

**Submission
No 40**

INQUIRY INTO ELECTRICITY SUPPLY, DEMAND AND PRICES IN NEW SOUTH WALES

Organisation: St Vincent de Paul Society (NSW)

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Select Committee on Electricity Supply,
Demand and Prices in New South Wales
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Dear Committee members,

Re: Inquiry into electricity supply, demand and prices in New South Wales

The St Vincent de Paul Society NSW ('the Society') welcomes the opportunity to provide a submission to the Committee on Electricity Supply, Demand and Prices in New South Wales.

As a provider of energy assistance, the Society is well-aware of the impacts of the rising costs of electricity. Since 2007-08, average residential bills in NSW have increased by 45% and the recent July 2017 rise was another shock for low-income households. Even the cheapest offers available on the market – between \$1,875 and \$2,174 a year depending on the area – are unaffordable for many of the people who come to us because they want to keep the lights on but cannot pay their bills anymore.

High electricity bills affect the poorest the hardest. On average, low-income households spend 4.8 per cent of their income on electricity, compared to 0.8 percent for high earners. The NSW Energy and Water Ombudsman reports increases in levels of electricity-related debt, enrolment in payment plans, and disconnection for non-payment.

Electricity, like shelter, water, gas and telecoms is an essential service. Ultimately, we believe it is the responsibility of Government to ensure that everyone in the community has access to affordable, reliable and clean energy.

Our submission makes eight key recommendations, including the creation of a **Basic Service Offer** for people who expect a simple, 'no-frills' service at a reasonable price, and a **17.5% concession**, which would be fairer than the fixed-amount Low Income Household Rebate.

I look forward to working with you to make sure that everyone in NSW gets to keep the lights on.

Yours sincerely,

Jack de Groot
CEO
St Vincent de Paul Society NSW

Who we are

The St Vincent de Paul Society NSW (‘the Society’) has been assisting marginalised and disadvantaged people in New South Wales for more than 130 years. People are assisted by the Society either by Conference members – i.e. parish groups established in local areas to provide assistance to people experiencing disadvantage – or through specialised professional services tailored to meet the various needs of the people who come to us.¹

Our services include specialist homeless services; assistance to migrants and refugees; home, hospital, prison and detention centre visitation; shops and assistance centres; mental health programs; disability services; drug, alcohol and gambling counselling services; financial counselling; food vans; and rural taskforce assistance.

Executive summary

Since 2007-08, average residential bills in NSW have increased by around 45%², primarily driven by higher network costs and, to a lesser extent, retail margins. For low-income households, even the cheapest offers on the market – between \$1,875 and \$2,174 a year depending on the area – are too expensive.

Electricity, like shelter, water, gas and telecoms is an essential service. While market mechanisms have a role to play, ultimately we believe it is the responsibility of Government to ensure that everyone in the community has access to affordable, reliable and clean energy.

The Society therefore recommends:

1. **Creating a Basic Service Offer** so that people who only want a ‘no-frills’ deal are able to enjoy a simple service at a guaranteed price.
2. **Abolishing Standing Offers**, which are significantly more expensive than market offers and would be replaced with the Basic Service Offer as a default option.
3. **Forbidding price increases during a contract period**. Retailers should no longer be allowed to vary the prices that they charge at any point *in the contract*.
4. **Requiring retailers to provide clearer, standardised information about market offers** so that consumers understand the services they are getting at different price points.
5. **Creating a brokerage service** to assist concession card holders in making decisions.
6. **Replacing the Low Income Household Rebate** with a more equitable and adequate **17.5% concession**.
7. **Strengthening hardship program requirements** to make sure that those who struggle to pay their bills are moved on to the lowest market offers.
8. **Clarifying EAPA guidelines** to improve access to this important crisis support scheme.

¹ St Vincent de Paul Society NSW, *Annual Report 2015-2016* Available at: https://www.vinnies.org.au/icms_docs/257079_Annual_Report_2015_-16.pdf

² ACCC, September 2017, *Retail Electricity Pricing Inquiry Preliminary Report* Available at: <https://www.accc.gov.au/system/files/ACCC%20Retail%20Electricity%20Pricing%20Inquiry%20-%20Preliminary%20Report%20-%2022%20September%202017.pdf>

Comments on the Terms of Reference

(a) the reasons for recent large increases in the price of electricity

NSW residential customers have experienced significant price increases over the past decade. In 2015/16, retail residential bills were made of the following components³:

- network (49%);
- wholesale (22%);
- retail and other costs (15%);
- retail margin (8%);
- Environmental schemes (6%).

The July 2017 increase is mainly due to wholesale price rises

Electricity prices increased significantly in 2017 largely due to increasing wholesale costs. IPART estimate that electricity retail prices increased by an average of 14% for residential customers at the start of 2017-18.⁴ Research commissioned by the Society⁵ also found that:

- The average market offer for households consuming 7,200 kWh per annum increased by 16% to 19% (depending on network area) in July 2017.
- The average electricity market offer in NSW produces an annual bill of \$2,570 in the Essential Energy network, \$2,295 in Ausgrid and \$2,230 in Endeavour.
- Even the cheapest offer available on the market is unaffordable for many people in the community. The *best* market offers for households with typical consumption levels range between \$1,875 and \$2,174 depending on the area.

While increasing wholesale prices should signal a need for new generation capacity, continuing uncertainty about Australia's energy policy is hindering investment.

Since 2007-08, network costs have surged and retail margins increased

Successive price increases over the past decade point to concerning systemic failures. Since 2007-08, average residential bills in NSW have increased by around 45%⁶, primarily driven by higher network costs. Electricity price increases during this period were also driven by increasing retailer operating costs and retailer margins, as well as by increasing environmental scheme costs.

According to the ACCC, the breakdown of changes in average NSW residential bill components per customer from 2007–08 to 2015–16⁷ is as follows:

- **network (+66%);**
- wholesale (-34%);
- retail and other costs (+7%);
- **retail margin (+46%);**
- Environmental schemes (+16%).

³ ACCC, September 2017, Retail Electricity Pricing Inquiry Preliminary Report Available at: <https://www.accc.gov.au/system/files/ACCC%20Retail%20Electricity%20Pricing%20Inquiry%20-%20Preliminary%20Report%20-%2022%20September%202017.pdf>

⁴ IPART, October 2017, Review of the performance and competitiveness of the retail electricity market in NSW from 1 July 2016 to 30 June 2017 Available at: <https://www.ipart.nsw.gov.au/files/sharedassets/website/shared-files/investigation-compliance-monitoring-electricity-publications-market-monitoring-201617/draft-report-performance-and-competitiveness-of-the-retail-electricity-market-in-nsw-october-2017.pdf>

⁵ St Vincent de Paul Society, 2017 NSW Energy Prices July 2017 An update report on the NSW Tariff-Tracking Project Available at: https://www.vinnies.org.au/icms_docs/272193_NSW_Energy_Prices_July_2017.pdf

⁶ Ibid 3

⁷ Ibid 3

(b) the impact of the deregulation of electricity prices in 2014

Impacts on consumers

Retail price deregulation has greatly affected energy consumers who are now required to be highly engaged in the electricity market. Retailers typically have several different market offers available, which vary greatly.⁸ Research commissioned by the Society found that the difference between electricity market offers is significant and increasing. The difference between the single best and the single worst market offer currently ranges from \$1,230 per annum (in Essential's area) to \$840 (in Ausgrid's area) for customers with typical consumption levels.⁹

Consumers are required to *remain* engaged to avoid being penalised. The standard practice of retailers is to default customers onto expensive standing offers, which have increased by 10% since price deregulation, once their market offer contracts end. In 2016-17, 23% of residential customers in NSW were on a standing offer. These customers are paying around 25% more than those on lowest offers in the market.

High electricity bills affect the poorest the hardest. On average, low-income households spend 4.8 per cent of their income on electricity, compared to 0.8 per cent for high earners. The NSW Energy and Water Ombudsman reports increases in average levels of electricity related debt, enrolment in payment plans, and disconnection for non-payment.

Impacts on retailers

Price deregulation allows retailers to set prices, and potentially higher margins as discussed in the next section (c).

Deregulation and competition in NSW and other states¹⁰ have also led to additional costs, which are ultimately passed onto energy users. In a competitive environment, retailers have needed to invest more in marketing to acquire and retain customers. Research by the Australia Institute found that “adding up the additional labour costs of the new functions under privatisation, corporatisation and marketization and adding the costs of allowing returns on fictitious capital and retained profits [...] the additional charges are likely to be of the order of \$404 to \$502 per household per annum” in the NEM.¹¹

(c) alleged collusion and price gouging by energy retailers,

The Society is not aware of instances of collusion or price gouging by energy retailers. However, the concentration of the electricity market raises concerns that the market might be structurally incapable of delivering the best outcomes for energy users, particularly low-income households.

Concentration of the electricity market in NSW

While the energy supply industry was structurally separated in the 1990's, many retailers later reintegrated with generators to form integrated groups that own portfolios in both generation and

⁸ IPART, October 2017, *Review of the performance and competitiveness of the retail electricity market in NSW from 1 July 2016 to 30 June 2017*. Available at: <https://www.ipart.nsw.gov.au/files/sharedassets/website/shared-files/investigation-compliance-monitoring-electricity-publications-market-monitoring-201617/draft-report-performance-and-competitiveness-of-the-retail-electricity-market-in-nsw-october-2017.pdf>

⁹ St Vincent de Paul Society, 2017 *NSW Energy Prices July 2017 - An update report on the NSW Tariff-Tracking Project* Available at https://www.vinnies.org.au/icms_docs/272193_NSW_Energy_Prices_July_2017.pdf

¹⁰ *Independent Review into the Electricity & Gas retail Markets in Victoria*, August 2017 Available at https://engage.vic.gov.au/application/files/7415/0267/4425/Retail_Energy_Review_-_Final_Report.pdf

¹¹ David Richardson, The Australia Institute, June 2017 *Electricity costs - Preliminary results showing how privatisation went seriously wrong*. Available at http://www.tai.org.au/sites/default/files/P415%20Electricity%20costs_0.pdf

retail. The NSW electricity sector is dominated by the big three retailers who acquired their generation and retail assets through privatisation processes that began in 2011.

Origin Energy, EnergyAustralia and AGL Energy supply 90 per cent of retail customers and control 69 per cent of generation capacity. They also supply 96 per cent of gas retail customers.¹²

The AER notes that “high levels of market concentration and vertical integration between generators and retailers lead to market structures that may provide opportunities for the exercise of market power” and is currently developing frameworks to implement its new competition monitoring role as per enabling legislation adopted in December 2016.¹³

Retail margins

The Society wishes to echo a long-standing concern among consumer advocates, including the Public Interest Advocacy Centre¹⁴, that the retail margins in the NSW electricity market are considerably higher than is efficient to recover costs.

The ACCC found that retail margins had increased significantly in NSW since FY2008 compared with other states. Research on the NEM conducted by the Grattan Institute concluded that “competition in electricity retailing hasn’t delivered what was promised: lower prices for consumers. The failure is worst in Victoria, the state with the most retailers and the longest experience of deregulation. Profit margins appear to be higher than in other sectors – and more than double the margin that regulators considered fair when they set retail electricity prices.”¹⁵

Electricity is a profitable business for the top three “gentailers”:

- **AGL** reported¹⁶ that “FY17 was a strong year for AGL” and the company “delivered a record profit and returned approximately \$1.1 billion to shareholders.” The company’s annual report also indicates that “underlying Profit after tax for the year ended 30 June 2017 was \$802 million, up 14.4% compared with \$701 million in the prior year. The principal drivers of the increase were: higher wholesale electricity prices, disciplined customer price management and cost reduction initiatives. Offsetting this were higher commodity costs, a decline in consumer electricity volumes and lower gas margin.”
- **Origin** also reported¹⁷ a “solid” operational performance for the year with underlying profit up \$185 million or 51% and an increase in underlying EBITDA of \$834 million, or 49 per cent, to \$2.5 billion in FY2017. The company reports that “in Energy Markets, our electricity business is performing well”.
- **EnergyAustralia** is now owned by the Hong-Kong-based CLP Group. CLP recently reported that “EnergyAustralia performed well in 2016”¹⁸. However, “in the first half of the [2017] year, EnergyAustralia’s operating earnings decreased 15.5% to HK\$758 million,

¹² AER, May 2017, *State of the Energy Market May 2017* Available at:

<https://www.aer.gov.au/system/files/AER%20State%20oP%20the%20energy%20market%202017%20-%20A4.pdf>

¹³ Ibid 12

¹⁴ PIAC, October 2016 *A competitive market to benefit all. IPART Review of the performance and competitiveness of the retail electricity market in NSW*

Available at: https://www.piac.asn.au/wp-content/uploads/2016/11/16.10.27_piac_submission_to_iparts_review_of_the_performance_and_competitiveness_of_the_retail_electricity_market_in_nsw.pdf

¹⁵ Tony Wood and David Blowers, Grattan Institute, 2017 *Price Shock: is the retail electricity market failing consumers?* Report No 2017-04

¹⁶ AGL, 25 August 2017 *Annual Report 2017* Available at: <https://grattan.edu.au/wp-content/uploads/2017/03/Price-shock-is-the-retail-market-failing-consumers.pdf>

¹⁷ Origin Energy, *Annual Report FY2017* Available at: https://www.originenergy.com.au/content/dam/origin/about/investors-media/annual%20review%202017/AnnualReport_FY2017.pdf

¹⁸ CLP, *Annual Report 2016* Available at: https://www.originenergy.com.au/content/dam/origin/about/investors-media/annual%20review%202017/AnnualReport_FY2017.pdf

largely due to the impact of significant volatility in the market on the value of energy contracts.”¹⁹

(d) the effectiveness or impact of any current regulatory standards and guidelines,

Regulatory standards and guidelines have failed to protect the most vulnerable consumers.

Price setting for market offers

As noted previously (b), price deregulation allows retailers to set prices and has led to significant price variations between different offers. Retailers are also allowed to change the prices that they charge unilaterally at any point in the contract and are not required to notify customers of price changes until their next available bill²⁰, which renders customer choice redundant.

Standing offers

As noted previously (b), the standard practice of retailers is to default customers onto expensive standing offers is highly problematic and unfairly penalises customers who are unaware of this practice. In 2016-17, 23% of residential customers in NSW were on a standing offer. These customers are paying around 25% more than those on lowest offers in the market.

Information

The current regulatory framework does not provide consumers with standardised easy-to-compare information about various market offers. There is a considerable asymmetry of information between energy retailers and energy customers.

Hardship programs

IPART “found that most retailers have *strategies* for helping hardship customers to access lower prices. These strategies involve either switching customers who are in their hardship program to contracts with lower prices, or advising these customers that they would save money on their electricity bill if they changed plan.”

However, the National Energy Customer framework only imposes minimal *obligations* on energy retailers to support customers who are experiencing financial difficulties and are unable to pay their energy bills. Retailers are only required to offer a payment plan to make the bill payments more manageable.

(e) options for future government oversight and responsibility in the re-regulation of electricity prices,

It is fundamental to recognise that electricity is an essential service, which places users in a structural position of vulnerability— while consumers can shop around for available deals offered by retailers, one can hardly choose to opt out of the market completely.

We are concerned about the additional costs associated with privatisation and deregulation (b), and with the excessive burden placed on consumers. Importantly, we believe that people who want a basic service are being left out.

¹⁹ CLP, *2017 Interim Report* Available at: https://www.clpgroup.com/en/Investors-Information-site/Documents/Financial%20Report%20PDF/E_2017%20Interim%20Report.pdf

²⁰ IPART, October 2017, *Review of the performance and competitiveness of the retail electricity market in NSW from 1 July 2016 to 30 June 2017*. Available at: <https://www.ipart.nsw.gov.au/files/sharedassets/website/shared-files/investigation-compliance-monitoring-electricity-publications-market-monitoring-201617/draft-report-performance-and-competitiveness-of-the-retail-electricity-market-in-nsw-october-2017.pdf>

In the context described previously, the Society recommends:

- **Creating a Basic Service Offer.** While better information to consumers can go some way in making sure that more consumers access the lowest priced market offers, consumer power is bound to remain fairly limited as one can hardly opt out of the market for this essential service. We therefore recommend the introduction of a requirement for retailers to provide a Basic Service Offer with a clear and transparent regulated annual price.

A Basic Service Offer would have to be provided by retailers as an option amongst other offers. It would not preclude retailers from providing offers to consumers with additional services and lower or higher prices. However, consumers who are only interested in a basic 'no-frills' service would be guaranteed access to an offer at a price set by the regulator. The regulator could set price levels for each consumption level. The Victorian independent retail energy review provides an example of a basic service offer price curve.²¹

- **Abolishing Standing Offers.** As noted above (d), consumers on standing offers pay significantly more than consumers on market offers. The Basic Service Offer would replace standing offers as a default offer.
- **Forbidding unilateral price increases.** Retailers should no longer be allowed to vary the prices that they charge at any point in the contract as it renders consumer choice effectively redundant.
- **Requiring retailers to provide clearer, standardised information about market offers.** Market offers should be expressed in dollar terms rather than percentages and discounts and, where the customer's consumption is known, be expressed based on the estimated annual costs of the offer for that customer. The regulator should develop standardised customer usage profiles and retailers should clearly show the actual annual costs for standardised customer usage profiles on promotional material.

We understand that the AEMC is currently considering a proposal to change the National Energy Retail rules to require retailers to provide more information to customers, particularly when their fixed benefits period ends.

(f) the adequacy of planning to meet future electricity demand, including utilising high efficiency, low emissions coal technology as well as the use of nuclear, gas, solar and wind energies, and energy storage through batteries, pumped hydro and hydrogen, and improved transmission between regions,

The Society acknowledges the significant transformation that the energy system is undergoing. Providing access to affordable, reliable and clean energy will require significant reforms at the national and state levels. We wish to draw the attention of the Committee to the *Empowering disadvantaged households to access affordable, clean energy* report produced by ACOSS, the Brotherhood of St Laurence and the Climate Institute on this matter.²²

We note with great concern that the absence of an Australian Energy policy is having detrimental effects on investments and slowing the necessary transition towards a clean energy future.

²¹ *Independent Review into the Electricity & Gas retail Markets in Victoria*, August 2017 Available at:

https://engage.vic.gov.au/application/files/7415/0267/4425/Retail_Energy_Review_-_Final_Report.pdf

²² ACOSS, Brotherhood of St Laurence, The Climate Institute *Empowering disadvantaged households to access affordable, clean energy* Available at: http://www.acoss.org.au/wp-content/uploads/2017/07/ACOSS_BSL_TCI_Empowering-households.pdf

(g) the adequacy of programs to assist low income earners, pensioners and senior card holders to afford electricity as well as the impact of additional fees, such as late payment fees, included in energy bills,

As a provider of energy support, the Society witnesses the impacts of high electricity bills on vulnerable households on a daily basis.

A survey by NCOSS found that 9% of vulnerable household respondents regularly and 22% sometimes go without a substantial daily meal in order to pay energy bills.²³ Households who are most vulnerable to energy stress include people who are out of paid work and living on low, fixed incomes; people living in poor quality housing, particularly renters; people with a disability and carers; and single parents.

In this context, it is vital to improve our concession system so that those who are most vulnerable pay less.

Low-Income Household Rebate

The NSW Auditor General found that ongoing support rebates – i.e. the Low Income Household Rebate, the Family Energy Rebate, the Life Support Rebate and the Medical Energy Rebate – “do not have measurable objectives and therefore can't be assessed for their effectiveness. The structure of rebates providing ongoing support appears complex and inequitable in some case”.²⁴

While the current Low Income Household Rebate does provide much needed relief for many NSW residents, it fails to discriminate between different household sizes and to take into account geographical price variations.

The Society therefore recommends replacing the Low Income Household Rebate with a 17.5% Concession similar to the Victorian model.²⁵ To avoid creating disincentives to energy saving, special requirements should apply above a certain bill amount. The cost of this measure would be funded by Government rather than through cross-subsidisation amongst customers.

We also note with great interest that the NSW Energy and Water Ombudsman is calling for consideration of a social tariff to assist in addressing the issue of affordability of supply.²⁶ Energy Networks Australia defines a social tariff as “a tariff arrangement which contains terms, conditions, and charges that are designed to assist or benefit a defined [...] groups of disadvantaged users [...]. What this typically means for vulnerable customers is that they receive discounted energy prices.” At least eight countries in the EU have social tariffs for energy.²⁷ This includes Belgium, which guarantees a maximum price or social tariff for some protected customers in receipt of certain welfare payments such as the age pension or disability allowance. The social tariff is set twice yearly by the regulator based on the lowest market rate and suppliers are compensated by the Government for lost revenue (difference between the social tariff and a reference price determined by the

²³ NCOSS, June 2017 *Turning off the Lights, The Cost of Living in NSW* Available at: <https://www.ncoss.org.au/sites/default/files/Cost-of-Living-Report-16-06-2017-FINAL.pdf>

²⁴ Audit Office of NSW, September 2017 *New South Wales Auditor General's Report Performance Audit: Energy rebates for low income households* Available at: <http://www.audit.nsw.gov.au/news/energy-rebates-for-low-income-households>

²⁵ Victoria State Government, *Annual Electricity Concession Fact Sheet* Available at: http://www.dhs.vic.gov.au/_data/assets/pdf_file/0006/862251/Annual-Electricity-Concession-fact-sheet_Jan2017.pdf

²⁶ EWON, October 2016, Submission to the AER on Tariff structure statement Available at: <https://www.ewon.com.au/content/Document/Publications%20and%20submissions/Submissions/2016/EWON%20submission%20AER%20NSW%20TSS.PDF>

²⁷ D Deller and C Waddams, Centre on Regulation in Europe, October 2015, *Affordability of utilities' services: extent, practice, policy* Available at: http://www.cerre.eu/sites/cerre/files/Affordability_ResearchPaper_3.pdf

regulator). Closer to home, in Tasmania, the annual electricity concession provides a daily discount to eligible customers (i.e. holders of a DHS or DVA Pensioner Concession Card, DHS Health Care Card, ImmiCard, Tasmanian Concession Card) as a cents per day rate.²⁸

EAPAs

The Energy Accounts Payment Assistance (EAPA) scheme, which helps people experiencing a short-term financial crisis or emergency to pay their electricity or natural gas bill with \$50 vouchers issued by 340 community organisations, was also found to be inequitable by the Audit Office. As a distributor of EAPA vouchers, the Society recognises the improvements permitted by the digitalisation of the scheme but believes that a shift towards a more equitable system is required. The Society distributed \$3,883,700 worth of EAPA vouchers in 2015-16 and \$3,276,150 worth of EAPA vouchers in 2016-17.

The Society recommends improving access to EAPAs. In spite of the shortcomings of EAPAs, some form of crisis support should be maintained to assist people facing *temporary* energy poverty due to unforeseen or changing circumstances. The Society recommends strengthening EAPA guidelines to ensure better access and more consistent provider practices. We support the Auditor General's recommendation to establish a 'Provider of Last Resort' facility for households that cannot access an EAPA Provider.

Brokerage

The NSW Government can ensure that vulnerable households are able to access the best market offers (or a Basic Offer 'no-frills' service). **The Society recommends creating a Brokerage Service for Concession Card Holders.** A not-for-profit brokerage service would enable consumers to receive independent, high-quality and free advice about the best offers, and support them to switch to the most affordable contract.

Pay-on-time discounts and late payment fees

Pay-on-time discounts and late payment fees unfairly target low-income households who often struggle to pay their bills, miss out on these discounts and are further pushed into financial hardship. Consumers who consistently pay on time are less likely to be on retailers' hardship plans. Pay-on-time discounts should be better regulated and set at a level that accurately reflects the additional costs faced by the retailer as a result of a customer not paying their bill on time.

Hardship programs

Retailer hardship programs provide an important protection for consumers. However, as noted above, retailers are only required to offer a payment plan to make the bill payments more manageable. The Society believes that retailers should switch customers on hardship programs to contracts with the lowest prices.

²⁸ Tasmanian Government's website page on discounts and concessions Available at: http://www.concessions.tas.gov.au/concessions/electricity_and_heating

(e) other: energy efficient homes and access to renewable energy

Low-income households often face barriers to substantially reduce their bills. While everyone can switch off the lights when leaving the house or turn down the heater, low-income families have much less capacity to substantially reduce their energy needs (e.g. by purchasing energy-efficient appliances). Those who do not own their home are particularly vulnerable as they are unable to influence the fundamental characteristics of their dwelling (e.g. poor insulation) or access distributive energy resources (e.g. solar).

The Society is supportive of the establishment of standards and programs to improve energy efficiency, including the Office of Environment and Heritage's energy-efficient appliances program²⁹, and access to distributed energy resources.

²⁹ NSW Government, Office of Environment of Heritage Energy-efficient household appliances information page Available at: <http://www.environment.nsw.gov.au/households/appliances.htm>