

28 August 2026

Mr Geoffrey Rutledge
Chief Executive Officer
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2001

Online via: www.aemc.gov.au

Dear Geoffrey

Discussion paper – review of the integrated system plan framework - EPR0092

The Energy & Water Ombudsman NSW (EWON) investigates and resolves complaints from customers of electricity and gas providers in NSW, and some water providers.

Since December 2024, EWON's jurisdiction expanded to include complaints from landholders and community members impacted by renewable energy transmission infrastructure. As a result, EnergyCo and ACERZ became EWON members, in addition to Transgrid which has been an EWON member since 1998. Our comments are informed by the enquiries and complaints we have managed since then, together with insights from our community outreach and stakeholder engagement activities.

In FY26, EWON held 35 community engagement events across NSW for communities directly impacted by the energy transition, providing direct access for community members to our services.

Through this role, we have seen first-hand the importance of trust, transparency and confidence in supporting successful energy market reforms and consumer participation in the energy transition.

We support the AEMC's review of the Integrated System Plan (ISP) framework and recognise the important role the ISP plays in decisions and works that will shape Australia's future energy system.

We call on the AEMC to develop a framework that will support a consumer-focused energy system and build consumer and stakeholder trust and confidence in long term energy planning.

Consumer trust and confidence

As the energy transition progresses, planning decisions increasingly affect consumers and consumers are becoming more active participants in the energy market through the uptake of solar, batteries, electric vehicles and other new energy services.

We have observed that consumers are more likely to support significant change when they feel heard and involved. Particularly when decision making processes are transparent, information is accessible and opportunities for consultation are meaningful.

Early and ongoing engagement helps consumers understand how decisions may affect them, gives them opportunities to raise concerns, and builds confidence in the entities responsible for shaping Australia's future energy system.

Consumer participation and outcomes

While long-term energy planning must continue to support reliable, secure and efficient energy supply, consumers also value affordability, fairness, accessibility, choice and confidence in decision-making.

A framework that works well technically but is poorly understood, inaccessible or perceived as unfair may undermine confidence in the energy transition. Considering consumer outcomes alongside system outcomes will help consumers understand planning decisions and contribute to the support needed from the communities they are intended to serve.

Consumers will also experience both the costs and benefits of transition differently. Not all consumers can install rooftop solar, purchase batteries, electrify their homes or directly participate in emerging energy markets. Consideration of these impacts is important to ensure the benefits of the transition are shared broadly so that consumers are not disadvantaged by an inability to participate.

Energy planning processes should embed meaningful consumer participation in every stage. Consumers often only become aware of planning decisions when infrastructure is proposed, costs are reflected in bills, or policy decisions directly affect them. In EWON's experience, engagement is most effective when it occurs early, continues throughout the planning process, and is supported by clear, plain-English information. Participation opportunities should be accessible to a diverse range of consumers and communities, including those experiencing vulnerability or facing barriers to participation.

In summary, as consumers become increasingly central to the operation of the energy system, EWON encourages the AEMC to ensure that the ISP:

- Recognises the growing role of consumers in the energy transition.
- Requires meaningful consumer engagement and participation.
- Promotes transparency and accessibility of energy planning processes and decisions.
- Considers the impacts of planning decisions on different consumer groups, including vulnerable customers or those facing barriers to participation; and
- Delivers outcomes that are affordable and reliable for all consumers.

If you would like to discuss this matter further, please contact Bryce Purches, Manager Policy & Systemic Issues (brycep@ewon.com.au)

Yours sincerely



Janine Young
Ombudsman
Energy & Water Ombudsman NSW