work/research/power-move>



Australians want a fairer energy market, and they expect providers to step up

Publication date: 01 April 2026

NZC Sector Focus Areas: Equity in the electricity transition, Consumer Protection.

Summary:

For years, the Australian energy market has operated under an unspoken rule: if you stay with the same provider, you pay more. This so-called “loyalty tax” has meant long-term customers are often charged hundreds of dollars more, while new customers receive the best deals for the exact same service. New national research, commissioned by Energy Consumers Australia, shows Australians overwhelmingly view this practice as unfair. It also reveals strong support for shifting responsibility onto energy providers to ensure people are on suitable, good-value plans.

Key Findings:

- There is evidence of a “loyalty tax”, with customers on plans older than two years paying, on average, \$317 more per year than those on newer offers.
- 75% of consumers said this is unfair from the perspective of a loyal customer; 67% said it is unfair even from the perspective of a new customer benefiting from the lower price.
- 69% of consumers believe energy providers should be required by law to ensure their customers are on an energy plan that is suitable for them and offers good value.
- These findings reinforce the need for a duty to consumers in the energy market (a consumer duty), which Energy Ministers have agreed to further consult on in 2026.

Link: <https://energyconsumersaustralia.com.au/news/australians-want-fairer-energy-market-expect-providers-step-up>

What small businesses are telling us about electrification – and what needs to change

Publication date: 22 January 2026

NZC Sector Focus Areas: Adoption of Consumer Energy Resources, Electrification of residential and commercial buildings, Improving energy efficiency measures.

Summary:

Electrification is often considered a technical task: swap out a gas appliance, put in an electric one, and the job is done. But for small businesses, the reality can be very different. Every decision involves risk, cost, disruption to operations, all while keeping customers and staff happy.



To better understand the opportunities and challenges small businesses face, we spoke with five businesses across distilling, early learning, hospitality and advisory services operating in shared commercial spaces.

Key findings:

- Small businesses need more support to decarbonise by electrifying their appliances.
- Motivation wasn't the only barrier to electrification.
- Structural barriers were constraining the ability to electrify.
- Information was difficult for these small businesses to access, trust and use.
- Financial risk sitting squarely with the business owner is a major barrier.

Link: <https://energyconsumersaustralia.com.au/news/what-small-businesses-telling-us-about-electrification-what-needs-change>

New research underlines need for minimum energy efficiency standards for Australia's rental properties

Publication date: 04 December 2025

NZC Sector Focus Areas: Adoption of Consumer Energy Resources, Electrification of residential and commercial buildings, Improving energy efficiency measures, Equity in the electricity transition.

Summary:

Data from the December 2025 Consumer Energy Report Card shows that renters are more likely than homeowners to say they are avoiding heating and cooling to save money, more likely to struggle to keep their homes at a comfortable temperature, and far less likely to have insulation. This demonstrates the need for minimum energy efficiency standards for Australia's rental homes.

Key findings:

- 70% of renters are avoiding heating and cooling their homes to save money.
- 40% of renters say they cannot keep their home at a comfortable temperature without using a lot of energy.
- 78% of owner-occupied homes have at least one form of insulation, but only 36% of rentals do.
- 65% of Australians support the introduction of minimum energy efficiency standards in rental homes.

Link: <https://energyconsumersaustralia.com.au/news/new-research-underlines-need-minimum-energy-efficiency-standards-australias-rental-properties>



Exploring a consumer duty for Australia's energy market

Publication date: 05 November 2025

NZC Sector Focus Areas: Equity in the electricity transition, Consumer Protection.

Summary:

As Australia's energy system evolves, there's growing support for a new approach to consumer protection – one that shifts responsibility from consumers to providers. We have commissioned research to explore the concept of outcomes-based regulation in essential services and the opportunities that may lie ahead for our energy future.

A preliminary report by Jeannie Marie Paterson and Evgenia Bourova (Melbourne Law School) explores the concept of outcomes-based regulation in essential services. Additional reports by Jeannie Marie Paterson, Lauren Willis and Evgenia Bourova (Melbourne Law School), examine how a consumer duty could be designed and applied in practice to improve outcomes for energy consumers.

Key Findings:

- The current regulatory framework fails because the burden lies on the consumer to constantly shop around to avoid overpaying, navigating the complexities of the energy market. This needs to fundamentally shift from consumer to the energy service/product provider.
- A consumer duty is also critical to adapting to the rapid integration of CER such as solar, batteries and VPPs because rather than focusing on specific technologies, it empowers regulators to protect consumers from emerging risks without waiting for new prescriptive rules to be legislated.

Link: <https://energyconsumersaustralia.com.au/our-work/research/exploring-consumer-duty-australias-energy-market>

Understanding and measuring energy hardship in Australia

Publication date: 28 July 2025

NZC Sector Focus Area: Equity in the electricity transition.

Summary:

Energy hardship is a pressing and systemic issue that demands urgent attention. Without decisive policy action, many Australians will continue to face unaffordable energy costs, unsafe living conditions, poor health outcomes, and sustained financial stress.

This report digs into survey data from our Consumer Energy Report Card to reveal the experiences and attitudes of people who may be experiencing, or vulnerable to, energy hardship.

**Key findings:**

- Around 1 in 5 households are vulnerable to, or experiencing, energy hardship. More than 1 in 10 households report spending more than 6% of their income on energy bills
- Most households vulnerable to, or experiencing, energy hardship have very high energy bills.
- Renters are disproportionately more likely to be vulnerable to, or experiencing, energy hardship across all hardship indicators.

Link: <https://energyconsumersaustralia.com.au/our-work/surveys/consumer-energy-report-card-understanding-measuring-energy-hardship-australia>

Creating accessible and affordable public EV charging networks for Australia

Publication date: 24 July 2025

NZC Sector Focus Area: Transitioning to electric vehicles.

Summary:

This report makes initial recommendations on the roles, responsibilities, and regulatory settings for ensuring Australia's public EV charging infrastructure (EVCI) is affordable and accessible for all consumers, including renters, those in regional areas, without off-street parking, and apartment dwellers.

Key Findings:

- EV uptake is accelerating, but public chargers are unevenly spread across Australia, likely reflecting socioeconomic factors and the availability of home charging.
- Local government has an important role, and all three levels of government need to collaborate for a fast and efficient rollout of EVCI.
- Market failures are preventing the rollout of public EVCI by the private market
- Under very specific circumstances, there may be a role for DNSPs to provide public EVCI where there is evidence of market failure, but there are long-term risks to competition from allowing large scale ring-fencing waivers.

Link: <https://energyconsumersaustralia.com.au/our-work/research/report-houstonkemp-creating-accessible-affordable-public-ev-charging-networks-australia>