

The Energy Users' Association of Australia (EUAA) is the peak body representing Australian commercial and industrial energy users. Our membership covers a broad cross section of the Australian economy including significant retail, manufacturing, building materials and food processing industries. Combined our members employ over 1 million Australians, pay billions in energy bills every year and in many cases are exposed to the fluctuations and challenges of international trade.

The EUAA is a strong supporter of the Energy Charter. We congratulate the signatories to the Energy Charter who are showing leadership by publicly stating their intention to shift their business and put the customer at the centre of their operations.

We thank the Independent Accountability Panel for their work in assessing and reviewing the disclosures made by Energy Charter signatories.

Industry disclosures are an important opportunity to review the progress of the signatories and overall, we have been impressed by the quality of consultation and engagement that has been demonstrated in this year's disclosures. Our personal experience at the EUAA mirrors this with an increased interest in engagement from energy businesses and an uptick in the quality of that engagement.

The format of the disclosures this year was better than in previous years, but it could be improved further to aid in comparison and to see 'at a glance' progress that has been made. Formats such as tables and use of traffic light systems that indicate if initiatives are underway or yet to be begun are useful for readers and significantly aids in quickly understanding where a business is at in relation to the initiatives. We would encourage this format be adopted by more signatories in future years. It is pleasing to see an ongoing progression in the way signatories are working with customers and in trying to improve outcomes for customers.

We would like to acknowledge some great initiatives that have come out of the Energy Charter. In particular, we want to highlight the National Customer Code, a Better Together Initiative of the Energy Charter, just one of these initiatives.

An EUAA representative participated in the design and establishment of the Code along with consultants, brokers and retailers. The outcome is a Code that will be an important tool to increase energy literacy, transparency and build trust between customers and brokers, retailers and consultants. We welcome the establishment of this Code, we thank all the businesses who have participated in its design and supported its implementation. This is an important practical outcome of the Energy Charter and we look forward to seeing more initiatives like this come to fruition.

We welcome the IAP's focus on Net Zero and Energy Costs this year.

These two issues are front and centre of the work undertaken by the EUAA and we note that the transition in energy markets is already seeing significant costs being proposed, such as those of the Integrated System Plan (ISP).

Rewiring our grid is a critical component of how we will integrate increasing volumes of renewable energy and reduce emissions, however the EUAA remains concerned about how the costs of this huge network expansion will be distributed. Equally, we are particularly concerned about gas pipeline stranded asset risk for consumers.

We seek leadership from the energy industry on developing a more equitable cost and risk sharing framework to ensure the burden of the transition to net zero does not fall entirely on the shoulders of energy users.

We would like to see a fair contribution to these long lived assets, including from governments and renewable energy proponents, to ensure that consumers are not over burdened with all the costs and risks of these new assets. Simply shifting the costs on bills from the electrons to fixed assets is not in the long term interests of consumers.

More generally, we need a more coordinated approach across the entire energy industry and with governments if we are going to see a least cost outcome delivered in consumers' best interests.

Thank you for the opportunity to make this submission. Do not hesitate to be in contact should you have any questions.

Kind regards,



Emily Wood
Communications Manager.