



25 May 2026

Department of Climate Change, Energy, the Environment and Water and NSW Fair Trading

Via email: energyefficiency@dcceew.nsw.gov.au

Dear Team

Investigation into minimum energy efficiency rental standards – Consultation paper

Thank you for the opportunity to comment on this consultation paper.

The Energy & Water Ombudsman NSW (EWON) investigates and resolves complaints from customers of electricity and gas providers in NSW, and some water providers. Our comments are informed by our investigations into these complaints, and through our community outreach and stakeholder engagement activities.

EWON strongly supports the introduction of minimum energy efficiency rental standards in NSW.

Our complaints show that, for many renters, energy costs and living conditions are shaped by factors beyond their control. In our July to September 2024 EWON Insights¹ we highlighted that renters often report distinct challenges linked to their housing circumstances:

- **Higher energy costs are often linked to the condition of the property:** Renters have less control over the property fixtures or the structural conditions within their property that influence or increase energy use. This makes it difficult for customers to reduce consumption or address the underlying causes of high bills and is particularly an issue in rural and remote areas which face more extreme temperatures.
- **Issues with appliances driving energy use:** Energy-intensive or inefficient appliances—such as hot water systems, air-conditioning and heating, pool pumps or underfloor heating—can significantly increase electricity consumption. Faults within these appliances (for example, leaking hot water systems) can also lead to unexpectedly high bills.
- **Barriers to resolving problems due to tenancy arrangements:** Renters often need to coordinate with landlords or managing agents to address issues. This can delay or prevent issues being fixed. This often leads to renters continuing to incur energy debt whilst trying to resolve issues and then face additional hurdles in trying to seek redress.
- **Metering and billing issues associated with rental properties:** Complaints include estimated bills caused by inaccessible meters, as well as disputes in multi-dwelling properties where metering arrangements are unclear or shared, leading to concerns about being charged for another household's energy use.

¹ EWON Insights – [July to September 2024](#)



EWON's community outreach has engaged with customers throughout NSW, particularly in regional and remote communities, including First Nations communities where these same issues are even more prevalent.

Customers in these areas report very high energy bills driven by extreme temperatures, poor insulation and inefficient appliances, often requiring continuous heating or cooling to maintain basic comfort. These impacts are particularly heightened for tenants and those in Aboriginal and social housing, who have limited control over the condition of their homes and face ongoing energy affordability challenges.

EWON's experience indicates that existing energy market consumer protections are not always sufficient to address the underlying drivers of these complaints. While customers may receive support through payment plans or affordability programs, these measures do not resolve the root cause where high energy use is driven by the condition or configuration of the home.

Minimum energy efficiency standards will ensure rental properties provide a reasonable level of energy performance, have the potential to reduce energy costs that customers cannot reasonably control, support more sustainable resolution of complaints, reduce disputes linked to property condition, metering and appliances, and improve outcomes for customers experiencing financial stress.

If you would like to discuss this matter further, please contact Dr Rory Campbell, Manager Policy and Research, on (02) 8218 5266.

Yours sincerely

A handwritten signature in black ink that reads "Janine Young". The signature is written in a cursive, flowing style.

Janine Young
Ombudsman
Energy & Water Ombudsman NSW