



1 May 2026

Mr Mark Banasiak
Chair
Portfolio Committee No. 4 – Regional NSW

Dear Mark

NSW Parliamentary Inquiry – Impact of Renewable Energy Zones (REZ) on rural and regional communities and industries in New South Wales

Thank you for the opportunity to provide further advice to the Committee, following on from our evidence provided at the hearing on the 31 March 2026.

Please find following detailed responses to each question raised.

I also note the three key requests of this Inquiry from my opening statement; that is, to direct:

- renewable energy infrastructure entities to promote their openness to complaints to landholders and community members, including the right to contact the Ombudsman;
- the introduction of legislative change by the NSW government for renewable energy generation and storage developers to be members of EWON;
- a single narrative to be promoted by the energy sector and government; about the why, where, what and how of energy transition and the support that's available to regional communities.

I am also writing to clarify evidence provided at the hearing on 31 March 2026 and request your consideration of amendment or clarification of the evidence.

The statements in the uncorrected transcript we seek to be amended and/or clarified are:

1. On page 8 my fourth statement includes reference to EWON writing to Transgrid, EnergyCo and ACERREZ requesting they tell developers about EWON. I request this evidence be amended and clarified with the addition of the information below, as I did not write to ACERREZ with this request.

A suitable footnote could be:

EWON wrote to Transgrid and EnergyCo requesting they advise the developers they are working with of EWON's role and encourage engagement with EWON to support expansion of membership to include generation and storage developers and participate in consultation to inform development of a fee model for REI developers. EWON did not write to ACERREZ with this request as EnergyCo is responsible for contact with generation and storage developers in the Central West Orana Renewable Energy Zone.

2. On page 9 my fourth statement includes reference to EWON taking complaints from community members directly and indirectly impacted by renewable energy infrastructure development. Under the EWON Charter a complaint can be made by consumer and by other persons *directly affected by the provision or supply of Energy or Water Services*. EWON interprets this to mean a complaint must be made by an individual who can demonstrate a direct impact on them (e.g. how the actions of a infrastructure developer has impacted the individual). In practice, EWON considers complaints by landholders, neighbours and community members where there is a clear link between the actions of the infrastructure developer and the impact on the complainant. I request the below information be added to the transcript to clarify this evidence.

A suitable footnote could be:

EWON can take complaints from any individuals directly impacted by renewable energy infrastructure development. This includes landholders with infrastructure development on their land; and also neighbours and local community members impacted in other ways.

We welcome any further opportunity to engage in the inquiry – for clarification of any of our responses, please contact Ms Stephanie Sall, Head of Energy Transition, stephanies@ewon.com.au.

Kind regards



Janine Young
Ombudsman & Chief Executive Officer
Energy & Water Ombudsman NSW



Response to Supplementary Questions

1. You said complaints “mirror your presence” - does that mean communities without EWON outreach effectively have no functional complaints pathway?

Community members / landholders in areas impacted by Renewable Energy Infrastructure (REI) development that we have not visited yet may have limited awareness of how EWON can assist. This does not mean there is no pathway for community member complaints from those areas to get to us – it relies on energy company (retailers, networks, transmission and renewable energy) promotion of their membership of EWON or prior knowledge of EWON by the community member / landholder.

EWON has a free-call phone number and dedicated REI line for community members / landholders to contact us by phone. We also have information on our website and an online complaint form community members / landholders can use to lodge a complaint. We have also engaged extensively with local councils and other stakeholders in these areas, as an additional avenue to spread the word about our role. From our contact with local councils and MPs, we know many community members contact them with complaints about REI development, which is why we prioritise our meetings with these local connections.

A key requirement of EWON membership is for members to promote their internal complaint handling process and the right to contact EWON, as the approved external dispute resolution scheme for NSW. In registering complaints, we track how community members / landholders hear about our services. Our complaint data indicates that community members / landholders contacting us in our REI function predominantly learn about EWON and how we can assist when they see us at local events or through local promotion of our events. This contrasts with our general complaints data indicating that many customers learn about EWON from information provided about EWON on their energy bills – which is a legislated requirement.

2. How many REZ-affected communities have had no direct EWON engagement at all?

EWON has attended 41 community markets, agricultural shows and field days, met with 16 regional councils and several other stakeholders in 29 regional towns across NSW since expanding our role on 1 December 2024 to the end of March 2026. We have held nine drop-in sessions in seven regional towns in the Central West Orana REZ and the New England REZ with plans to reach a further seven towns in the South West REZ and Hunter Central Coast REZ before the end of this financial year.

As of March 2026, we have yet to attend community events in the Illawarra REZ as this is the least advanced REZ. The EWON Team has been in the Illawarra region though, with EWON’s general outreach team hosting a Bring Your Bills event in Wollongong in 2025 and attending other community hosted events and interagency meetings in the region in recent months.

3. If awareness is the limiting factor, isn’t the current complaints data fundamentally unreliable as an indicator of community impact?

EWON’s unique complaint data is a valuable indicator of issues, trends and areas for improvement. While the complaint numbers in our REI function are low in comparison to our other functions, there is inherent value in examining any number of complaints. Even one complaint can identify individual impacts and potential trends as well as systemic issues, therefore highlighting opportunities for improved practices or regulatory change.

Our policy submissions and public reports, including quarterly Insights and systemic issues SpotlightOn reports, draw on complaint data and insights from community and stakeholder engagement.

These can be based on a small or large number of complaints. This in turn informs our policy position, aligned with complaint issues and demonstrates the action and/or changes necessary to enhance protections or correct a particular issue.

The EWON Charter¹ requires EWON to identify possible systemic issues, whether systemic to a particular member or systemic to a group or type of members, and where appropriate investigate these. We track complaints and issues in a variety of ways, in addition to the number of complaints on a particular issue, and in our experience an issue raised by a single complaint can lead a systemic issue investigation and action with a member and/or the regulator to improve practices.

4. You confirmed generation and storage are outside jurisdiction – does that exclude a significant portion of REZ impacts from independent oversight?

Most complaints to date to EWON in our REI function are about REZ development or transmission. Currently, about 29% of REI complaints to EWON are about generation and storage. In dealing with complaints about generation and storage, as these entities are not yet members of EWON, we are limited to providing community members / landholders with independent information about community consultation guidelines, the planning process, where they can access information, how to raise complaint with the developer directly and, we also refer them to the Australian Energy Infrastructure Commission (AEIC).

Currently, the AEIC provides independent oversight of generation and storage as an independent role appointed by the Australian Government, reporting to the Minister for Climate Change and Energy and the Australian Government. While the AEIC helps people resolve complaints about renewable generation and storage, unlike EWON, the AEIC does not have binding decision-making powers (EWON does) which require the energy entity to take specific action/s to resolve a complaint.

5. How many complaints have you received that you could not act on due to jurisdiction limits?

Between 1 December 2024 to 31 March 2026, we finalised 76 complaints in our REI function. Of those, 22 complaints were about generation and storage where we provided independent information and referred the community member / landholder to the AEIC for further assistance. Lack of jurisdiction does not prevent us from providing independent advice and information – and we record these complaints to report on them and to also support why these entities should be EWON members.

EWON takes an inclusive approach in determining jurisdiction. We consider a complaint within our jurisdiction until it can be clearly assessed as not something we can investigate. We have a ‘no wrong door’ referral process and refer complaints that we are not able to investigate to the most appropriate entity, most commonly the AEIC. We have effectively referred a generation complaint to a solar developer who contacted the customer within days of our referral and met with us to discuss our role and how we help build trust in the energy sector / transition across NSW.

6. Would you accept that the current framework leaves impacted communities without a single comprehensive complaints body?

Building on responses to questions 4 and 5 above, it is clear, there is currently a gap in protections within the current framework leaving community members / landholders without a single comprehensive complaints body. EWON provides independent advice and information about renewable energy generation and storage projects however, as a membership-based industry ombudsman, we can only investigate complaints about our members. We have been operating as the approved external dispute resolution scheme in NSW for over 25 years with several expansions of our

¹ [EWON Charter](#)

membership over that time. As the energy system evolves so too must EWON and we rely on Government (State or Commonwealth) to enact legislative or regulatory levers that enables this to occur. All NSW residents should have free, fair and independent access to EWON for energy related issues.

We have been working with the NSW Government to enable the expansion of our functions to include investigating complaints about renewable energy generation and storage. This is in line with the recommendations from the AEIC's Community Engagement Review and the NSW Standing Committee on State Development's Inquiry into the feasibility of undergrounding the transmission infrastructure for renewable energy projects. The only barrier is for Government to establish a mandatory mechanism that requires renewable developers of generation and storage projects to become EWON members. Current EWON members are required to join as a condition of their licence or authorisation. For EnergyCo, it was a government directive. A clear regulatory and/or licencing framework is needed to establish clear rules and regulations for generation and storage developers, including the requirement to join EWON. We understand Victoria is currently looking to establish a licencing framework for developers.

In working with Government to expand membership we have considered options to require membership by agreement or accept membership on a voluntary basis. These alternative options are not appropriate, as they will not provide the necessary protections, including a 'single comprehensive complaints body' needed for all landholders and community members impacted by REI development. Voluntary membership also introduces reputational, operational and financial risks to EWON and therefore is not a viable way forward.

7. Given you are funded by industry and government, what safeguards prevent perceived or actual bias in REZ-related complaints?

EWON's independence is enshrined in our foundations. The energy ombudsman function is established in NSW legislation². In accordance with EWON's Constitution and Charter, the Board and Ombudsman ensure that independence underpins all the work we do.

Every five years, an independent review tests EWON's services in meeting the Benchmarks for Industry-based Customer Dispute Resolution³ and reports on their findings. The independent review includes analysis of our systems and process, reviews complaint investigations and referrals and includes extensive engagement with stakeholders, industry and members. All aspects of the review focus on ensuring EWON's independence.

In the most recent review in 2024, the independent review⁴ of EWON found that:

- EWON operates in accordance with the Benchmarks for Industry-based Customer Dispute Resolution – including independence
- EWON is an excellent industry ombudsman scheme.
- Our community outreach program represents best practice.
- EWON's approach to supporting vulnerable and disadvantaged complainants received praise from members and all stakeholder groups interviewed for our work in this area.
- Our casework demonstrates high levels of both procedural and distributive justice.
- EWON is seen to be one of the few trusted voices in the energy sphere.

² [Electricity Supply Act 1995 s96B](#)

³ [Benchmarks for Industry-based Customer Dispute Resolution](#)

⁴ [Independent reviews - Energy & Water Ombudsman NSW](#)

Independence is also one of EWON's values.⁵ We are impartial, we approach our work transparently and openly. Independence is at the core of everything we do, in the frameworks, systems and processes we work by, in the way we communicate with members, industry, government and customers. EWON does not advocate for consumers nor industry – it focuses on re-building relationship between consumers and energy and water companies as part of complaint resolution. This is critical for renewable energy entities given their long-term presence in regional and rural communities and for landholders, the long-term land access arrangements that require effective ongoing relationships.

The EWON Board ensures EWON's independence through having an independent Chair, and equal composition of directors with either consumer or industry background / experience. A twice-yearly Consultative Council Meeting is also established under EWON's Constitution to provide a forum for us to engage and consult with consumer groups, community leaders, small business peak bodies, industry stakeholders and all members.

EWON is funded by members on a not-for-profit basis. Funding is based on both fixed and variable levies, both calculated on a user pays basis (fixed by energy sector and variable based on complaint volume by member).⁶ The funding model is underpinned by principles based on:

- equity and fairness
- transparency and efficiency
- consistency and predictability
- simplicity and affordability.

Like other industry ombudsman offices, comparable to the Australian Financial Complaints Authority and Telecommunications Industry Ombudsman, industry funding is at the core of having those members whose service results in complaints to EWON being paid for by those members – a clear message aimed at driving improvements in consultation, complaint management and customer service.

The NSW government grant covered the operational set-up of the REI function, including establishing an ongoing fee-model for REI members. This ensured the operational costs of the expansion of EWON's services into REI was separate from ongoing operations and not funded by members in other sectors. The current NSW government grant to establish our REI function ends in June 2026.

8. Has any complaint outcome ever conflicted with the interests of a funding member?

Our complaints processes resolve complaints through conciliation / negotiation on a fair and reasonable basis for both parties, having regard to laws, codes and regulations; good industry practice and the individual circumstances of the complaint / complainant. In resolving disputes, we are not seeking to find in favour of either the community member / landholder or energy company / developer. As mentioned in response to a prior question, a key focus is on rebuilding relationships between the two parties given the ongoing long-term relationship between both parties.

EWON's role is to independently handle complaints about the conduct of our members fairly, informally and expeditiously, without charge to the person making the complaint. There have been complaints where the resolution has not been in the favour of an EWON member, similarly we have resolved complaints that do not find in favour of the community member / landholder and/or do not meet the expectation of what the community member / landholder was seeking.

⁵ [EWON's values](#)

⁶ [EWON's Funding Model](#)

EWON's Impact report,⁷ tabled during the Inquiry, contains several case studies and the basis on which complaints are resolved.

9. If trust is already low in communities, how does your funding model avoid reinforcing that distrust?

Building on the response to question 7 above, EWON's independence and longstanding positive reputation in the energy sector has made us a trusted voice in the sector. In our most recent independent review, the review team found that *"EWON is seen to be one of the few trusted voices in the energy sphere. Such a position is very difficult to attain, easy to lose, but of the utmost importance to the members of EWON, service users and the wider public as it enables EWON to make significant contributions to the effectiveness of the energy market."*⁸

As outlined in the response to question 7 above, EWON's funding as an industry ombudsman scheme does not impact our independence, or adherence to the Benchmarks for Industry-based Customer Dispute Resolution.⁹

The primary role of industry-based dispute resolution offices is to encourage public trust in the industry over which they have jurisdiction and not simply to resolve complaints. EWON exists as part of the industry's integrity function.

10. You cannot alter project routes of stop projects – so what practical leverage do you have in disputes over major impacts?

Our role is to ensure the correct process and procedures are followed and to assist community members / landholders with independent information, advice and assistance, including informing community members / landholders of their rights and responsibilities in the process. We are not a legal office, nor the government decision-maker. Our "No Wrong Door" approach ensures that community members / landholders have assistance to navigate the services available to them, in this way we support community members to find the best place to deal with their issue, including seeking legal advice.

As outlined in the evidence provided, we resolve complaints by bringing the parties together, so they can understand each other's perspectives and work towards a mutually agreeable outcome. Some complaints are resolved by providing independent information about specific regulations or guidelines. Others require analysis of contact logs and engagement notes to determine whether the actions of REI entities meet specific requirements. I spoke about a complaint at the hearing, where we conducted a conciliation conference on site with the landholder and senior representatives of the REI entities, canvassing all the issues and agreeing actions to be taken. The outcome of that conciliation was not that the proposed transmission route was changed, but that both parties understood and accepted each other's perspective and concerns. The landholder acknowledged the positive process of the conciliation and remarked that it was "the best discussion he had had during the whole time he had been engaging with the REI entities over property acquisition and land access". We anticipate that there will be many more conciliation conferences like this as REZ developments expand.

11. If a landholder's core issue cannot be remedied within your powers, are you effectively managing expectations rather than resolving harm?

One of the first steps we take in understanding a complaint, is to determine whether the issue is within EWON jurisdiction. We do not want to waste a community member's time when the issues would be

⁷ [Renewable Energy Infrastructure Impact Report - Energy & Water Ombudsman NSW](#)

⁸ [Independent reviews - Energy & Water Ombudsman NSW](#) Page 7

⁹ [Benchmarks for Industry-based Customer Dispute Resolution.](#)

more appropriately handled in a different forum. A large part of our role is to manage expectations of what we can and cannot do.

Our functions are conferred by the Minister - EWON was established as the approved dispute resolution scheme in NSW in 1998. The EWON Charter¹⁰ stipulates that we cannot consider a complaint that is about the content of Government policies, legislation, licences and codes. This includes government decisions such as the transition to renewables and declaration of REZs. Where a community member / landholder's complaint is about NSW government decisions, we provide information to the landholder about the relevant government decision and refer the landholder to their local MP, as their representative in government and the appropriate avenue for complaints about government decisions.

12. You stated complaints are largely about engagement failures – how many of these have been escalated as systemic failures to government?

We work to ensure industry and government are aware of our focus on systemic issues and we work with members to address systemic issues identified in our case work and community engagement. Our complaint data and outreach insights inform our policy work to influence industry change for the better. These are shared in quarterly EWON Insights reports, SpotlightOn reports and at our quarterly Renewable Energy Infrastructure Advisory Group meetings. Attendees at these meetings include EWON REI members, NSW Farmers, Clean Energy Council and NSW & Commonwealth Government Agencies including the AEIC, NSW DCCEEW, DPHI.

In our REI role we have made three policy submissions to government inquiries and reviews:

- This inquiry - Impact of Renewable Energy Zones (REZ) on rural and regional communities and industries in New South Wales
- NSW Transmission Planning Review
- Productivity Commission inquiry on net zero transformation.

In these submissions we called for actions to address the systemic issues we have identified i.e. the need for:

- clearer public information and consistent benchmarks for consultation at a community level;
- legally binding engagement standards that specify consultation timeframes;
- EWON REI members to promote internal and external dispute resolution;
- coordination of consultation and regional planning to better address community concerns;
- widening the definition of 'affected landholders' to include directly and indirectly impacted landholders (i.e. neighbours); and
- extending the public exhibition period of Environmental Impact Statements of state significant developments and infrastructure.

All of our submissions are available on our website.¹¹

13. What formal mechanisms ensure those systemic issues result in policy change rather than being noted and ignored?

Our reports and submissions referenced in the response to question 12 above utilise the formal mechanism to influence change. In addition, we have extensive engagement with government, industry, members and other stakeholders in which we influence and lead policy change.

¹⁰ [Charter - EWON.pdf](#) – Clause 5.1(g)

¹¹ EWON Policy [Submissions](#)

We regularly engage with government and industry stakeholders including:

- Regional councils
- MPs in REZ electorates
- Australian Energy Infrastructure Commission
- Centre for Property Acquisition
- NSW Department of Climate Change, Energy, the Environment and Water
- NSW Department of Planning, Housing & Infrastructure
- NSW Ombudsman
- Transport for NSW
- Clean Energy Council
- NSW Farmers
- Indigenous Energy Australia
- Regional Development Australia offices in Murray, New England/Northern Inland, Riverina and Orana.

We are also regularly invited to present at industry forums, workshops and conferences, which provide another important platform to influence and lead change. In our REI function we presented at the Energy Networks 26 conference, the Energy Consumers Australia Foresighting Forum, Energy Week 2025, the Australian Property Institute Public Property Conference and hosted a briefing at NSW Parliament House.

Our strong stakeholder networks and engagements play a key role in our work influencing and leading policy change to improve protections for consumers, landholders and community members.

14. (Question on notice) How many complaints have you referred to the Australian Energy Infrastructure Commissioner because it's out of your jurisdiction?

Since 1 December 2024 to 31 March 2026, we have referred 21 complaints to the Australian Energy Infrastructure Commission as the complaint has been about generation or storage developers that are currently not EWON members.

In these complaints we take note of the details of the complaint, provide independent information and let the community member / landholder know about other resources they can access to understand the planning or regulatory frameworks relevant to REI developments.

15. (Question on notice) How many neighbour complaints have you received?

From our complaints data to date, we have received 32 neighbour complaints. This is 42% of REI complaints to date. Of these 32 complaints, data indicated that 24 complaints have been from direct neighbours to projects and 8 complaints from near neighbours. This data is based on the community member / landholder identifying their proximity to projects. Whether a community member / landholder is a direct or near neighbour is not something we specifically ask and record in registering complaints. Some community members / landholders have said they 'live near a project' or identified themselves as 'neighbours' and we have therefore assessed them as direct or near neighbours.