

Executive Summary

This brief provides an overview of factors driving energy hardship nationally and in the ACT. Though many of the recommendations provided are applicable to other jurisdictions, they are largely directed towards ACT decision makers. While the ACT leads Australia in the clean energy transition, much work remains to make this transition equitable.

Energy Hardship

Energy is vital for human survival. Energy hardship exists when a person cannot use energy to live a comfortable and healthy life without suffering negative consequences such as social isolation, hunger or debt.¹

Drivers of Energy Hardship

Energy hardship in Australia is worsening both in terms of the number of households suffering and the depth of their suffering.² Between March 2021-2024, the ACT saw a 78% increase in the number of people in energy hardship programs.³

Factors driving this increase in suffering include:

- 1. High Energy Prices:** Energy prices have risen faster than wages in the last 20 years. Recent years have seen significant rises in energy prices. Electricity prices rose by 14% across regions between September 2022 and 2023. ACT households have seen gas bill increases of 11%, (\$265) since July 2023.
- 2. Inefficient Homes:** Poorly built homes cost more to heat & cool. 70% of Australian households are experiencing significant building issues. Households can save \$1,536 - \$3,872, a year with energy efficient electrified homes.
- 3. Insufficient Income:** Despite using less energy than people on higher incomes, people with lower incomes must sacrifice a greater portion of their income to energy bills. They are also likely to be living in inefficient homes that cost more to heat and cool. Often, they cannot afford solar panels or home improvements, which could reduce their expenses in the long term, trapping them in a cycle of high costs.
- 4. Rental Tenure:** Rentals are more likely to have building issues, which drive up energy bills. 76% of renters under heat or cool their homes to avoid high energy bills, risking their health. Installation of solar or other energy cost reducing measures is lower due to the split incentive problem - when the costs of installing are borne by landlords, but the immediate benefits are enjoyed by renters.
- 5. Poor Retailer Behaviour:** Poor retailer practices lead to higher bills. Practices such as providing incomprehensible billing information or inadequately staffing call centers needed to help people find better energy deals can lead to higher bills. Retailers are also poorly incentivized to help people remain connected to energy when they are in payment difficulty.
- 6. Market Complexity:** 79% of households are overpaying for energy. Needless complexity of the market is a contributing factor. To get a good outcome consumers must constantly monitor frequently changing offer prices, contract terms, incomprehensible bills, complex tariffs, and renewable energy implications.
- 7. Personal Circumstances:** Personal circumstances may increase a person's risk of experiencing energy hardship by increasing their energy usage needs or making it hard for them to engage with the energy market and services. Illness, for instance, may increase a person's need for energy for life saving devices.
- 8. Inadequate Supports:** Poorly designed energy concessions, underfunded initiatives, lack of support for households facing long-term hardship, and overly narrow/siloed energy hardship initiatives all undermine efforts to address energy hardship effectively. These structural shortcomings restrict resources from reaching those most in need, create inefficiencies, and fail to address the broader socioeconomic factors driving energy hardship, resulting in fragmented and often insufficient relief for affected households.

Impacts of Energy Hardship

Poor Health

Living in homes that are too cold or too hot can lead to poor mental health, asthma, heat stress, hypothermia and worsen chronic health conditions. People may also cut back on health spending such as medical care.

Death

7.71% of deaths can be attributed to non-optimal temperatures.⁴ A 2019 report found at least 42 people had died from cold housing conditions in the ACT annually.⁵

Homelessness

Accumulating energy debts can lead to eviction if individuals are unable to pay both rent and utility bills, increasing the risk of homelessness.

Social Isolation

Individuals with high energy debts may withdraw from social activities and community engagement due to financial constraints and stress. Many report going to bed early in the evening with a hot water bottle because they can't afford heating.



Poor Educational Outcomes

Distress caused by high energy debts can affect educational outcomes for children. Some parents report children stay home from school because they are too distressed by the impact of disconnections. Parents may also find it difficult to afford extras needed for schooling.

Eat Heat Compromise

To afford energy many people in hardship cut back on food spending, choosing to go without or purchasing nutritionally poor food.

Debt

People with high energy debts may see their credit scores affected reducing their ability to take out home loans.

Compromised Financial Security

Energy debts can erode savings and retirement funds, jeopardizing long-term financial security for older adults.

Recommendations

1. Establish further standards to define baseline energy efficiency requirements for rental properties.
2. Incentivise landlords to improve the energy efficiency of rental homes.
3. Reform retailer hardship obligations to ensure the main focus is preventing and alleviating hardship as opposed to the current focus of debt management and compliance.
4. Accelerate deployment of measures funding quick fix or moderate energy efficiency upgrades for low-income households.
5. Develop solutions targeting those in long-term energy hardship.
6. Raise the level of ambition to end energy hardship by setting targets for ending energy hardship.
7. Review the Electricity, Gas and Water Rebate (utilities concession) to review its effectiveness in assisting those in energy hardship.
8. Improve cross portfolio cooperation to address wider social factors contributing to energy hardship.
9. Adequately fund and review functioning of the ACT Energy Support Voucher Scheme.
10. Increase funding to ancillary supports such as financial counselling services.
11. Establish a one stop shop with case management services to streamline the process of home energy upgrades and electrification for priority populations.
12. Ensure people who are vulnerable to energy hardship have a voice representing their needs at critical junctures of the energy transition.

Drivers of Energy Hardship

What is Energy Hardship?

People need energy to live. Energy hardship occurs when individuals are unable to access or use sufficient energy for a comfortable and healthy life without facing adverse outcomes, such as financial strain or going without essentials like food.⁶

The greater a person’s exposure to drivers of energy hardship the greater their risk of experiencing energy hardship.

What are the drivers of Energy Hardship

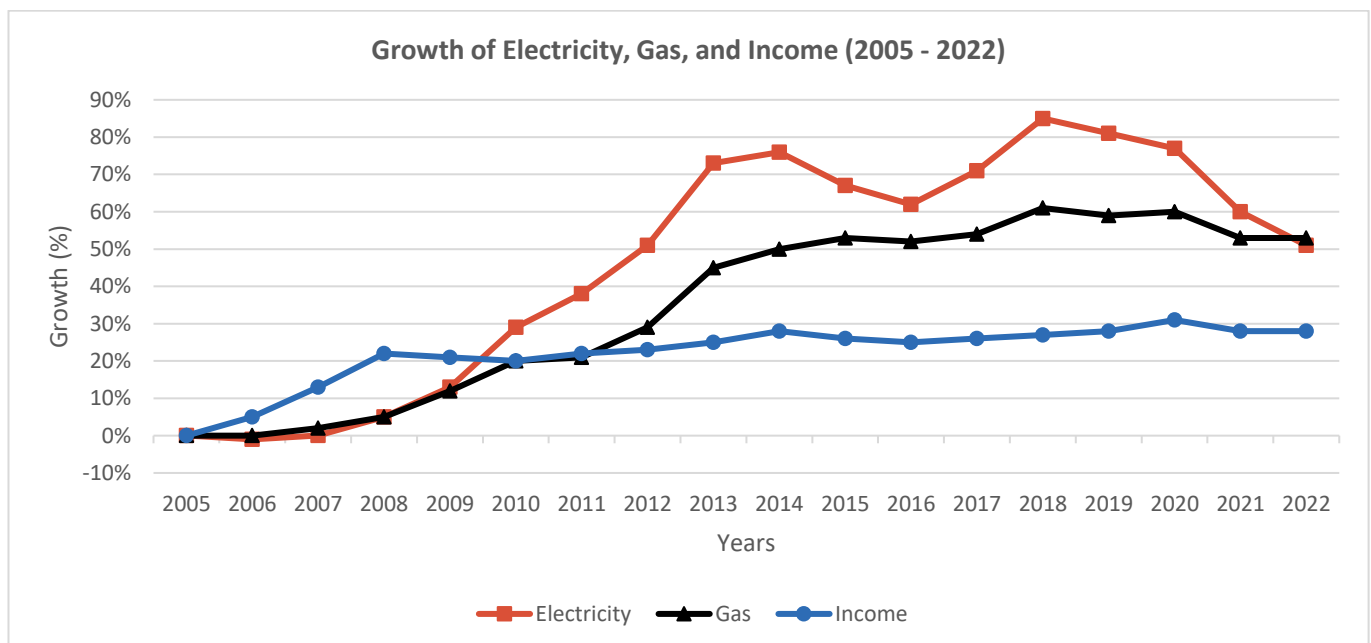
Energy hardship in Australia is worsening both in terms of the number of households suffering and the nature of their suffering.⁷ The multitude of factors driving energy hardship in Australia means that no single policy solution will suffice, instead, a combination of targeted policies will be necessary to effectively address this complex issue.

This section lists the key drivers of energy hardship in the ACT and Australia and recommendations to address them.

1. High Energy Prices

Over the past 20 years, energy prices have risen faster than wages,^{8,9} reducing energy affordability for many. An Energy Consumer Sentiment Survey (June 2024) revealed 64% of renters and 42% homeowners are more worried about their ability to pay electricity bills compared to a year ago.¹⁰

Figure 1



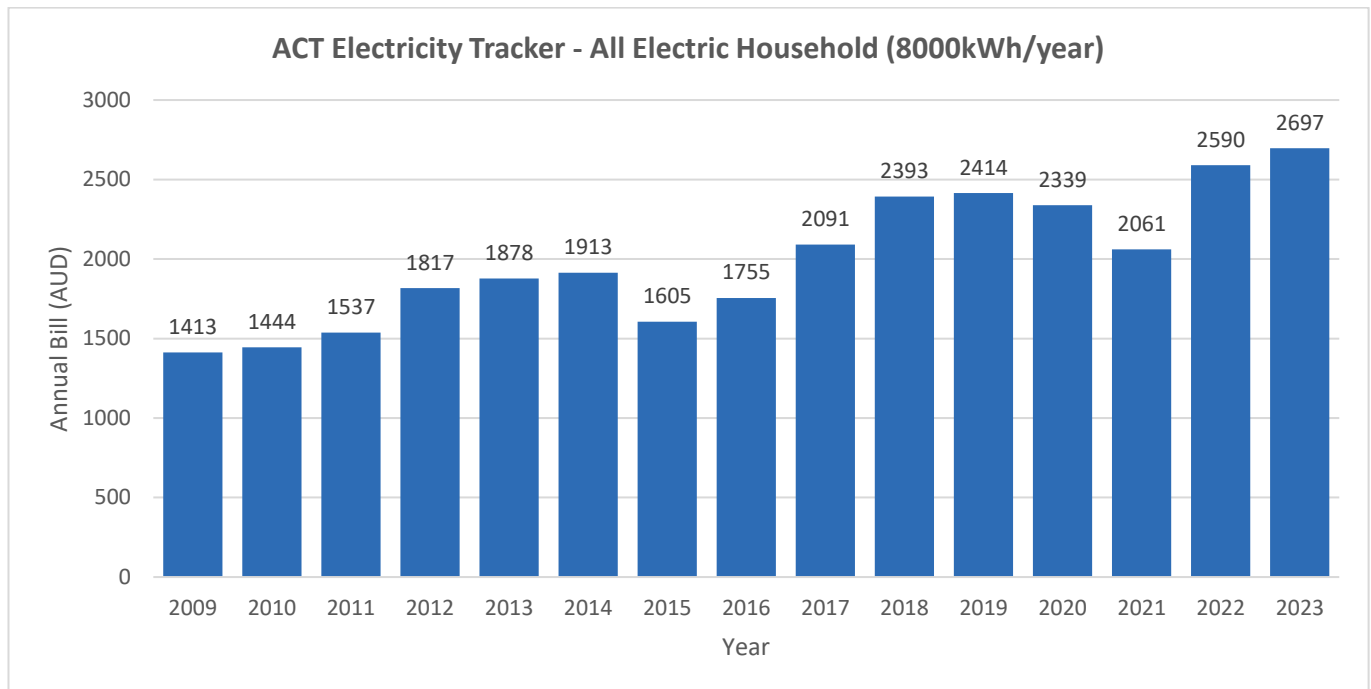
Note: Inflation Adjusted. Source: Australian Energy Regulator, State of the Energy Market Report 2023¹¹

This increase in energy prices has been especially pronounced in recent years, with data from ACCC showing a 14% rise in retail electricity prices across regions between the last two quarters of 2022 and 2023.¹²

The national trend of increasingly high energy prices is echoed in the ACT. Annual household gas bills for ACT households have increased by an average of \$265, i.e. 11%, since July 2023.¹³ The typical annual gas bill for households’ is between \$1709 and \$2514 depending on the retailer used.¹⁴ This price is expected to increase sharply in the years leading up to 2045 – ACT’s target for transitioning households off gas.

The average all electric ACT household has also seen bill increases of 13% since July 2023.¹⁵

Figure 2



Based on tariff tracker data from St Vincent De Paul¹⁶

2. Energy Inefficient Homes

Poorly built homes with energy inefficient appliances cost more to heat and cool. A home with poor airtightness can increase energy bills by 20%,¹⁷ while adequate roof and ceiling insulation can save at least 45% of heating.¹⁸

Unfortunately, poor building quality, and low environmental performance is widespread in Australia's housing stock.¹⁹ A 2022 national survey revealed that at least 70% of households were experiencing one or more significant building.²⁰ More than 81% of homes in temperate Australia fall below the World Health Organization's minimum recommended temperature for optimal health.²¹

Australian homes require more energy to heat and offer less protection from the cold than homes in cold climates, largely due to low building standards.²² Among newly built homes only 1.5% meet the optimum standards for economic and energy efficiency,²³ while over 70% of existing homes received a NATHERS energy rating of 3 stars or lower.²⁴ The NATHERS system goes up to 8 stars or more. A 4-star home requires half of the energy needed (per m²) to heat and cool a 2-star home. A 6-star home uses half the energy for heating and cooling as a 4-star home.²⁵

In an average uninsulated home up to 25-35% of heat loss in winter months will occur through the ceiling.²⁶ ²⁷ Up to 40% of a home's heat in winter will be lost through windows and up to 25% of heat loss will occur through uncontrolled draughts.²⁸

3. Split Incentive Problem of Rental Homes

Renters are more likely to live in homes that cost more to heat and cool.²⁹ Renters are also less likely to have technology that can reduce heating and cooling costs in their homes or have control over factors affecting the thermal efficiency of their home (e.g. ceiling insulation). One in four Australian renters cannot comfortably keep warm in their homes, compared to 11% of homeowners and 15% of mortgage holders.³⁰

This is because the immediate expenses and savings associated with energy-efficient upgrades are split between property owners, who have the power to invest in the improvements, and renters, who experience the cost savings.

Ceiling insulation, for instance, can save occupants hundreds of dollars a year,³¹ however only 25% renters nationally reported having adequate ceiling insulation.¹ Similarly only 70% of renters reported having access to ceiling fans, an energy efficient method of cooling,³² while, 30% of renters do not have access to Reverse Cycle Air Conditioners, a more energy efficient heating system.³³

¹ The rate is higher in the ACT (35%) where minimum ceiling insulation standards are being phased in.

These households could be saving up to \$3,872 yearly through electrification and thermal efficiency measures such as installing adequate ceiling/floor insulation, fixing up draughty windows, and plugging up gaps.³⁴ (see Tables 1 and 2 for a breakdown of savings)

Table 1

Annual Savings from Thermal Efficiency Improvements to the Average 2 Star Home (\$)								
Upgrade Type	Adelaide	Brisbane	Canberra	Hobart	Melbourne	Perth	Sydney	National average
Ceiling Insulation	352	107	423	420	250	236	163	279
Wall Insulation	310	94	94	370	220	208	143	245
Draught Sealing	270	82	82	324	322	192	181	214
Ceiling Insulation top up	147	45	176	175	104	99	68	116
Secondary glazing	142	24	171	269	101	56	56	115
Reducing Sub-floor ventilation	83	24	99	98	59	55	38	65
Sealing Wall Cavities	69	21	83	82	46	46	32	55
Total Bill Savings	1226	354	1471	1561	869	783	539	972

Source Climate Change Council, Smarter Energy Use (2022)

For many renters, the cost of heating and cooling these energy inefficient homes to safe and comfortable temperatures is so high they must risk their physical and mental health and cut back on heating and cooling their homes, or they must risk their financial health and spend exorbitant amounts on trying to reach comfortable temperatures. A significant majority of renters—76% nationally and 69% in the ACT—have been forced to cut back on heating and cooling their homes.³⁵

Renters' ability to move to better housing is compromised by record low rental vacancy rates. In the current market renters' ability to negotiate better housing conditions is also limited.

In the ACT where minimum ceiling insulation standards have been introduced there have been no observable impacts on rental market prices or supply.³⁶ While many ACT renters have reported benefiting from these standards, many have also expressed concern over the reliance placed on renters to enforce these standards, due to risks such as landlord retaliation.

Existing schemes offering incentives such as grants and loans to improve home energy efficiency are typically limited to a single property per applicant. This restriction, combined with the "split incentive" issue, often results in landlords prioritising energy efficiency upgrades for their own residences rather than their rental properties. Consequently, renters are less likely to benefit from these programs, perpetuating disparities in access to energy-efficient housing.

Table 2

Annual \$ Savings Generated from Switching from Gas Appliances to Efficient Electric Appliances (\$)

Upgrade Type	Adelaide	Brisbane	Canberra	Hobart	Melbourne	Perth	Sydney	National average
Instant gas hot water heating - High efficiency heat pump	448	689	359	465	431	202	202	437
Gas heating - Electric reverse cycle air conditioning	371	183	604	587	493	35	191	338
Gas cooker - Induction stovetop and electric oven	15	107	20	43	51	0	14	31
Removing daily gas supply fees	215	254	252	215	326	98	229	227
Total bill savings from electrifying	948	1233	1236	1311	1301	302	898	1033
Combined savings from electrification and thermal upgrades	2174	1588	2707	3872	2170	1085	1436	2005

Source Climate Change Council, Smarter Energy Use (2022)

Recommendations

- Introduce further minimum energy efficiency standards for rentals and incentivise landlords to reduce energy costs of their properties, so the burden of poor-quality homes does not fall solely on renters.
- Incentivise landlords to improve the energy efficiency of rental homes.

4. Overly Complex Energy Market

According to the ACCC, 79% of Australian households are overpaying for energy.³⁷ One reason for this is the needless complexity of the energy market.³⁸

In the current system consumers wanting good outcomes must remain constantly vigilant, monitoring frequently changing offer prices, contract terms and assistance measures, while contending with factors such difficult to reach energy providers, incomprehensible energy bills, complex tariffs. Increasingly they need to become savvy energy traders who can evaluate the impact of factors such as the best time to export energy from solar panels and weigh up the costs and benefits of installing home battery systems.

One in four people that considered switching energy plans failed to do so because they found it too confusing, time consuming or hard to determine the best option for them.³⁹

The impact of market complexity is more severe for consumers facing financial stress, with just 51% of financially stressed households feeling confident in their ability to make informed decisions about energy products and services, compared to 75% of those that are financially comfortable. Just 43% of financially pressured consumers feel they have adequate information to make these choices, compared to 65% of those in more stable financial situations.⁴⁰

5. Poor Retailer Practices

Poor retailer practices have been shown to impact consumer outcomes across Australia,⁴¹ with some noting traditional retailers are not well incentivised to help customers reduce their energy usage.

Passive retailer behaviours affecting consumer outcomes include failing to notify customers of overpayments, offering limited upfront information on financial assistance programs, and understaffing call centres, leading to delays for those seeking help with bills or hardship assistance.⁴²

More active negative practices include shifting customers to new tariffs without consent, issuing disconnection threats in unreasonable situations, and providing uneven, hard-to-interpret bills that complicate budgeting. Retailers have also been offering bill-smoothing products that are easy to sign up for online, but difficult to stop. These products shift financial risk to consumers by collecting large sums in advance to cover future bills.⁴³

The impacts of an industry culture that does not prioritize customer well-being can be exacerbated for customers suffering hardship. Hardship program staff are often co-located in debt collection teams or are recruited from debt collection backgrounds rather than social service backgrounds,⁴⁴ leading to approaches that are more punitive than supportive.

Recommendation

- Reform retailer obligations to customers in energy hardship to ensure the main focus is preventing and alleviating hardship as opposed to the current focus of debt management and compliance.

6. Personal Circumstances

Some personal circumstances can increase a person's risk of experiencing energy hardship. Illness for instance may increase a person's usage of energy because lifesaving or health improving devices may require greater energy consumption, a person's health or age may also require their home to be heated to a higher temperature.

Nearly half the Australian population, or 45%, will experience mental ill health at some point in their lives, potentially making them vulnerable to hardship due to difficulties carrying out day to day tasks such as opening mail and answering telephone calls. Similarly, the one in five Australians who have a disability and the many Australians who have literacy levels below what is considered necessary to fully participate in society, may find it difficult to search for and assess the best energy deals. People with disabilities may also find it difficult to keep their energy usage levels to an affordable level without compromising their health.

One in six Australian women have experienced domestic violence. Survivors may need help dealing with debts accumulated in their name as a form of economic abuse or additional account security to protect their personal information. Language barriers may make it difficult for people to identify when they are better energy offers available.

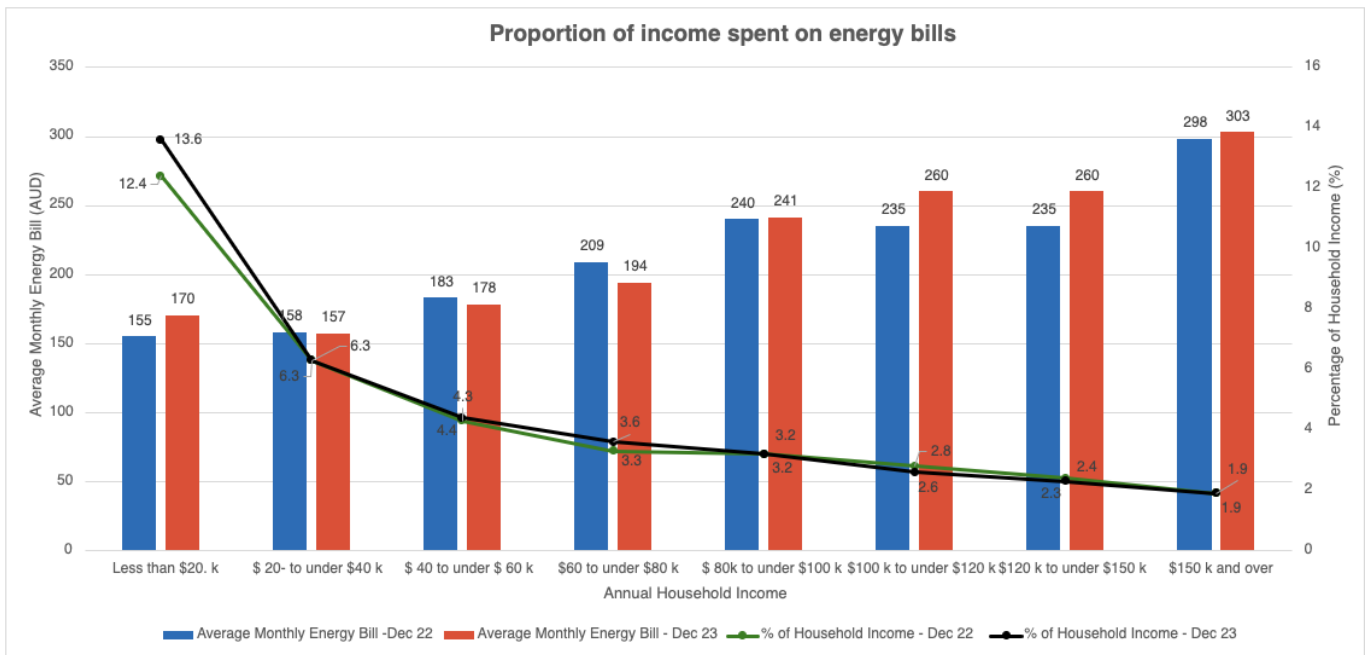
7. Low incomes

Despite consuming less energy than people with higher incomes, people on lower incomes must spend a greater portion of their income on energy, making them more vulnerable to energy hardship.⁴⁵ On average people earning less than \$20,000 a year spend 13.6% of their income on energy. This is 5 times the proportion of income spent by higher income earners on energy.

The cost of home improvements or the purchase of energy-efficient appliances which reduce energy bills is more likely to be cost prohibitive for lower income earners who have significantly less disposable income.⁴⁶ An energy-efficient split system, which costs \$2,450 on average,⁴⁷ is more likely to be unaffordable for the typical ACT lower income household earning less than \$1,333 a week, than for the typical median income household earning of \$2,373 a week.⁴⁸

People with lower incomes are also at greater risk of being left behind as Australia transitions to a new renewable energy system, due to their inability to purchase solar or home battery systems without significant financial assistance. Existing ACT government supports providing such assistance is geared towards owner occupiers. Canberra's lowest income households are more likely to be private tenants than owner occupiers.⁴⁹

Figure 3



Source: Energy Consumers Australia ⁵⁰

Recommendation

- Accelerate deployment of quick fix or moderate energy efficiency upgrades for low-income households.²

8. Inadequate Supports

Existing public supports aiming to reduce energy hardship are not effectively alleviating energy hardship.

The value of energy concessions, and rebates are generally insufficient to move households out of energy hardship.⁵¹ Providing energy concessions and rebates as fixed amounts also fails to account for fluctuations in energy prices, seasonal changes in usage, and differences in home energy efficiency.⁵² This approach results in some households receiving more assistance than needed, while others receive far too little. For instance, a typical dual fuel household in the ACT paying \$5,223 annually would see just 15% of their annual energy bill covered by the \$800 ACT utilities concession while a typical all electric solar household paying \$1,690 would see up to 47% of their bill covered by the same concession.

There are also doubts as to effectiveness of the eligibility criteria for these supports.⁵³ Many who need help are being left out or not getting sufficient assistance, while some who receive concessions receive negative energy bills.

Meanwhile, initiatives addressing the root causes of energy hardship, such as retrofitting homes or boosting energy efficiency, lack the funding, scale, and depth of retrofits required to make a substantial, widespread impact, according to an August 2020 analysis of such programs nationwide.⁵⁴ These programs also frequently exclude renters, public housing residents, social housing tenants, and other groups that are especially vulnerable to high energy costs and inefficient housing conditions.⁵⁵

A 2023 analysis of similar programs in the ACT made similar findings.⁵⁶ The report found up to 25,000 homes in the ACT would require material assistance to transition off gas by 2045 and reduce hardship.⁵⁷ Currently there is no program in the ACT that has funding assigned proportional to the size of the problem. Rental households are also currently excluded under

² A quick fix rollout would consist of energy efficiency upgrades (insulation – ceiling draught proofing, curtains, window shades, and thermal appliances such as an electric heat pump) and electrification (efficient electric hot water, heaters and cooktops). A modest upgrade with solar which would consist of electrification (heat pump, efficient hot water, and cooktops) solar, and energy efficiency upgrades (floor ceiling insulation, draught proofing, window, window coverings)

the eligibility criteria used for the major ACT Government programs providing financial support for these households to electrify.⁵⁸

The lack of adequate support for those in long-term energy hardship is a significant concern, particularly for those affected by enduring factors such as chronic illness or disability, rather than temporary setbacks like a brief job loss. The serious consequences of energy hardship, which include reduced life expectancy, homelessness, and debt, underscore the urgency of this issue. The situation highlights a structural gap in support systems and suggests a shifting of costs between different directorates.

Recommendations

- Develop supports targeting those in long-term energy hardship.
- Set targets for ending energy hardship.
- Review the Electricity, Gas and Water Rebate (formerly the Utilities Concession).
- Improve cross portfolio cooperation to address wider social factors contributing to energy hardship.
- Adequately fund and review functioning of the ACT Energy Support Voucher Scheme.
- Increase funding to ancillary supports.
- Establish a one stop shop with case management services to streamline the process of home energy upgrades and electrification for priority populations.
- Ensure people who are vulnerable to energy hardship have a voice representing their needs at critical junctures of the energy transition.

Recommendations

1. Introduce Further Minimum Energy Efficiency Standards for Investment Properties Being Rented Out as Housing

More Canberrans are in rental housing than ever before. However tight rental market conditions have meant these households are unable to negotiate or move into properties with better housing conditions. Evidence nationally and provided by ACT residents is that rental premises have poorer thermal control than that of owner-occupied households.⁵⁹

The main driver of the issue is market failure caused by split incentives. A minimum mandatory standards approach is required to address this issue and ensure any savings made by landlords by failing to improve the conditions of their properties does not come at the cost of their tenant's physical, mental and financial health.

ACTCOSS recommends the adoption of the *Community Sector Blueprint: National Framework for Minimum Energy Efficiency Rental Requirements* as a guideline for setting and enforcing minimum energy standards in rental properties.⁶⁰ A phased and scalable implementation of these standards, beginning with a features-based approach and gradually moving towards a performance-based system, as outlined in the blueprint, is recommended. Additionally, ACTCOSS emphasizes the importance of establishing a robust system that does not rely on tenants for ensuring compliance. This is due to the power differentials between renters and landlords and the high risk of consequences such as eviction and homelessness that exist for tenants that seek to enforce such standards.

2. Incentivise Landlords to Improve the Energy Efficiency of Rental Housing

To address the split incentive problem, landlords renting to lower income households could be provided with low interest loans to cover energy efficiency improvements and installation of consumer energy resources such as solar panels, on condition these improvements are not used to justify rent increases. The appropriateness of lower land rates for landlords who are renting energy efficient homes to lower income renters should also be explored.

3. Ensure Hardship Programs are People-Centric

Existing retailer hardship obligations should be reformed so the focus is on preventing and alleviating hardship and not just debt management and compliance. This will provide better support to households while reducing retailer compliance burdens. Examples of people-centric measures include offering customer's real-time information on energy usage, using data analytics to identify customers at risk of hardship, putting in place preventative measures early, offering payment products that take in to account a customer's capacity to pay and not require customers to prepay for energy.

4. Accelerate Deployment of Measures Funding Quick Fix or Moderate Energy Efficiency Upgrades for Low-Income Households

The stress of high energy bills and poor housing conditions has left lower income households susceptible to mental and physical health issues. In a business-as-usual scenario many of these households could be left struggling in these homes for decades, increasing the harm suffered.⁶¹

To improve the long-term outcomes of these households, federal, state and territory governments must accelerate energy efficiency upgrades for these households over a 7-year period (2025-2031) These households require financial aid to upgrade. Interest-free loans may not be sufficient.⁶²

Even though interest-free loans reduce borrowing costs, they still require regular repayments. For households already struggling to meet day-to-day expenses, these repayments may be unaffordable, deterring participation. There is also an element of unacceptable risk for low-income households to take out an interest-free loan, since they have no margins if repayments exceed savings on energy bills.

At the national level an accelerated quick fix rollout will cost \$13,581 per household,⁶³ save \$1,650 per year per household⁶⁴ support an average of 7160 jobs per year over this period,⁶⁵ and generate an additional 10 billion in GDP when compared to a business-as-usual scenario.⁶⁶

A moderate upgrade would cost \$24,300 per household, generate an additional \$17 billion in GDP over the rollout period and generate an average of 12,700 additional full-time jobs during the rollout period.⁶⁷ Lower income households can expect to save \$3350 on average per year.

Assistance should be tailored based on the type of housing.⁶⁸ Upgrades for social/public housing should be fully subsidised; Community Housing should receive grants for up to 90% of the cost to upgrade with the rest to be funded through zero interest loans. Upgrades for lower income owners should be funded through a combination of subsidies and zero interest

loans. Lower income rentals should be incentivised to upgrade through low interest loans and minimum efficiency standards, with the possibility of using the land tax system to do so.

5. Develop Supports Targeting Those in Long-Term Energy Hardship

Nationwide, there are no scaled solutions targeting those in long term energy hardship. Existing large scale protection mechanisms such as payment plans, and rebates assume difficulties making energy payments are the result of a relatively minor or temporary financial setback. However, many households face conditions that result in a continuous, and often permanent, inability to afford their energy needs unless significant changes occur - changes such as a substantial increase in income, a significant reduction in energy costs, or an improvement in housing quality and overall household circumstances. These households urgently need effective targeted solutions as their situations continue to deteriorate.

Potential solutions include social tariffs (discounted tariffs retailers must offer to customers in energy hardship, or vulnerable to energy hardship) and long-term energy bill reduction assistance through home energy upgrades.

The use of tools such as the ABATE framework when developing energy related solutions can also improve outcomes for this group. The ABATE framework identifies four states of energy hardship and provides a useful tool through which to identify groups falling through the cracks of the existing protection and assistance measures.

6. Set Targets for Ending Energy Hardship

The existing level of ambition to end energy hardship needs to be urgently raised. This can be done through setting specific targets for ending energy hardship. Publicly announced targets can also raise the profile of the issue and help galvanize public and political support, fostering a sense of urgency and commitment to address the root causes of energy hardship

Clearly defined goals create a framework that drives policy development, resource allocation, and stakeholder actions toward measurable outcomes. It also increases accountability. Suggested targets include reducing the average amount of energy debt in the ACT by an agreed upon percentage and providing home energy efficiency upgrades to all households in the lowest income quintile by 2031.

An example of a target-based approach is the EU's target of doubling the energy renovation rate by 2023.⁶⁹

7. Review the Electricity, Gas and Water Rebate (Formerly the Utilities Concession)

A thorough review of the current Electricity, Gas, and Water Rebate system is required to evaluate its effectiveness in assisting those most in need. There are reports of a growing cohort ineligible for rebates despite experiencing energy hardship. In 2023-24 only 50% customers in energy hardship programs received the utilities concession.⁷⁰ Many low-income earners do not receive assistance commensurate with their need, while some pensioners with solar PV systems receive negative energy bills due to the application of rebates.⁷¹

The review should assess the adequacy of the rebate amounts and the fairness and accessibility of the eligibility criteria. This should include feedback from stakeholders, including affected households, social service organizations, and energy providers, to ensure a broad range of perspectives are considered.

The review should consider the appropriateness of transitioning to a percentage-based energy concession in lieu of fixed amounts to ensure that the support provided scales with the actual energy costs incurred by households.

8. Improve Cross Portfolio Cooperation to Address Wider Social Factors Contributing to Energy Hardship

Energy hardship has its roots in issues that span multiple policy areas, necessitating cooperation across different portfolios.

Existing large scale support mechanisms are overly narrow in their focus and lack integration with broader social supports and policies. Their failure to consider wider social factors influencing energy hardship, such as low income, housing quality, and healthcare needs, reduces their effectiveness as a tool to address chronic energy hardship and reduce households' exposure to energy hardship in the long run.

Failure to address these issues holistically can also lead to cost-shifting between directorates. For instance, if energy policies don't address energy efficiency of housing, healthcare services may bear the cost of increased illness due to inadequate heating or cooling. Undertaking a full assessment of the costs of inaction to both the ACT economy and ACT Government would help stimulate a whole-of-government response.

9. Adequately Fund the ACT Energy Support Voucher Scheme and Explore Feasibility of Transferring Responsibility for Dispersing Vouchers to Community Organisations

The ACT energy support voucher provides households in energy hardship up to \$300 in funding annually. This is provided to households on a needs basis, upon application.

While the ACT has tripled the value of energy support vouchers, government funding for this budget line item has not increased by the same proportion.⁷² The early consequences of this mismatch are evident, with vouchers being rationed by some retailers tasked with dispersing them. This has increased the number of people in need who are being denied assistance. ACTCOSS understands the ACT Government is taking steps to increase the number of eligible customers who receive vouchers, but this work needs to be given time to progress and be evaluated.

There is also concern over the lack of transparency and predictability in the voucher issuance process by retailers. Particularly troubling is the discrepancy between retailers' judgments on who qualifies for aid and the assessments made by financial counsellors, who possess a comprehensive understanding of an individual's overall financial situation and needs.

To address these issues, ACTCOSS recommends exploring the appropriateness of transferring the responsibility for distributing Emergency Support Vouchers (ESV) to trusted community sector partners, who have a greater understanding of the needs of the cohort they serve. Additionally, it is crucial that funding for the voucher scheme be increased to match need and rise in voucher value, ensuring all who require support can receive it without undue restriction.

10. Increase Funding to Ancillary Supports

Ancillary supports such as community financial counselling services are experiencing a significant increase in demand as the cost of living rises. There has also been an increase in the number of assistance requests coming from household's ineligible for energy concessions. The lack of formal recognition and support for this group has placed a significant burden on community organisations. Without access to energy concessions, staff are often forced to seek alternative ways to help these families afford essential services. They may for example coordinate with other community organisations to source food or school supplies, allowing families to divert their limited funds towards paying energy bills. This additional effort demands considerable time and resources from already stretched community sector workers. It also increases wait times for families requiring assistance.

11. Establish a One Stop Shop with Case Management Services to Help Priority Populations Electrify and Improve Home Energy Efficiency

A one stop shop with case management services can streamline the process of home energy upgrades and electrification for priority populations by providing tailored and trusted information on home energy upgrades. This would enable each household to reduce energy bills, find suitable financial products or assistance such as grants, and receive end-to-end support and assistance in implementing upgrades like insulation, heat pumps, and solar panels. By creating a single application process and assigning case managers to guide participants, the program would reduce the complexity and associated risk of navigating electrification options. The one stop shop should focus its outreach on priority populations, offer multilingual support, culturally appropriate materials, and assistance for individuals with disabilities to ensure inclusivity.

12. Ensure People Who are Vulnerable to Energy Hardship Have a Voice Representing Their Needs at Critical Junctures of the Energy Transition

To reduce energy hardship and improve outcomes for small energy users in the ACT, it is essential their voices are represented at critical decision-making processes. Sustainably funded consumer advocacy can help achieve this.

Consumer advocates play an important role in raising the profile of issues affecting people vulnerable to energy hardship and securing better outcomes on issues such as energy market rule changes, price resets, and the roll out of new technology such as smart meters.

The need for vigilant consumer representation is growing in importance as the transition to a new energy system brings with it an increasing number of rule changes and issues requiring effective advocacy. While energy companies have sustainably funded lobbying mechanisms to put forward their views and shape outcomes of critical regulatory and policy processes which often require feedback on short notice, ACT consumers rely on ACTCOSS, which cannot consistently engage deeply with critical processes due to lack of resourcing and limited funding.

Current funding models in the ACT does not adequately support consumer advocacy efforts. Energy consumer advocates are often funded on a project-based, annual application basis, which not only sidelines advocacy as a secondary activity but also diverts resources from urgent advocacy needs to project delivery. The uncertainty of funding generated by this model also hinders organisational capacity to retain skilled staff.

To address these challenges, it is recommended that the ACT Government implement a more reliable and continuous funding model for energy consumer advocates. This model should prioritize advocacy as a core activity, independent of project-based funding, to allow advocates to respond swiftly and effectively to emerging issues and consultations. Ensuring dedicated, stable funding will enhance the capacity of consumer advocates to protect the interests of vulnerable energy consumers and contribute to more equitable energy policies.

End Notes

- ¹ Rowan Bedggood et al, *Assessing Energy Inequity and the Distributional Effects of Energy Policies* (Report, 2021) <https://storage.googleapis.com/files-au-climate/climate-au/prj309f4a1f17cf47e4c5835/page/Phase_1_Research_Report.pdf>.
- ² Independent Competition and Regulatory Commission, *ACT Retail Electricity Market Monitoring: Annual Report 2024* (Report, November 2024) 24-25 <https://www.icrc.act.gov.au/_data/assets/pdf_file/0011/2602847/ACT-retail-electricity-market-monitoring-report-2024.pdf>.
- ³ Independent Competition and Regulatory Commission, *ACT Retail Electricity Market Monitoring: Annual Report 2024* (Report, November 2024) 24-25 <https://www.icrc.act.gov.au/_data/assets/pdf_file/0011/2602847/ACT-retail-electricity-market-monitoring-report-2024.pdf>.
- ⁴ Antonio Gasparrini et al ‘Mortality Risk Attributable to High and Low Ambient Temperature: A Multicounty Observational Study’ (2015) 386 (9991) *The Lancet* 369 <[https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(14\)62114-0/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(14)62114-0/fulltext)>.
- ⁵ Better Renting, *Unsafe as Houses: A Report on Poor Housing Quality and Rental Health in Australia* (Report, 2019) <https://d3n8a8pro7vnm.cloudfront.net/betterrenting/pages/157/attachments/original/1565561048/Unsafe_as_Houses_v2.1.pdf?1565561048>.
- ⁶ Rowan Bedggood et al, *Assessing Energy Inequity and the Distributional Effects of Energy Policies* (Report, 2021) <https://storage.googleapis.com/files-au-climate/climate-au/prj309f4a1f17cf47e4c5835/page/Phase_1_Research_Report.pdf>.
- ⁷ Rowan Bedggood et al, *Assessing Energy Inequity and the Distributional Effects of Energy Policies* (Report, 2021) <https://storage.googleapis.com/files-au-climate/climate-au/prj309f4a1f17cf47e4c5835/page/Phase_1_Research_Report.pdf>.
- ⁸ Australian Bureau of Statistics, *Consumer Price Index*, (Web Page, 2020) <<https://www.abs.gov.au/statistics/economy/price-indexes-and-inflation/consumer-price-index-australia/latest-release#main-features>>, in Rowan Bedggood et al, *Assessing Energy Inequity and the Distributional Effects of Energy Policies* (Report, 2021) 7 <https://storage.googleapis.com/files-au-climate/climate-au/prj309f4a1f17cf47e4c5835/page/Phase_1_Research_Report.pdf>.
- ⁹ Australian Energy Regulator, *State of the Energy Market 2023* (Report, 2023) 202 <https://www.aer.gov.au/system/files/2023-10/State%20of%20the%20energy%20market%202023%20-%20Full%20report_1.pdf>.
- ¹⁰ Energy Consumers Australia, *Energy Consumer Sentiment Survey: Topline Results* (Report, June 2024) <<https://energyconsumersaustralia.com.au/wp-content/uploads/ecss-jun24-topline-results-report.pdf>>.
- ¹¹ Australian Energy Regulator, *State of the Energy Market 2023* (Report, 2023) 202 <https://www.aer.gov.au/system/files/2023-10/State%20of%20the%20energy%20market%202023%20-%20Full%20report_1.pdf>.
- ¹² Australian Competition and Consumer Commission, *Inquiry into the National Electricity Market*, (Report, 3 June 2024) 1 <<https://www.accc.gov.au/system/files/accc-inquiry-national-electricity-market-report-june-2024.pdf>>.
- ¹³ St Vincent de Paul Society, *ACT Energy Prices 2024*, (Report, July 2024) 6 <<https://cms.vinnies.org.au/media/tciczjrf/act-2024-july-energy-prices-report.pdf?path=tciczjrf%2Fact-2024-july-energy-prices-report.pdf>>.
- ¹⁴ St Vincent de Paul Society, *ACT Energy Prices 2024*, (Report, July 2024) 6 <<https://cms.vinnies.org.au/media/tciczjrf/act-2024-july-energy-prices-report.pdf?path=tciczjrf%2Fact-2024-july-energy-prices-report.pdf>>.
- ¹⁵ St Vincent de Paul Society, *ACT Energy Prices 2024*, (Report, July 2024) 6 <<https://cms.vinnies.org.au/media/tciczjrf/act-2024-july-energy-prices-report.pdf?path=tciczjrf%2Fact-2024-july-energy-prices-report.pdf>>.
- ¹⁶ St Vincent de Paul Society, *Workbook 3 Electricity Market Offers*, (Workbook, 2023) <<https://www.vinnies.org.au/media/3kolaxlw/act-wb3-electricity-market-offers-july-2023-locked.xlsx>>.
- ¹⁷ ‘Comfort and Energy Efficiency on the Rise in New Australian Homes’, *Commonwealth Scientific and Industrial Research Organization* (Web Page, August 2024) <<https://www.csiro.au/en/news/all/news/2024/august/comfort-and-energy-efficiency-on-the-rise-in-new-australian-homes>>.
- ¹⁸ ‘Winter Energy Savings’, *Department of Climate Change, Energy, Environment and Water* (Web Page, 2024) <<https://www.energy.gov.au/households/household-guides/seasonal-advice/winter>>.
- ¹⁹ Australian Housing and Urban Research Institute, *A National Roadmap for Improving the Building Quality of Australian Housing Stock* (Final Report No 426, August 2024) <<https://www.ahuri.edu.au/sites/default/files/documents/2024-08/AHURI-Final-Report-426-A-national-roadmap-for-improving-the-building-quality-of-Australian-housing-stock.pdf>>.
- ²⁰ Australian Housing and Urban Research Institute, *A National Roadmap for Improving the Building Quality of Australian Housing Stock* (Final Report No 426, August 2024) <<https://www.ahuri.edu.au/sites/default/files/documents/2024-08/AHURI-Final-Report-426-A-national-roadmap-for-improving-the-building-quality-of-Australian-housing-stock.pdf>>.
- ²¹ Cynthia Faye Barlow et al, ‘Cold Homes in Australia: Questioning our Assumptions about Prevalence’ (2023) 55 *Energy Research & Social Science* <<https://www.sciencedirect.com/science/article/pii/S2214629623001846>>.
- ²² Trivess Moore et al, ‘Aiming for Mediocrity: The case of Australian Housing Thermal Performance’ (2019) 132 *Energy Policy* <<https://www.sciencedirect.com/science/article/abs/pii/S0301421519303878?via%3Dihub>>.

- ²³ Trivess Moore et al, 'Aiming for Mediocrity: The case of Australian Housing Thermal Performance' (2019) 132 *Energy Policy* <<https://www.sciencedirect.com/science/article/abs/pii/S0301421519303878?via%3Dihub>>.
- ²⁴ 'Energy Rating National Overview', *Commonwealth Scientific and Industrial Research Organisation*, (Web Page, 2024) <<https://ahd.csiro.au/dashboards/energy-rating/energy-rating-national-overview/>>.
- ²⁵ Energy Consumers Australia, *Submission to the ACT Government: Minimum Energy Efficiency Standards for Rental Properties* (Submission, 2024), <<https://energyconsumersaustralia.com.au/wp-content/uploads/submission-doc-act-gov-minimum-energy-efficiency-standards-rental-properties.pdf>>.
- ²⁶ 'Winter Energy Savings', *Department of Climate Change, Energy, Environment and Water* (Web Page, 2024) <<https://www.energy.gov.au/households/household-guides/seasonal-advice/winter>>.
- ²⁷ 'Draught Proofing a Home', *Sustainability Victoria* (Web Page, 2024) <[https://www.sustainability.vic.gov.au/energy-efficiency-and-reducing-emissions/building-or-renovating/key-principles-of-energy-efficient-design/planning-and-design/insulation/draught-proofing#:~:text=Draught%20proofing%20stops%20warm%20air,\(also%20known%20as%20draughts\)>](https://www.sustainability.vic.gov.au/energy-efficiency-and-reducing-emissions/building-or-renovating/key-principles-of-energy-efficient-design/planning-and-design/insulation/draught-proofing#:~:text=Draught%20proofing%20stops%20warm%20air,(also%20known%20as%20draughts)>)>.
- ²⁸ 'Winter Energy Savings', *Department of Climate Change, Energy, Environment and Water* (Web Page, 2024) <<https://www.energy.gov.au/households/household-guides/seasonal-advice/winter>>.
- ²⁹ Australian Housing and Urban Research Institute, *A National Roadmap for Improving the Building Quality of Australian Housing Stock* (Final Report No 426, August 2024) <<https://www.ahuri.edu.au/sites/default/files/documents/2024-08/AHURI-Final-Report-426-A-national-roadmap-for-improving-the-building-quality-of-Australian-housing-stock.pdf>>.
- ³⁰ Energy Consumers Australia, *Submission to the ACT Government: Minimum Energy Efficiency Standards for Rental Properties* (Submission, 2024), <<https://energyconsumersaustralia.com.au/wp-content/uploads/submission-doc-act-gov-minimum-energy-efficiency-standards-rental-properties.pdf>>.
- ³¹ 'How to Keep Warm This Australian Winter', *Choice* (Web Page, 15 September 2017) <https://www.choice.com.au/home-and-living/heating/home-heating/articles/how-to-keep-warm-this-australian-winter-170915>.
- ³² Better Renting, *Unsafe as Houses: A Report on Poor Housing Quality and Rental Health in Australia* (Report, 2019) <https://d3n8a8pro7vhmx.cloudfront.net/betterrenting/pages/157/attachments/original/1565561048/Unsafe_as_Houses_v2.1.pdf?1565561048>.
- ³³ Better Renting, *Unsafe as Houses: A Report on Poor Housing Quality and Rental Health in Australia* (Report, 2019) <https://d3n8a8pro7vhmx.cloudfront.net/betterrenting/pages/157/attachments/original/1565561048/Unsafe_as_Houses_v2.1.pdf?1565561048>.
- ³⁴ Mark Rigby, 'Australians Could Save Up to \$1,900 a Year on Energy Bills, Climate Council Finds' *ABC News* (Web Page, 2023) <<https://www.abc.net.au/news/science/2023-04-19/climate-council-household-savings-energy-bills-costs-winter/102233588>>.
- ³⁵ Better Renting, *Unsafe as Houses: A Report on Poor Housing Quality and Rental Health in Australia* (Report, 2019) <https://d3n8a8pro7vhmx.cloudfront.net/betterrenting/pages/157/attachments/original/1565561048/Unsafe_as_Houses_v2.1.pdf?1565561048>.
- ³⁶ Environment, Planning and Sustainable Development Directorate (ACT), *Minimum Energy Efficiency Standards for Rental Properties* (Report, September 2024) <https://www.climatechoices.act.gov.au/_data/assets/pdf_file/0007/2562874/act-min-rental-standards.pdf>.
- ³⁷ Australian Competition and Consumer Commission, *Inquiry into the National Electricity Market* (Report, 3 June 2024) <<https://www.accc.gov.au/system/files/accc-inquiry-national-electricity-market-report-june-2024.pdf>>.
- ³⁸ Rowan Bedggood et al, *Assessing Energy Inequity and the Distributional Effects of Energy Policies* (Report, 2021) 5, 48 <https://storage.googleapis.com/files-au-climate/climate-au/p/prj309f4a1f17cf47e4c5835/page/Phase_1_Research_Report.pdf>.
- ³⁹ Energy Consumers Australia, *Energy Consumer Sentiment Survey: June 2024 Topline Data* (Data File, June 2024) <<https://energyconsumersaustralia.com.au/wp-content/uploads/ecss-jun-24-topline-data.xlsx>>.
- ⁴⁰ Energy Consumers Australia, *Energy Consumer Sentiment Survey: June 2024 Topline Data* (Data File, June 2024) <<https://energyconsumersaustralia.com.au/wp-content/uploads/ecss-jun-24-topline-data.xlsx>>.
- ⁴¹ Rowan Bedggood et al, *Assessing Energy Inequity and the Distributional Effects of Energy Policies* (Report, 2021) 48 <https://storage.googleapis.com/files-au-climate/climate-au/p/prj309f4a1f17cf47e4c5835/page/Phase_1_Research_Report.pdf>.
- ⁴² Rowan Bedggood et al, *Assessing Energy Inequity and the Distributional Effects of Energy Policies* (Report, 2021) 53, 56 <https://storage.googleapis.com/files-au-climate/climate-au/p/prj309f4a1f17cf47e4c5835/page/Phase_1_Research_Report.pdf>.
- ⁴³ Rowan Bedggood et al, *Assessing Energy Inequity and the Distributional Effects of Energy Policies* (Report, 2021) 53, 56 <https://storage.googleapis.com/files-au-climate/climate-au/p/prj309f4a1f17cf47e4c5835/page/Phase_1_Research_Report.pdf>.
- ⁴⁴ Rowan Bedggood et al, *Assessing Energy Inequity and the Distributional Effects of Energy Policies* (Report, 2021) 53, 56 <https://storage.googleapis.com/files-au-climate/climate-au/p/prj309f4a1f17cf47e4c5835/page/Phase_1_Research_Report.pdf>.
- ⁴⁵ Energy Consumers Australia, *Understanding the Energy Divide* (Report, 2024) <<https://energyconsumersaustralia.com.au/wp-content/uploads/Understanding-the-energy-divide-1.pdf>>.
- ⁴⁶ Environment, Planning and Sustainable Development Directorate (ACT), *Energy Equity in Electrifying ACT Households* (Report, 2024) <https://www.climatechoices.act.gov.au/_data/assets/pdf_file/0005/2509241/energy-equity-in-electrifying-act-households.pdf>.
- ⁴⁷ Environment, Planning and Sustainable Development Directorate (ACT), *Energy Equity in Electrifying ACT Households* (Report, 2024) 11 <https://www.climatechoices.act.gov.au/_data/assets/pdf_file/0005/2509241/energy-equity-in-electrifying-act-households.pdf>.

- ⁴⁸ Environment, Planning and Sustainable Development Directorate (ACT), *Energy Equity in Electrifying ACT Households* (Report, 2024) 11 <https://www.climatechoices.act.gov.au/_data/assets/pdf_file/0005/2509241/energy-equity-in-electrifying-act-households.pdf>.
- ⁴⁹ ACIL Allen, *Minimum Standards for Residential Rental Properties: Decision Regulation Impact Statement* (Report, 2021), 9 <https://acilallen.com.au/uploads/projects/416/ACILAllen_MinimumStandardsRIS_2021_2.pdf>.
- ⁵⁰ Energy Consumers Australia, *Understanding the Energy Divide* (Report, 2024) <<https://energyconsumersaustralia.com.au/wp-content/uploads/Understanding-the-energy-divide-1.pdf>>.
- ⁵¹ Rowan Bedggood et al, *Assessing Energy Inequity and the Distributional Effects of Energy Policies* (Report, 2021) <https://storage.googleapis.com/files-au-climate/climate-au/p/prj309f4a1f17cf47e4c5835/page/Phase_1_Research_Report.pdf>.
- ⁵² Justice Equity Centre, *Overhaul of Energy Concessions Needed as Three Million Households Struggle to Pay Their Energy Bills* (Submission, 2022) <<https://jec.org.au/energy-and-water/overhaul-of-energy-concessions-needed-as-three-million-households-struggle-to-pay-their-energy-bills/>>.
- ⁵³ Rowan Bedggood et al, *Assessing Energy Inequity and the Distributional Effects of Energy Policies* (Report, 2021) 53 <https://storage.googleapis.com/files-au-climate/climate-au/p/prj309f4a1f17cf47e4c5835/page/Phase_1_Research_Report.pdf>.
- ⁵⁴ Rowan Bedggood et al, *Assessing Energy Inequity and the Distributional Effects of Energy Policies* (Report, 2021) 53 <https://storage.googleapis.com/files-au-climate/climate-au/p/prj309f4a1f17cf47e4c5835/page/Phase_1_Research_Report.pdf>.
- ⁵⁵ Rowan Bedggood et al, *Assessing Energy Inequity and the Distributional Effects of Energy Policies* (Final Report, GEER Australia, Swinburne University of Technology, 2021), Pg 53, https://storage.googleapis.com/files-au-climate/climate-au/p/prj309f4a1f17cf47e4c5835/page/Phase_1_Research_Report.pdf.
- ⁵⁶ Environment, Planning and Sustainable Development Directorate (ACT), *Energy Equity in Electrifying ACT Households* (Report, 2024) 4 <https://www.climatechoices.act.gov.au/_data/assets/pdf_file/0005/2509241/energy-equity-in-electrifying-act-households.pdf>.
- ⁵⁷ Environment, Planning and Sustainable Development Directorate (ACT), *Energy Equity in Electrifying ACT Households* (Report, 2024) <https://www.climatechoices.act.gov.au/_data/assets/pdf_file/0005/2509241/energy-equity-in-electrifying-act-households.pdf>.
- ⁵⁸ Environment, Planning and Sustainable Development Directorate (ACT), *Energy Equity in Electrifying ACT Households* (Report, 2024) <https://www.climatechoices.act.gov.au/_data/assets/pdf_file/0005/2509241/energy-equity-in-electrifying-act-households.pdf>.
- ⁵⁹ ACIL Allen, *Minimum Standards for Residential Rental Properties: Decision Regulation Impact Statement* (Report, 2021) <https://acilallen.com.au/uploads/projects/416/ACILAllen_MinimumStandardsRIS_2021_2.pdf>.
- ⁶⁰ Healthy Homes for Renters, *Tasmanian Community Sector, Community Sector Blueprint: Mandatory Minimum Rental Standards*, (Report, July 2023) <<https://static1.squarespace.com/static/602f0d14c4c0a77efc25e152/t/64b095418e792e5f538088fb/1689294161675/Final+Community+Sector+Blueprint+-+Mandatory+Minimum+Rental+Standards+++%28July+2023%29.pdf>>.
- ⁶¹ Australian Council of Social Service, *The Economic and Social Benefits of Energy Upgrades for Low-Income Households* (Report, July 2024) <<https://www.acoss.org.au/wp-content/uploads/2024/07/ACOSS-Deloitte-low-income-energy-upgrades-Final-July-2024.pdf>>.
- ⁶² Environment, Planning and Sustainable Development Directorate (ACT), *Energy Equity in Electrifying ACT Households* (Report, 2024) <https://www.climatechoices.act.gov.au/_data/assets/pdf_file/0005/2509241/energy-equity-in-electrifying-act-households.pdf>.
- ⁶³ Australian Council of Social Service, *The Economic and Social Benefits of Energy Upgrades for Low-Income Households* (Report, July 2024) 13 <<https://www.acoss.org.au/wp-content/uploads/2024/07/ACOSS-Deloitte-low-income-energy-upgrades-Final-July-2024.pdf>>.
- ⁶⁷ Australian Council of Social Service, *The Economic and Social Benefits of Energy Upgrades for Low-Income Households* (Report, July 2024) 13 <<https://www.acoss.org.au/wp-content/uploads/2024/07/ACOSS-Deloitte-low-income-energy-upgrades-Final-July-2024.pdf>>.
- ⁶⁵ Australian Council of Social Service, *The Economic and Social Benefits of Energy Upgrades for Low-Income Households* (Report, July 2024) 16 <<https://www.acoss.org.au/wp-content/uploads/2024/07/ACOSS-Deloitte-low-income-energy-upgrades-Final-July-2024.pdf>>.
- ⁶⁶ Australian Council of Social Service, *The Economic and Social Benefits of Energy Upgrades for Low-Income Households* (Report, July 2024) <<https://www.acoss.org.au/wp-content/uploads/2024/07/ACOSS-Deloitte-low-income-energy-upgrades-Final-July-2024.pdf>>.
- ⁶⁷ Australian Council of Social Service, *The Economic and Social Benefits of Energy Upgrades for Low-Income Households* (Report, July 2024) <<https://www.acoss.org.au/wp-content/uploads/2024/07/ACOSS-Deloitte-low-income-energy-upgrades-Final-July-2024.pdf>>.
- ⁶⁸ Australian Council of Social Service, *The Economic and Social Benefits of Energy Upgrades for Low-Income Households* (Report, July 2024) <<https://www.acoss.org.au/wp-content/uploads/2024/07/ACOSS-Deloitte-low-income-energy-upgrades-Final-July-2024.pdf>>.
- ⁶⁹ European Commission, *Stepping up Europe's 2030 Climate Ambition: Investing in a Climate-Neutral Future for the Benefit of Our People* (Communication No 52020DC0662, 17 September 2020) <<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1603122220757&uri=CELEX:52020DC0662>>.
- ⁷⁰ Independent Competition and Regulatory Commission, *ACT Retail Electricity Market Monitoring: Annual Report 2024* (Report, November 2024) <https://www.icrc.act.gov.au/_data/assets/pdf_file/0011/2602847/ACT-retail-electricity-market-monitoring-report-2024.pdf>.
- ⁷¹ Environment, Planning and Sustainable Development Directorate (ACT), *Energy Equity in Electrifying ACT Households* (Report, 2024) 37, 38 <https://www.climatechoices.act.gov.au/_data/assets/pdf_file/0005/2509241/energy-equity-in-electrifying-act-households.pdf>.
- ⁷² Legislative Assembly for the Australian Capital Territory (Senate Select Committee on Estimates 2024-2025), *Answer to Question Taken on Notice During Public Hearings* (Question No. 40, 28 July 2024) <https://www.parliament.act.gov.au/_data/assets/pdf_file/0010/2539009/QTON-040-Answer-EPSDD-Utility-hardship-fund-eligibility-and-criteria-LEE.pdf>.