

DRAFT CLIMATE CHANGE STRATEGIC PLAN AND A DRAFT PLAN TO SAVE NSW ENERGY AND MONEY – SUBMISSION FORM

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Type of organisation	Choose an item.
Type of organisation (if other, please specify)	Energy & Water Ombudsman
Email	janiney@ewon.com.au
Is this a confidential submission?	No [Note: All submissions will be published on our website unless confidentiality is specifically requested]
Would you like to be kept up to date with the development of action plans?	Yes, please keep me updated.

Instructions

Thanks for taking the time to provide feedback on the [Draft Climate Change Fund Strategic Plan](#) and [A Draft Plan to Save NSW Energy and Money](#).

Please use this submission form template to comment on any of the specific potential actions in the draft two plans. There is a section at the end of the form where you can provide comment on the overall strategic approach we have taken.

We invite you to provide comment on each of the three priority investment areas in the *Draft Climate Change Fund Strategic Plan*. For each priority area, we are interested in:

- whether and how we should refine and deliver the potential actions identified
- whether there are other actions that should be considered to deliver the government's priority investment areas.

We have also asked more specific questions on the potential actions in *A Draft Plan to Save NSW Energy and Money*.

Note: You do not need to complete all the fields in the form: Feel free to comment on all of the potential actions, or only the ones you are most interested in.

The submission template is divided into four sections for targeted submissions:

1. Accelerating advanced energy
2. National leadership in energy efficiency (including *A Draft Plan to Save NSW Energy and Money*)
3. Preparing for a changing climate
4. General comments

Please upload your completed form online in Microsoft Word format [here](#). Submissions close at **5pm** on **16 December 2016**.

1. Accelerating Advanced Energy

Please provide any comments on specific potential actions below:

Sections and potential actions	Questions	Responses
<p>2.1 Maximise investment under the national Renewable Energy Target</p> <ul style="list-style-type: none"> investigate a competitive ‘contracts for difference’ funding model to guarantee a minimum price for output from up to 250 MW of new large scale renewable energy, providing benefits to local communities build on the New South Wales 50 MW solar power purchase agreement to expand PPAs to cover all of the renewable energy procurement commitment under the Government Resource Efficiency Policy support initiatives to make it easier for businesses, institutions and local government to buy electricity from renewable energy projects in New South Wales, such as WWF’s ‘Renewable Energy Buyers Forum’ work with the COAG Energy Council to investigate minimum emissions performance standards for new power stations and the role of government in securing an orderly exit of the existing power station fleet advocate for stability and certainty in Commonwealth Government renewable energy policy sponsor energy market reforms to improve network connection processes. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>
<p>2.2 Attract investment in advanced energy demonstration projects</p> <ul style="list-style-type: none"> support research and demonstration projects for 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Click here to enter text.</p>

<p>emerging advanced energy technologies that could provide flexible electricity generation</p> <ul style="list-style-type: none"> support research and demonstration projects for renewable alternatives to natural gas and transport fuels in industrial applications, including concentrated solar thermal, biomass, electrification and hydrogen. 	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>
<p>2.3 Provide start-up funding to accelerate innovation in advanced energy</p> <ul style="list-style-type: none"> work with established business incubators to provide dedicated programs for entrepreneurs and start-ups developing, demonstrating and deploying clean energy and supporting technologies and services sponsor energy innovation events to facilitate collaboration among universities, industry, government and investors develop tools to share information, connect collaborators and promote energy innovation in New South Wales monitor the development of technologies, community attitudes, price signals and share information to encourage investment and support market growth. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>
<p>2.4 Put the New South Wales vehicle fleet on the path to doubling energy productivity</p> <ul style="list-style-type: none"> advocate for higher national fuel efficiency standards investigate appropriate incentives to encourage the purchase of fuel efficient light vehicles and to retire inefficient vehicles, including through stamp duty and registration charges 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Click here to enter text.</p>

<ul style="list-style-type: none"> • provide the right ‘real-world’ information so that businesses and individuals can choose fuel efficient light and heavy vehicles • work with vehicle suppliers and clean energy providers to make zero emission and flexible fuel vehicles available to the New South Wales vehicle market • investigate and consider how the government could best invest in a fleet of electric vehicles, including for public transport, and charging infrastructure at government sites • investigate the case for public investment in electric vehicle charging infrastructure and the requirements for renewable energy power supply • review and extend the Green Truck Partnership approach to demonstrate new technologies for low-emissions light vehicles and freight (road, rail and other). 	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>
<p>2.5 Build capacity of local communities to deliver and own renewable energy</p> <ul style="list-style-type: none"> • build capacity in councils in regional areas to provide advice to their communities on advanced energy 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Click here to enter text.</p>

<ul style="list-style-type: none">• sponsor energy market and financial regulation reforms through COAG to make it easier for community scale projects to connect to the grid and share their benefits• help community energy groups to share knowledge and experience with financing and delivery models to get community energy projects off the ground• deliver connection guides and business case guides for sustainable energy community and residential projects• investigate the best ways to encourage developers to share the benefits of renewable energy projects with the local community.	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>In November 2016, the Alternative Technology Association released a report “<i>Empowering the Future: Appropriate Regulation and Consumer Protections in the Emerging Energy Markets</i>”. This report identified four critical issues that require adequate consumer protections in the changing energy market. These are consumer protection issues around:</p> <ul style="list-style-type: none">• Vulnerable consumers• Explicit informed consent• Dispute resolution• Transaction costs <p>EWON, in a number of submissions to various reviews over the last few years has identified similar concerns. EWON’s submission to the <i>Australian Consumer Law Review Issues Paper</i> argued that:</p> <p><i>“Energy-specific consumer protections are required when a product or service impacts on a customer’s access to a reliable, safe and high-quality supply of energy on fair and reasonable terms.”</i></p> <p>In response to the COAG consultations on stand-alone energy systems and behind the meter consumer protections, EWON identified key consumer protections provided under current arrangements that need to be expanded to cover these new energy supply arrangements.</p> <p>The NSW Government should, in the context of promoting the strong growth of new models of energy supply, also sponsor energy market reform to ensure that adequate consumer protections are developed in tandem with the technological changes. If local communities and individuals are to have confidence in new renewable energy sources, then participation in such projects should occur in a framework that provides an equivalent level of consumer protection that energy consumers currently receive.</p>
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	Are there other opportunities for advanced energy we should be encouraging?	Click here to enter text.
<p>2.6 Identify low-emissions pathways for emissions intensive sectors</p> <ul style="list-style-type: none"> partner with researchers and industry to identify and assess the potential for heavy industrial sites to reduce emissions work with industry to share knowledge of emissions reduction technologies and practices based on a 'learning by doing' approach. 	Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?	Click here to enter text.
	Are there particular issues we need to consider to ensure these actions are effective?	Click here to enter text.
	Are there other opportunities for advanced energy we should be encouraging?	Click here to enter text.
<p>2.7 Reduce emissions in NSW to support achievement of Commonwealth objectives</p> <ul style="list-style-type: none"> Coal Innovation NSW continuing to support research into low emissions coal technologies and encouraging the development and implementation of these technologies, including investigating ways for coal mines to reduce their fugitive emissions, including via the Commonwealth Government's Emissions Reduction Fund strengthen emissions-performance requirements and monitoring in land-use planning and major project-planning approvals processes advocate for Commonwealth, COAG and international action consistent with the Paris Agreement 	Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?	Click here to enter text.
	Are there particular issues we need to consider to ensure these actions are effective?	Click here to enter text.

<ul style="list-style-type: none"> • advocate for improvements to Commonwealth policy and programs to address key emissions sources in New South Wales such as agricultural production systems and transport • support primary industries, including farmers to save emissions or enhance carbon sequestration and attract funding from the Commonwealth Emission Reduction Fund.0000 	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>
<p>2.7 Make Sydney the Asia-Pacific’s carbon market hub</p> <ul style="list-style-type: none"> • seek to make Sydney the Asia-Pacific’s carbon market hub by extending Sydney’s financial and business infrastructure, scaling-up Sydney’s carbon market workforce and encouraging international businesses to headquarter in Sydney. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>
<p>2.8 Identify cost-effective pathways to reduce greenhouse gas emissions to achieve net zero</p> <ul style="list-style-type: none"> • model emissions pathways and their economic impacts taking account of national and international carbon constraints and trends in both government policies and private sector action • monitor and predict the impact of current and new policy initiatives on the state’s emissions performance • develop a plan for New South Wales to achieve net zero emissions. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>

2. National leadership in energy efficiency

A *Draft Plan to Save NSW Energy and Money* provides a greater level of detail on some potential actions in the *Draft Climate Change Fund Strategic Plan*. There are more detailed consultation questions in italics with numbering corresponding to *A Draft Plan to Save NSW Energy and Money*.

Please provide any comments on specific potential actions from the *Draft Climate Change Fund Strategic Plan* **AND** *A Draft Plan to Save NSW Energy and Money* below:

Sections and potential actions	Questions	Responses
<p>3.1 Expand investment under the Government Resource Efficiency Policy</p> <ul style="list-style-type: none"> support councils to upgrade public lighting and adopt the Government Resource Efficiency Policy. implement government energy management and reporting systems to help agencies understand where and how to make energy savings develop clean energy standards for new government funded infrastructure projects and investigate the best way to implement them 	Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?	Click here to enter text.
	Are there particular issues we need to consider to ensure these actions are effective?	Click here to enter text.
	Are there particular communities or industry sectors we should be targeting to improve energy efficiency?	Click here to enter text.
	Are there other opportunities for energy efficiency we should be encouraging?	Click here to enter text.
	<i>Q27: What is the best approach to develop higher sustainability and energy efficiency standards that can apply across a range of infrastructure types?</i>	Click here to enter text.
	<i>Q28: What are the best policy options to facilitate the installation of energy efficient public lighting?</i>	Click here to enter text.
	<i>Q29: What is the best way to support councils to apply GREP?</i>	Click here to enter text.
	<i>Q30: What is the best way to achieve energy and bill savings from hotels used by NSW Government?</i>	Click here to enter text.
	<i>Q31: Are there other ways to save energy through government procurement?</i>	Click here to enter text.

<p>3.2 Improve energy productivity for households and businesses</p> <ul style="list-style-type: none"> • accelerate energy efficient appliance standards under the national Greenhouse and Energy Minimum Standards program • consult on increasing the NSW Building and Sustainability Index (BASIX) targets for new homes to encourage industry innovation and best practice, and reduce energy bills • improve energy standards for new commercial buildings by advocating for new standards • investigate the introduction of energy standards for retail tenancies and common areas in apartment buildings. • partner with supply chains to improve the efficiency of the products available to end consumers. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>In NSW, if you are a customer in Essential Energy's distribution area then you pay \$1.50 per day to be connected to the grid. In the Ausgrid area you pay 89c per day and in Endeavour Energy's area you pay 86c per day, and there are also significant differences in the costs per kilowatt hour customers pay in each area. By using the Energy Made Easy website and comparing a similar household on the same retail offer in the Essential Energy region and the Ausgrid region, regional, rural and remote customers are \$634 a year worse off. When you take into account the more extreme weather (both hot and cold) that inland NSW experiences and the older housing stock in regional NSW that requires higher consumption levels then this difference is much greater. Further in the context of a higher cost of living i.e. petrol, travel distances and food costs, this gap widens even further.</p> <p>It is EWON's view that the communities in regional and rural NSW should be key targets for energy efficiency schemes. Remote communities with significant indigenous populations could be even higher priority targets within a program that is designed around the needs of regional NSW.</p>

	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>Click here to enter text.</p>
	<p><i>Q8: What is the best way to keep BASIX standards up to date?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q9: How can better information on BASIX performance help consumers and industry to understand the benefits of better designed and more energy efficient homes?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q11: What is the best approach to achieve energy and bill savings from common areas and shared services in apartment buildings?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q12: Could the NSW Government achieve energy savings from precinct-scale developments, high-growth areas and by partnering with local government areas?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q13: What would be the benefits and impacts of encouraging precinct-scale or local government area energy savings for new homes and other buildings?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q20: What level of stringency increase should the NSW Government advocate for to deliver significant and cost-effective energy savings?</i></p>	<p>Click here to enter text.</p>

	<p><i>Q21: What role, if any, could the NSW Government play to help businesses access private finance to help them adjust to improved energy standards for new commercial buildings?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q22: What other approaches could be taken to achieve energy and bill savings from commercial buildings?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q23: What are the potential benefits and impacts of this option?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q24: What other approaches could be taken to achieve energy and bill savings from large retail buildings?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q25: What are the potential benefits and impacts of this option?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q34: What is the best approach for the NSW Government to support the acceleration and expansion of GEMS?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q36 Are there opportunities to enhance the national Energy Rating Label system that could deliver significant energy savings?</i></p>	<p>Click here to enter text.</p>

<p>3.3 Support industry to realise cost-effective energy productivity opportunities</p> <ul style="list-style-type: none"> • support large energy users to investigate energy savings opportunities. • support industry sectors to adopt best practice energy management practices 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>Click here to enter text.</p>
	<p><i>Q14: What is the best approach to providing funding or other support for large energy users to prepare plans?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q15: The NSW Government could determine program participation by targeting a set a number of large energy users, or by setting an energy consumption threshold.</i></p> <p><i>What is the best approach to determine which large energy users could be included in a program?</i></p>	<p>Click here to enter text.</p>

	<p><i>Q16: Payback periods or internal rates of return could be suitable ways to determine what makes a 'cost-effective' energy efficiency opportunity. What is the best approach to define 'cost-effectiveness'?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q17: Are there instances where large energy users should be exempt from preparing a plan? If so, under what circumstances?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q18: Is requiring energy management systems similar to those applied in Germany or the United States appropriate for large energy users in NSW?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q19: Are there other initiatives or approaches that NSW should consider that could be effective in enabling large energy users in NSW to implement cost effective energy efficiency opportunities?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q26: What opportunities may be available to the NSW Government to further promote waste heat recovery?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q35: Are there opportunities for the NSW Government to work with the hot water industry to explore innovations that can save energy and money?</i></p>	<p>Click here to enter text.</p>

<p>3.4 Drive clean energy upgrades for rental households</p> <ul style="list-style-type: none"> • provide ratings for homes at the point of sale or lease to help renters and buyers know which properties would be cheaper to run and more comfortable to live in • improve energy performance of tenanted homes to make them more affordable and liveable for renters. • investigate opportunities to work with other jurisdictions on common approaches to energy efficiency in rental properties. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Proposals about the establishment of energy efficiency standards for rental housing have the potential to provide important information to a consumer when making a decision to lease a property. There is a major difficulty at the lower end of the housing market where there is a combination of a shortage of rental property, combined with an affordability crises in the private rental market. Energy efficiency upgrades may make it more difficult for low income consumers to find affordable accommodation and increase the cost of rent beyond the energy savings that may be made. Any decisions in this area need to be carefully considered in order to provide a real benefit to all consumers</p>
	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>Click here to enter text.</p>

	<p><i>Q1: What are the best approaches to deliver a ratings program in a way that will drive implementation of energy efficiency and grow the market for energy efficient homes and upgrades?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q2: What are the key attributes for a voluntary ratings program to be considered successful and justify transition to a required scheme?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q3: The NSW Government has identified performance standards, technology standards, and an incentive program as potential approaches to improve energy efficiency standards for tenanted homes.</i></p> <p><i>What is the best approach or combination of approaches and why?</i></p>	<p>Energy inefficiency in accommodation is almost always a combination of poor or old infrastructure combined with inefficient technology, especially water heating technology. This combination leads to excessive energy bills for consumers living in old and poor quality housing stock. It is essential that if standards are to be introduced, then they need to apply to both the infrastructure of the premises and the technology installed in that premises. For housing stock at the lower end of the rental market, competition and consumer choice will not, in itself, lead to the necessary investment by landlords to achieve energy efficient standards. The introduction of performance standards will require an incentive program to assist landlords meet standards in a way that doesn't adversely impact on housing affordability.</p>

	<p><i>Q4: Housing stress includes rent and energy bill pressures.</i></p> <p><i>What are the best approaches to reduce energy bill pressures for tenants without increasing housing costs and why?</i></p>	<p>If the approach of introducing energy standards (either voluntary or mandated) is to be undertaken, then EWON proposes some key principles:</p> <ul style="list-style-type: none"> • Any standards should apply equally to all private, public and community accommodation • The introduction of standards should be indicated well in advance of implementation • Funding should be available to landlords • Tenants should be protected from rent increase resulting from improvements to meet new standards • If standards are mandatory there needs to be a simple compliance regime • Tenants seeking compliance need protection from retaliatory action i.e. eviction or increased rent leading to the tenant's decision to vacate • Provisions should be made for exemptions, for example heritage listed buildings or buildings scheduled for demolition, and for improving accommodation over time <p>Finally there are other jurisdictions that have introduced energy standards for rental properties. In particular, New Zealand, England and Wales have all introduced legislation. These models should be explored and any NSW approach should be based upon best practice that is informed by these examples.</p>
	<p><i>Q5: On-bill financing and other innovative financing mechanisms could allow owners to share upgrade costs with tenants.</i></p> <p><i>What is needed to help landlords to improve the energy performance of tenanted homes?</i></p>	<p>Click here to enter text.</p>

	<p><i>Q6: What are the best approaches to deliver a ratings program for tenanted homes in a way that will drive implementation of energy efficiency and grow the market for energy efficient homes and upgrades?</i></p>	<p>Click here to enter text.</p>
	<p><i>Q7: What are the key attributes for a voluntary ratings program for tenanted homes to be considered successful and justify transition to a required scheme?</i></p>	<p>Click here to enter text.</p>
<p>3.5 Support vulnerable households to reduce their energy bills</p> <ul style="list-style-type: none"> • upgrade social housing by reviewing and expanding the Home Energy Action program, strengthening partnerships and developing innovative financing mechanisms. • as part of a review of energy concessions, the government will investigate the use of energy rebates and other innovative mechanisms to fund energy efficiency upgrades, taking account of community views • provide bill reduction advice that is tailored to the needs of vulnerable customers identified through 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>It is critical for supporting vulnerable households that residents of public and community housing in regional, rural and remote NSW are a priority target.</p>
	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>Click here to enter text.</p>

<p>better information.</p>	<p><i>Q10: What is the best approach to help vulnerable households save energy and money?</i></p>	<p>Reduction of energy costs can be a simple and achievable mechanism for reducing financial pressure on low income households. While changing some poor day to day behaviour can assist in cost reduction, many low income households already constrain their consumption. Behavioural change initiatives have their place; however they need to be supported by an emphasis on structural change in order to be effective. Inefficient structural features such as hot water systems or old air conditioners lock households into expensive energy consumption. Inefficient appliances such as second-hand fridges and heaters are more affordable and often lack accessible information about running costs.</p> <p>Specific programs such as the Home Energy Action Program (HEAP) are an excellent way of addressing structural energy inefficiency in low income households. EWON endorses an expansion of HEAP and welcomes a review in 2018 which should focus on identifying opportunities for improvement of the program. EWON strongly endorses the proposal to expand the HEAP program to include public and Aboriginal housing tenants.</p> <p>A closer liaison between energy retailers and HEAP would provide a joint opportunity to better target assistance. The ability of retailer hardship programs to offer direct referral for customers (who by their very participation in the hardship program have been identified as needing assistance) would ensure that those most at risk of energy poverty are provided with immediate assistance in reducing their consumption.</p> <p>The proposal to review energy concessions with a view to the possible use of rebates to fund energy efficiency upgrades is a challenge. The current low income household rebate is, for many recipients, a factor that contributes to energy bills being paid.</p> <p>In 2013 EWON convened a National Energy Affordability Roundtable. The first recommendation of this roundtable was for a review of the concession framework. In our response to section 3.2 above we identified that there can be a \$634 difference in an</p>
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<p>3.6 Support small businesses to increase their energy productivity</p> <ul style="list-style-type: none"> invest in market capacity to deliver innovative energy efficiency products and services to small businesses and collect data to inform the Energy Savings Scheme continue to provide energy efficiency training to general business advisers. 	Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?	Click here to enter text.
	Are there particular issues we need to consider to ensure these actions are effective?	Click here to enter text.
	Are there particular communities or industry sectors we should be targeting to improve energy efficiency?	Click here to enter text.
	Are there other opportunities for energy efficiency we should be encouraging?	Click here to enter text.
	<i>Q32: Are targeted incentives an effective way to deliver energy savings and kick-start new activities in the Energy Savings Scheme?</i>	Click here to enter text.
	<i>Q33: Are there more effective ways to grow and transform the market for energy efficiency products and services?</i>	Click here to enter text.
<p>3.6 Ensure that 40% of participants in the NSW Government clean energy program are in regional NSW</p> <ul style="list-style-type: none"> provide information on the business proposition for energy efficiency service providers in regional New South Wales such as a map of known energy efficiency opportunities. 	Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?	In our response to section 3.2 EWON emphasised the need for regional communities to be key targets for improving energy productivity. Those arguments equally apply to the clean energy program driving energy efficiency and EWON welcomes a targeted approach to regional, rural and remote NSW.
	Are there particular issues we need to consider to ensure these actions are effective?	Click here to enter text.
	Are there particular communities or industry sectors we should be targeting to improve energy efficiency?	Click here to enter text.
	Are there other opportunities for energy efficiency we should be encouraging?	Click here to enter text.

<p>3.7 Reduce peak demand through battery storage and other demand management measures</p> <ul style="list-style-type: none">engage with the COAG Energy Council to reform the National Electricity Rules to reduce barriers to	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p>	<p>Click here to enter text.</p>
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<p>broad based demand management</p> <ul style="list-style-type: none">• advocate to the Australian Energy Regulator for greater implementation of demand management by network businesses• jump start the demand management market during the current regulatory cycle with reverse auctions to reduce peak demand using technologies such as appliance demand response and battery storage• work with network businesses and energy efficiency service providers to coordinate information required to target energy savings at grid constrained areas.	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>The rapid expansion of distributed generation, especially battery storage which is then fed back into the grid and the wholesale electricity market, has significant structural implications for the NSW transmission and distribution networks. While the long term result will be to significantly reduce the cost of capital infrastructure for the network businesses, there will still be short term costs. The 16,000 gigawatt hours energy savings by 2020 target will impact network revenues, while at the same time networks will need to be adapting their infrastructure to facilitate distributed generation. Such a change will come at a price.</p> <p>These two initiatives of the NSW government will be undertaken in a regulatory environment that is driving networks to restructure tariffs to be cost reflective. Therefore there is a potential that a regulatory process (tariff reform) that was designed prior to the proposals in the Climate Change Fund Strategic Plan could combine in a way that leads to a short term price spike. This will adversely impact vulnerable consumers and communities. There is a possibility that the end result could see the development of an energy divide that parallels the growing digital divide. This is especially so for low income consumers who will be excluded from a completely market driven approach to energy efficiency measures. EWON is already receiving complaints from consumers who are being excluded from the digital meter rollout because they live in areas without adequate mobile phone coverage.</p> <p>The draft strategic plan outlines a role for the NSW Government in reforming the National Electricity Rules to facilitate wide scale demand management measures. It also proposes a role of advocating that the Australian Energy Regulator look more closely at demand management when regulating networks. There is also a need for the NSW Government to understand the potential impact of the range of measures proposed in the Strategic Plan on tariffs and to then engage with the COAG energy Council and the AER to ensure that the tariff reform process currently underway does not result in adverse customer outcomes</p>
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	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>See comments in response to 3.2</p>
	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>Click here to enter text.</p>
<p>3.8 Steward the energy savings market to help households and businesses save energy and save money</p> <ul style="list-style-type: none"> align the Energy Savings Scheme with those in other states and territories continuously improve the Energy Savings Scheme Rule and targets to provide new opportunities for households and businesses to save energy improve contracts and business cases for Environmental Upgrade Agreements and other mechanisms in consultation with industry and the multi-unit residential sector expand innovative financing models including rates-based financing and green bonds. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>Click here to enter text.</p>
<p>3.9 Identify energy efficiency measures that could double New South Wales' energy productivity</p> <ul style="list-style-type: none"> establish an Energy and Resource Efficiency Research Hub in collaboration with the research 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to drive energy efficiency?</p>	<p>Click here to enter text.</p>

<p>sector to build expertise in energy efficiency and support innovators to assess the performance of new products</p> <ul style="list-style-type: none"> • monitor and publish New South Wales energy use, energy savings and energy-efficiency sales data in collaboration with the energy services sector and the COAG Energy Council • research the design of programs that are more effective in influencing consumers and suppliers to save energy • provide funding to measure and verify energy savings in targeted industry sectors and technologies • investigate the introduction of an energy productivity target for New South Wales and the form that it could take. 	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there particular communities or industry sectors we should be targeting to improve energy efficiency?</p>	<p>Click here to enter text.</p>
	<p>Are there other opportunities for energy efficiency we should be encouraging?</p>	<p>Click here to enter text.</p>

3. Preparing for a changing climate

Please provide any comments on specific potential actions below:

Sections and potential actions	Questions	Responses
<p>4.1 Ensure 100% of NSW Government agencies are taking action to manage their climate change risks</p> <ul style="list-style-type: none"> • prepare best-practice guides, tools and targeted training to help government agencies identify and manage climate change risks • support government agencies to meet their requirement to undertake initial climate risk assessments and develop appropriate responses • develop a framework for reporting government agencies' adaptation initiatives to foster best practice • build the capacity of land management agencies to enhance bushfire management and prevention. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to prepare New South Wales for the impacts of climate change?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there positive opportunities from climate change we should be targeting?</p>	<p>Click here to enter text.</p>
<p>4.2 Increase awareness of climate change risks in industry sectors and local governments</p> <ul style="list-style-type: none"> • help the primary industries, energy and infrastructure sectors understand how they can respond to climate change risks and capture opportunities • build capacity in coastal councils to respond to climate change risks • build capacity in local councils and joint organisations to understand and coordinate local responses to climate change impacts • provide tailored information resources and updated climate change projections, including expanding the AdaptNSW website, on practical cost-effective ways to reduce risks for local councils and communities. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to prepare New South Wales for the impacts of climate change?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there positive opportunities from climate change we should be targeting?</p>	<p>Click here to enter text.</p>

<p>4.3 Grow the adaptation services market</p> <ul style="list-style-type: none"> establish an adaptation innovation fund to support innovation and entrepreneurialism that could protect our local communities and provide export opportunities investigate the need for accreditation schemes and information hubs for professional services involved in climate change adaptation such as agriculture, emergency preparedness and health improve building standards and planning requirements to take into account the impacts of climate change investigate and develop rating systems to assess the climate resilience of residential and commercial properties and infrastructure. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to prepare New South Wales for the impacts of climate change?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there positive opportunities from climate change we should be targeting?</p>	<p>Click here to enter text.</p>
<p>4.4 Assist local communities to reduce their exposure to natural hazards</p> <ul style="list-style-type: none"> minimise the impacts of climate change on socially and economically disadvantaged urban, regional and remote communities through social impact investment for actions such as upgrading homes, community facilities and infrastructure assist in making private finance, such as resilience bonds, available for households and businesses to adapt to climate change through partnerships with the finance and insurance sectors support innovative pilot projects that demonstrate best practice adaptation and can be replicated in other regional communities or local government areas. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to prepare New South Wales for the impacts of climate change?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there positive opportunities from climate change we should be targeting?</p>	<p>Click here to enter text.</p>
<p>4.5 Increase canopy coverage in heat exposed suburbs and regional towns</p> <ul style="list-style-type: none"> implement a program of information, tools and 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to prepare New South Wales for the impacts of climate change?</p>	<p>Click here to enter text.</p>

<p>funds for demonstration projects to improve green cover in our cities and regional towns</p> <ul style="list-style-type: none"> investigate how to encourage the use of natural ecosystems to reduce the effects of climate change on people, communities and infrastructure, for example through flood mitigation and preventing coastal erosion. 	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>EWON receives complaints about electricity networks' vegetation management practices. EWON is participating in an Ausgrid Vegetation Management Working Party which is exploring the many issues associated with this, a key one being the unsuitability of many trees that have been planted under power lines. The NSW electricity networks and Local Governments need to work together to better identify suitable vegetation and begin a replacement program that results in better canopy coverage that also meets the needs of local ecosystems.</p>
	<p>Are there positive opportunities from climate change we should be targeting?</p>	<p>Click here to enter text.</p>
<p>4.6 Improve understanding of climate change impacts in priority sectors</p> <ul style="list-style-type: none"> update and enhance the state-wide climate projections developed with NARClIM, including projections for longer time periods and under different emissions scenarios produce hazard maps and reports for key hazards, such as flood, bushfire, drought and heat, to help decision makers understand risks co-fund new research on extreme climatic events, such as extreme rainfall or wind, to understand future risks as part of the NSW Adaptation Research Hub co-fund new research into climate change risks and adaptation options for priority sectors, such as primary industries, health, water security and vulnerable communities, as part of the Adaptation Research Hub identify risks to critical public infrastructure, such as energy, water, transport and health infrastructure and options to manage these future risks. 	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to prepare New South Wales for the impacts of climate change?</p>	<p>Click here to enter text.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>Click here to enter text.</p>
	<p>Are there positive opportunities from climate change we should be targeting?</p>	<p>Click here to enter text.</p>

4. General comments

This section provides an opportunity for any general comments on the overall strategic approach of the *Draft Climate Change Fund Strategic Plan AND A Draft Plan to Save NSW Energy and Money*.

Questions	Responses
The government is interested in your feedback on whether and how we should refine and deliver the potential actions identified.	Click here to enter text.
The government is interested in your feedback on whether there are other actions that should be considered to deliver the government's priority investment areas.	Click here to enter text.