ENERGY CONSUMERS AUSTRALIA

Future Appliance Regulations to Support the Gas Transition discussion paper

Submission to the ACT Government

DATE: 16/09/2026

Energy Consumers Australia is the national voice for household and small business energy consumers. We advocate for a fair, affordable, and reliable energy system that meets everyone's needs and leaves no one behind on the journey to net zero.

Feedback on Future Appliance Regulations to Support the Gas Transition

Energy Consumers Australia (ECA) welcomes the opportunity to respond to the ACT Government's Future Appliance Regulations to Support the Gas Transition discussion paper.

ECA welcomes the ACT Government's leadership in providing clear policy direction for the transition away from gas, including its commitment to phase out gas use by 2045. Clear government direction gives consumers, industry and energy-system planners greater certainty to make informed long-term decisions and reduces the risk that the costs of an unmanaged transition fall disproportionately on those least able to electrify.

Electrification not only reduces greenhouse gas emissions, assisting on the path towards net zero, but also provides significant benefits to consumers, with reductions in household and small business energy bills. ECA's research shows that electrification can deliver substantial savings for consumers. Our *Stepping Up* report found that, by 2030, the average annual difference in total energy costs, including transport, between a typical fossil-fuelled home and an all-electric home will be around $2,250 (with additional savings for those who invest in solar and batteries).[1]

The purchase and replacement of appliances are a key point at which consumers make long-term decisions about their future energy use. Gas appliances can remain in service for 10 to 20 years, meaning a gas appliance purchased today may keep a household or small business reliant on the gas network well into its decline. As the number of connected consumers falls and fixed network costs are recovered from a shrinking customer base, these appliances may become increasingly expensive to operate and risk becoming stranded before the end of their useful life. Providing information and support to consumers to navigate these long-term decisions is an important part of an equitable energy transition.

Appliance regulation is an important next step to support this transition. Consumers may continue to purchase gas appliances without clear information about their lifetime costs or the future of the network supplying them, which may leave them unexpectedly exposed to rising bills as the gas network winds down. ECA therefore supports stronger regulation of gas appliances, as part of a coordinated framework that gives consumers adequate information, time and support to electrify.

The ACT is well-placed to lead the transition away from gas

The ACT Government has already played a leading role in the energy transition through clear jurisdictional policy and planning for the future of the gas network in the ACT. ECA's consumer research has found that ACT households are more engaged with electrification than households nationally, with 55% having

[1] ECA, *Power Move: Fair and affordable electrification for Australian households and small businesses*, 2026, p. 6; ECA, *Stepping Up: A smoother pathway to decarbonising homes*, August 2023.

considered converting their homes to fully electric, compared with 35% nationally.[2] Consumers in the ACT are also more likely to report feeling more confident about the energy transition.[3] ECA research also finds that around two-thirds of ACT homeowners with gas expect to disconnect from the gas network within the next decade, almost twice as high as the national average.[4] This is consistent with the value of clear policy direction: when consumers understand where the energy system is heading, they are better placed to plan for appliance replacement and other long-term household investments.

As of June 2023, 79.4% of households in the ACT had mains gas connections, more than any other state or territory in Australia, with average usage being the second highest, only behind Victoria.[5] While the number of households using gas in the ACT is now declining,[6] many consumers in the ACT continue to use gas, making the need for a well-planned transition particularly important in this jurisdiction. Effective appliance regulation is an important part of supporting consumers through the transition, and this consultation is an opportunity for the ACT Government to set a leading example that will also be a useful precedent for other jurisdictions in future as gas demand declines.

Effective regulation is needed for an equitable, consumer-focused transition

As outlined in our *Power Move* report, ECA supports policies that makes it unequivocally clear to consumers that the future is all-electric, particularly at key decision points, such as appliance replacement.

While electrification can deliver significant benefits for households and small businesses, access to those benefits is unevenly distributed. Consumers facing greater barriers to electrification, including renters, apartment-dwellers, low-income households and small businesses, often have significantly less capacity to access these benefits. Renters and people living in multi-unit buildings can have limited or no control over changes to their premises because of landlord and strata arrangements, while low-income households may be unable to meet upfront appliance and electrical upgrade costs. Small businesses can face additional capital, leasing and operational constraints, compounded by a lack of sector-specific advice, commercial showrooms and local demonstration sites.

Effective appliance regulation is necessary to prevent consumers from becoming further locked into a declining gas network while recognising that consumers have different capacities to electrify. Regulation should prioritise intervention at points where the transition is least disruptive, including new construction and the natural end of an appliance's useful life; provide consumers with clear and comparable information at the point of purchase; and be accompanied by targeted financial and practical support for those facing greater barriers. ECA supports minimum energy efficiency standards in all rental properties, recognising the detriment to people's physical, mental and financial wellbeing of living in an uncomfortable home that is impossible to keep warm in winter, cool in summer, and overly expensive to live in.

We welcome the ACT Government's leadership on this issue and trust it will take this important opportunity to demonstrating a nation-leading approach to effectively supporting consumers through the transition.

Thank you for considering this submission. If you have any questions, please contact Justin Whelan at justin.whelan@energyconsumersaustralia.com.au.

[2] ECA, *Stepping Up: A smoother pathway to decarbonising homes*, August 2023, p. 7.
[3] ECA, *Power Move: Fair and affordable electrification for Australian households and small businesses*, 2026, p. 47.
[4] Ibid.
[5] Energy Networks Australia, The role of Australia's gas distribution networks, 2024, 2.
[6] AER, Gas quarterly disconnection reporting (August 2026).

Responses to the consultation questions

Our responses to the questions from the consultation paper follow.

What are the reasons for regulation? (Chapter 1)

1. Which factors (consumer protection, an uneven transition, reducing emissions and/or providing regulatory certainty) do you think should be prioritised in the gas transition? Are there other factors which should be considered?

2. Do you think any factors (consumer protection, an uneven transition, reducing emissions and/or providing regulatory certainty) are sufficiently addressed by current action? If so, please provide details.

The primary factor to prioritise in the gas transition is consumer protection. As the consultation paper notes, both the risk of stranding consumer assets and the potential significant cost increases for consumers left on the gas network are important to mitigate. The risk of an uneven transition, and achieving regulatory uncertainty, should also be evaluated through the lens of effective consumer protection.

Avoiding an uneven transition that leaves vulnerable consumers behind is in practice an approach to protect those vulnerable consumers. Providing greater regulatory certainty to the variety of actors in the gas appliance (and gas delivery) supply chain helps ultimately reduce costs to – and thus helps to protect – those consumers reliant on that supply chain.

ECA acknowledges the value that electrification, as part of the gas transition, can have in reducing emissions. However, transportation emissions are much more significant source of emissions from households than gas appliances. More generally, in the broader exercise of emission reduction, household emissions from some small consumer appliances, such as cooking and hot water, are not primary drivers of Australia's overall emissions profile. Regardless, emission reductions from household electrification are particularly cost-effective, and so in the broader context of reducing emissions cost-effectively, household and small business electrification plays a singular role.

ECA applauds the ACT Government for leading in providing regulatory certainty for Australia's transition away from gas. This clearer policy direction is reflected in the 55% of ACT households having considered converting their homes to fully electric, compared with a national average of just 35%.[7] However, further action is needed to protect consumers and ensure the costs of the transition do not fall unfairly on those least able to afford them. Appliance regulation is an important part of the broader strategic framework needed to provide certainty and protection for households and small businesses throughout the transition.

[7] ECA, *Stepping Up: A smoother pathway to decarbonising homes*, August 2023, p. 7.

Which gas users could regulations support to transition? (Chapter 2)

3. Is there a particular category of gas user (Residential, Commercial or Industrial) that should be the focus of regulation?

4. How do you think regulation can support groups who face complex barriers to electrify (such as renters, small businesses, and people living in multi-unit apartments)?

Electrification of gas use by 'small' consumers (households and small businesses) provides significant benefits, offering a comparatively low-cost pathway to emissions reduction, given that it also delivers net economic benefits to households and small business. Accordingly, we believe that residential and small business gas consumers should be the primary focus of the regulation.

Industrial users – and some large commercial users – especially those that rely on Type B gas appliances, typically face greater barriers to transitioning away from gas, while those remaining on a declining gas distribution network are likely to face rising network costs. However, there are also emerging opportunities that may be of use for particularly hard to electrify industrial users, such as renewable hydrogen and biomethane, both of which are not suitable for other use cases (like households), due to high expenses, poor efficiencies, and safety concerns, and heavily limited production capabilities.

Ensuring that new buildings are all-electric will ensure that future rental stock is healthier and more affordable (noting the ACT has already implemented requirements of this kind), while minimum rental standards requiring gas appliances to be replaced with efficient electric alternatives at end of life can support renters in existing homes.

As noted in the discussion paper, landlords are consistently less likely than owner-occupiers to indicate an intention to disconnect properties from gas. This demonstrates that information and incentives for landlords alone are unlikely to drive electrification at the pace required. Government regulation is appropriate to address market failures such as this. Minimum rental standards therefore have an important role in ensuring renters are not left using increasingly expensive gas appliances they did not choose and cannot replace. ECA supports minimum energy efficiency standards in all rental properties, recognising the detriment to people's physical, mental and financial wellbeing of living in an uncomfortable home that is impossible to keep warm in winter, cool in summer, and overly expensive to live in. Expanding the ACT's existing standards should be a priority to give people relief from high energy bills and ensure that all rental homes are healthy to live in.

ECA supports minimum energy efficiency rental standards in the ACT that:

- Are performance-based from a declared date, with immediate 'no regrets' features to support electrification and energy efficiency;
- Include social and community housing; and
- Include protections for tenants from unjustified rent increases, compliance burden and increased risk of evictions.

Coordinated planning, landlord participation, targeted financial support and access to clear, trusted and reputable information will also be needed, particularly for low-income households. For people living in multi-unit buildings, reforms to strata arrangements should reduce structural and administrative barriers to electrification, supported by training and resources for strata and property managers. For small

businesses, clear and tailored communications, along with material support such as tax incentives with no end date and low-interest loans, will be essential to supporting electrification.

Which appliances could be included in future regulation? (Chapter 3)

5. Should regulation focus only on small appliances that are mostly used by the residential and small business sectors (Type-A appliances), or should large commercial appliances also be considered (Type-B appliances)?

6. Are there particular appliance uses, such as space heating, water heating or cooking, which should be the focus of regulation?

7. Are there any appliance uses, such as space heating, water heating or cooking, which should not be considered for regulation?

The ACT needs a plan to help all gas consumers transition, including with regards to their appliance use and ownership. Given ECA's focus on household and small business consumers, we would prioritise these consumers. Regardless, the types of interventions are likely to vary somewhat significantly based on whether a consumer is residential, commercial or industrial, due to appliance specifications, the appliance and installation supply chain, and building specific issues.

All three major household gas appliances – space heating, water heating, and cooking – should be within the scope of regulation, to ensure consumers are able to make well-informed choices about the appliances they purchase and operate. All three appliance types have relatively long expected lives, all are likely purchased by the property owner (a landlord or owner-occupier, but not a renter), and all have more similarities than differences in the supply chain.

All three appliance types should be regulated in the ACT. If they are not, consumers will suffer – through greater costs of time and money and frustration – down the road when parts of the network are decommissioned. Excluding any of these appliance types would not fundamentally alter the ACT's network phaseout trajectory, and so would not materially change consumer circumstances, or the need for the greater consumer protections that effective regulations can provide.

Approaches to regulation (Chapter 4)

8. Which regulatory approaches (restrictions on new/replacement gas appliances, rental standards, information at point of sale etc.), if any, would you support to meet the next steps in the gas transition?

9. Do you think a particular regulatory approach should be prioritised over another?

10. Are there any specific regulatory approaches that you have concerns with? What actions could help minimise these concerns?

All of the regulatory approaches outlined in the consultation paper have a role to play. They are largely complementary to one another, and we would encourage the ACT government to consider and likely use nearly all of them.

Information provision at the point of sale and via tradespeople at the point of appliance work, is a low-cost and relatively no regrets approach. While the ACT is further advanced on its approach to the future of gas, ECA thinks there is significant merit in information at the point of sale and appliance work nationally, and early steps by the ACT can help accelerate similar measures in other jurisdictions.

Mandating or otherwise encouraging transition planning is likewise a relatively low-cost, no regrets approach. Ideally, households and small businesses would be thinking about electrifying appliances before the time of replacement or repair work, and so any additional measures the ACT government can take to promote early planning by these consumers should be explored.

ECA considers requiring gas appliances to be replaced with efficient electric alternatives at end of life, alongside planning and building controls requiring new premises to be all-electric, to be among the strongest regulatory approaches to supporting electrification. ECA also supports complementary measures including clear and comparable information at the point of sale, minimum rental standards incorporating all-electric appliances, mandatory disclosure of home energy performance, and minimum performance standards for appliances. These measures should be accompanied by practical and financial support for consumers and landlords, including funding, streamlined regulation, strata reform, and training and resources for tradespeople and property managers.

Regulating standards for rental properties is an essential piece of the puzzle. Given renters lack of agency in choosing their appliances and the risks they face in the transition, it is essential that all gas appliances in rental units are replaced by electric alternatives at the point of failure. Updated rental standards disallowing new gas appliance installs and requiring electric at point of appliance failure, consistent with those coming into effect in Victoria from March 2027, are essential as soon as possible.

The ACT government should also consider complementary measures that provide clearer pathways for consumers who have largely or completely electrified their homes or business. As the ACT progresses towards its commitment to phase out gas by 2045, increasing numbers of households and small businesses have already and will likely stop using gas before the network is formally withdrawn from their area. For many consumers, appliance replacement will be the first step in exiting gas, but the implication of retaining, disconnecting or permanently abolishing a gas connection may not be well understood. Consumers can face confusion about the differences between retail contract termination, disconnection and abolishment, including the costs, responsibilities and future implications associated with each option.

Consumers considering abolishment should have access to clear information about future network decommissioning plans to inform their decision. Where coordinated withdrawal of the gas network is

anticipated, there is a risk that individual consumers incur abolishment costs that ultimately duplicate work that would have occurred as part of broader network retirement.

The ACT Government should therefore ensure that appliance transition policies are supported by clear, accessible and neutral information about gas exit pathways. Consumers should understand the practical and financial implications of their options and how those options fit within the ACT's broader transition away from gas. As gas demand declines, governments will also need to consider how dormant connections, residual safety obligations and eventual network decommissioning are managed through coordinated transition planning rather than relying solely on individual consumer decisions.

ECA believes that the regulatory approaches outlined above are complementary and, together, would provide a robust framework for the transition.

Appliance regulation should be implemented with sufficient notice and support for consumers to avoid impose disproportionate costs and practical burdens on consumers who face greater barriers to electrification, including low-income households, renters, apartment-dwellers, and some small businesses.

These risks should be mitigated through realistic transition timelines, targeted financial and practical support, and measures addressing structural barriers such as rental and strata arrangements. Governments, including the ACT Government, should also remove or prohibit rebates, incentives, and subsidies for the purchase of new gas appliances, whether offered by government or gas networks, as these send consumers mixed signals about the transition and risk further locking consumers into a declining gas network.

Timeframes for regulation (Chapter 5)

11. What factors influence the time it takes to replace gas appliances with electric, rather than like-for-like appliance replacement? How much time would this generally be expected to add?

12. Are there other approaches you would like considered for regulating appliances which might support the next steps in the gas transition?

13. What timeframe do you consider to be appropriate for regulations to come into effect?

14. If restrictions on installing certain types of gas appliances were implemented, should the regulations be phased in over time (such as hot water appliances from X date, and space heating from Y), or should regulations be commenced at once?

Replacing gas appliances with electric alternatives can take longer where consumers face additional technical, financial, or administrative barriers. Consumers can incur significant upfront costs to electrify, including appliance purchase and installation, gas disconnection or abolishment, and potentially rewiring or switchboard upgrades needed to accommodate increased electrical load. Administrative hurdles and split incentives in strata arrangements and leased residential and small-business premises can further delay electrification, while leaving apartment dwellers, renters, and other consumers with limited agency tied to a declining gas network and rising costs. There is also substantial 'hidden labour' associated with electrification, requiring consumers to research and compare options, understand available rebates, identify suitable tradespeople, and coordinate installations; this burden can be especially prohibitive for

households already experiencing vulnerability. A lack of independent advisory services, commercial showrooms, and local demonstration sites can further slow the transition, particularly for small businesses.

The ACT Government taking the lead on the transition is important. As well as supporting consumers in the ACT, action taken now can send a signal to other state and territory jurisdictions, as well as the Commonwealth, about where further action is needed, including stronger appliance efficiency standards, product labelling, safety requirements, and coordinated consumer-protection measures.

In addition to direct restrictions on gas appliances, ECA supports mandatory, standardised labelling that allows consumers to directly compare the lifetime energy costs and emissions impacts of gas and electric appliances, including warnings about the risk of gas appliances becoming stranded or increasingly expensive to operate. Complementary approaches should also include strengthening minimum appliance performance standards and ensuring tradespeople and other trusted intermediaries are equipped to provide consumers with clear and consistent information at key appliance-replacement decisions.

ECA recommends that regulatory timeframes should be ambitious yet achievable. Providing clear direction and timelines helps consumers understand, plan for, and navigate the transition. Nationally, ECA has recommended that all new household and small commercial buildings be all-electric by 2028, all existing social and community housing by 2035, all rental homes by 2040, and all homes by 2050. We recognise and welcome that the ACT Government has even more ambitious targets than this.

Regulatory measures should commence as soon as is feasibly possible, while allowing sufficient time for high-quality regulation, meaningful community consultation, and appropriate consumer support. We applaud the ACT Government for committing to phase out fossil gas use by 2045 and support bringing forward complementary regulatory milestones that help achieve this objective.

ECA supports, in principle, a coordinated and staged transition, particularly one centred on natural appliance failure or replacement as a key intervention point. This better reflects what we have heard from consumers, who are frequently reluctant to replace functional appliances before the end of their useful life. We would support restrictions on the installation of gas cooking appliances being phased in after restrictions on space and water heating appliances. This approach is consistent with the cost-benefit analysis undertaken by the Victorian Government, as well as the comparatively low gas consumption of cooking appliances relative to space and water heating.

According to AEMC data, annual household gas use in the NEM for a three-person house with a three-star energy rating is approximately 1,600 MJ for cooking, compared with 12,200 MJ for water heating and 24,800 MJ for space heating, [8] despite cooking being the most common use of gas among households with gas connections.[9] Cooking is also more closely associated with behavioural preferences. These preferences should be recognised through government programs combining technical and financial support with clear information, training, and consumer education, and further support a later commencement date for restrictions on gas cooking appliances.

[8] AEMC, The energy revolution in our homes | AEMC, 2025; ECA, *Power Move: Fair and affordable electrification for Australian households and small businesses*, 2026, p. 13.
[9] ECA, *Power Move: Fair and affordable electrification for Australian households and small businesses*, 2026, p. 13; ECA, *How households use gas and their attitudes towards electrification*, January 2025, p. 5.

Future gas network decommissioning (Chapter 6)

15. What information would you find most helpful if your property was in a section of the gas network that was to be decommissioned?

16. How long would you consider to be a reasonable period to make any necessary arrangements after being notified that the gas network service will be withdrawn in your area?

17. What is a reasonable period that must pass before a disconnected gas connection, can no longer be reconnected / reinstated (e.g. 2, 3 or 5 years of no use).

Consumers need clear advice and support about decommissioning plans in order to make informed decisions about their future energy needs.

The sudden, uncoordinated withdrawal of reticulated gas services by Solstice Energy across 10 regional Victorian towns provides a stark case study of what happens when network decommissioning occurs without a structured regulatory framework. In August 2025, over 1,000 customers were given as little as 7 to 16 months' notice that their gas supply would cease. The resulting confusion, severe financial stress, and inadequate support illustrate why clear rules are needed.[10] To ensure a smooth transition, the ACT Government should directly engage with the logistical and community-engagement lessons (and failures) from this smaller-scale withdrawal in regional Victoria, as well as other instances of network withdrawal (e.g. in Esperance and Albany, WA).

We consider that households and small businesses facing gas network decommissioning need clear, timely, and actionable information to make safe and affordable transitions. The most helpful information would include:

- A clear statement of the proposed decommissioning date(s), along with the geographic boundaries of the affected section(s) of network.
- An explanation of the difference between temporary disconnection, permanent disconnection, and full abolishment (including what happens to the meter, service pipe, and street main).
- Expected timeframes for each step (notice, final connection date, abolishment works) and who is responsible for paying for each element.
- Guidance on electrification options and costs, including eligibility for rebates, interest-free loans, or other transition support.
- Safety information about gas isolation, electricity reliability impacts, strata or tenancy arrangements, and any implications for life-support or medical equipment.
- A single point of contact for support and queries, with clear complaints and escalation pathways, plus plain-language FAQs and translated materials where needed.

On timing, consumers should be given as much notice as practicable, particularly where households and businesses in the area to be decommissioned may face practical barriers to electrification. At minimum, a

[10] Life Course Centre, *Customer Impacts of the Withdrawal of the Gas Service in Gippsland*, December 2025.

reasonable period to make necessary arrangements after notification should be no less than five years for residential and small-business customers.

Household and small businesses may need adequate time to:

- Plan and finance appliance replacement
- Navigate strata approvals, landlord-tenant negotiations and/or body corporate processes
- Access and install electrification upgrades alongside electrical switchboard or wiring works where needed (which may have an impact on demand for electrical trades)
- Time replacements to coincide with end-of-life appliances to avoid stranded assets

The Grattan Institute's report Out of Gas recommends at least five years' notice of disconnection and that networks publish planned decommissioning dates for all customers, while noting that in March 2026, Germany introduced new rules requiring networks to give customers 10 years' notice of gas decommissioning.[11]

This creates an opportunity for the ACT Government to demonstrate how to undertake gas network withdrawal well, through early, strategic and tailored engagement that reflects how Canberrans live, work and access services. Done well, this approach can ensure no household or small business is disrupted without sufficient notice, information and support to transition safely and equitably.

Other considerations for gas appliance regulation (Chapter 7)

18. Are there particular circumstances which would warrant an exemption/s from gas appliance regulations?
What would the impact be of those exemptions not being allowed?
19. Are there any other considerations you believe are important to informing potential gas appliance regulations?

Exemptions should only be available in exceptional circumstances, as broad or poorly defined exemptions risk creating loopholes that undermine electrification objectives and prolong gas lock-in. Any exemptions should be subject to clear eligibility criteria and, where practicable, conditions that preserve future electrification-readiness, such as sufficient electrical capacity, capped gas outlets, three-phase power, and space for technologies such as heat pumps.

Circumstances warranting consideration for an exemption could include genuine physical constraints in older multi-unit buildings, heritage restrictions, disability, infirmity or other individual circumstances, and specialised equipment or operationally complex commercial uses where electrification may be technically difficult or viable alternatives are not yet readily available.[12] Exemptions should be narrowly targeted and regularly reviewed as technologies and market conditions change.

Gas appliance regulation should be considered as one component of the broader energy transition, rather than in isolation. This includes reform of the gas network regulatory framework and strategic planning for

[11] Grattan Institute, Out of Gas: Managing the decline of gas in Australia, August 2026, p.42.
[12] ECA, *Power Move: Fair and affordable electrification for Australian households and small businesses*, 2026, pp. 22–26. 2

network decommissioning. Continued unnecessary or long-lived expenditure on a declining gas network increases stranded-asset risks and the costs ultimately recovered from consumers, while accelerated depreciation can bring these costs forward and increase bills for today's consumers without necessarily materially reducing stranding risk. ECA supports minimising unnecessary expenditure and more equitably sharing the costs and risks of network decline between consumers, networks and their investors, and governments. As electrification progresses, a piecemeal approach to disconnection and abolishment is also unlikely to be the most efficient way to manage network decline over the long term. Coordinated decommissioning of sections of the network can reduce costs and allow consumer communications, financial assistance and electrification works to be planned more effectively.

Electrification should also be coordinated with improvements to building energy performance and planning for electricity-system impacts. Efficient electric appliances can substantially reduce household energy consumption and bills, with these benefits further increased through measures such as insulation, draught-proofing and other energy-efficiency upgrades. While electrification will increase electricity consumption and, particularly through space heating in the ACT, may increase winter peak demand and require additional network investment, this should not be treated as a reason to delay the transition. Greater utilisation of existing electricity infrastructure can reduce per-unit network costs, and ECA-commissioned modelling indicates that these shared benefits can outweigh incremental network investment costs. Demand flexibility, energy efficiency and CER, including rooftop solar and batteries, can further assist in managing these impacts.

The interaction between electrification and existing consumer protections should also be considered. Electrification can substantially change a small business's electricity consumption profile and may push some businesses above regulatory thresholds determining access to small-customer protections, tailored tariffs and ombudsman services. ECA's Canberra small business case study found that one business expected its electricity consumption to increase from around 35 MWh to 90 MWh following electrification, bringing it close to the ACT's 100 MWh small-customer threshold.[13] Appliance regulation should therefore be designed so that small businesses are not inadvertently disadvantaged, or lose important consumer protections, as a consequence of electrifying.

[13] ECA, *Power Move: Fair and affordable electrification for Australian households and small businesses*, 2026, p. 26.

The national voice for residential and small business energy consumers

PO Box A989,
Sydney South NSW 1235
T 02 9220 5500

energyconsumersaustralia.com.au