

8 December 2023

Transport and Resources Committee
Parliament House
George Street
Brisbane Qld 4000

By email: trc@parliament.qld.gov.au

Dear Committee Secretary

Energy (Renewable Transformation and Jobs) Bill 2023 ('the Bill')

Thank you for the opportunity to provide feedback in relation to the above.

About QCOSS

The Queensland Council of Social Service (QCOSS) is the peak body for the social service sector in Queensland. Our vision is to achieve equality, opportunity, and wellbeing for every person, in every community.

QCOSS' position

We welcome the 2022 Queensland Energy and Jobs Plan ('the Plan') in transitioning the state's energy system to a low-carbon base, offering cleaner and more affordable energy for Queenslanders. We support the Bill in legislating renewable energy targets and other key commitments of the Plan.

The development of this submission is based on consultation with QCOSS member organisations. This includes QCOSS' long-standing Essential Services Consultative Group (ESCG). Membership of the ESCG consists of community organisations that seek to ensure energy consumer needs are better represented in policy, regulatory and industry decision-making. We have also held one-on-one discussions with community organisations to seek their specific feedback on the Bill.

QCOSS is a member of the [Power Together Alliance](#)¹ that seeks to ensure that no Queenslanders are left behind in the energy transformation towards a cleaner energy future. We urge the government to include details in the Bill that support this policy platform proposing solutions in four key areas:

1. Increase large-scale renewable energy generation in Queensland to reduce electricity prices and emissions simultaneously.
2. Allow every household to benefit from solar energy, including renters and those in social housing.
3. Bring Queensland's rental housing stock up to scratch with minimum energy efficiency standards.
4. Increase community resilience by providing financial support for community organisations.

Our response to the Bill is focused on ensuring an equitable energy transition.

¹ Power Together Alliance. (2023). Power Together Policy Platform. Queensland: Power Together. https://powertogether.org.au/about-power-together/2023policy_asks/



Equitable access to the energy transition

We support the Queensland Government in legislating the renewable energy targets at 70 per cent by 2032 and 80 per cent by 2035. This is an improvement on a 50 per cent target by 2030.

It is important the benefits of the renewable energy transition are shared with all Queenslanders. However, low-income households are currently more likely to experience energy vulnerability and disadvantage. Low-income households spend double the amount of their disposable income on energy than middle-income households.² This is partly attributed to Queensland renters being more likely to live in homes with poor energy efficiency.³

According to QCOSS cost-of-living research, the number of Queensland households in debt to their energy retailer has been increasing, with the number of customers entering hardship programs remaining high.⁴ QCOSS member organisations have highlighted a rising vulnerability to energy hardship amongst people on lower incomes, culturally and linguistically diverse (CALD) communities, seniors, people with a disability, social and community housing residents, renters and Aboriginal and Torres Strait Islander peoples.

It is essential that in legislating the transition to clean and affordable energy, effective community programs and consumer advocacy are implemented. This requires targeted measures and strategies that support all consumers to access new energy technologies to ensure an equitable distribution of benefits.

Major barriers that reduce the likelihood of low-income households accessing solar PV relate to cost, and housing tenure. Research indicates that programs that include financial incentives for landlords can lead to energy efficiency gains for renters and reduce energy hardship.⁵ For example, the former Solar for Renters Trial enabled landlords and tenants in regional areas of Queensland, including Bundaberg, Gladstone, and Townsville to share the cost of installing solar systems.⁶

Public ownership dividends

The Queensland Government notes the importance of retaining public ownership of the energy system. We commend the record investment in renewable energy in the recent financial year. Proceeds from public ownership, dividends or tax revenue should be redistributed as a means of providing targeted and automatic bill relief, benefits and resilience measures to low-income consumers. In 2022, the QCOSS [Living Affordability in Queensland](#) report⁷ explored the accessibility of cost of living supports, such as rebates and concessions, and outlined how bill relief measures should be made more accessible, as well as where barriers and gaps can be addressed.

In facilitating benefit sharing, consideration should be given to appropriate financial innovation, such as micro-finance and no interest loans, to subsidise energy efficiency improvements for low-income households. Other examples include accessible insurance options paired with resilience education, or utilising green and social-oriented financial market instruments to attract funds for energy hardship mitigation.

The development of pooled community benefits and/or offset funds to improve local social and environmental outcomes could be considered in coordination with proposed reforms for the Environment Protection and Biodiversity Conservation Amendment (Standards and Assurance) Bill 2021. Various versions of these initiatives and programs have been implemented in piecemeal

² Australian Energy Regulator. (2021a). Annual retail markets report 2020-2021. Canberra: Commonwealth of Australia. <https://www.aer.gov.au/system/files/Annual%20Retail%20Markets%20Report%202020-21.pdf>

³ Consumer Policy Research Centre. (2020). Exploring regulatory Approaches to Consumer Vulnerability: A Report for the AER. Canberra: Consumer Policy Research Centre.

⁴ Queensland Council of Social Service. (2023). Living Affordability in Queensland. Brisbane: QCOSS.

⁵ Bird, S., and Hernández, D. (2012). Policy options for the split incentive: Increasing energy efficiency for low-income renters. *Energy Policy*, 48: 506-514.

⁶ Queensland Government. (2019). Solar for Renters Trial. Brisbane: Queensland Government - Department of Energy and Public Works. <https://www.epw.qld.gov.au/about/initiatives/solar-rentals-trial>

⁷ Queensland Council of Social Service. (2022). Living Affordability in Queensland. Brisbane: QCOSS. <https://www.qcoss.org.au/publication/report-living-affordability-in-queensland-2022/>

ways, we recommend cohesive ongoing programs for creating long term impact, backed by the benefits of public ownership.

Governance and advisory functions

Regarding the governance functions of a publicly owned energy system, it is important for the Queensland Government to consider recruiting skills broader than the energy industry, such as environmental assessment, regional advocacy, business development and the community sector.

We welcome the inclusion of a consumer advocate as part of the Queensland Energy System Advisory Board and recommend this role be filled by someone with skills in client advocacy, such as a financial counsellor or financial resilience worker. Their knowledge and expertise should include familiarity with referral pathways and social supports that assist those entering energy hardship across Queensland, including people in regional and remote areas.

There is currently limited information regarding the Queensland Renewable Energy Jobs Advocate. More detail is needed on how this position would work with other structures, such as local chambers of commerce and training centres including the Future Energy Workforce Roadmap.

Increased transparency and engagement with the community is important. The stakeholder reference groups outlined in the Local Energy Partnerships Initiative should be integrated into the design process with decision making powers. This should allow a co-design process within each Renewable Energy Zone (REZ), with clear responsibility and influence granted to advisory bodies and local groups.

Job Security Guarantee to be supported by sufficient community services

We are supportive of the Job Security Guarantee as a measure for an equitable transition. However, we recommend that community services are funded to work effectively with the Jobs Advocate and ensure there are sufficient supports for communities and individuals transitioning workplaces.

We appreciate that a jobs guarantee and partnership⁸ of this kind is new. We recommend opportunities for scenario investigations to be available for troubleshooting issues, as well as further research into previous⁹ job guarantee initiatives to understand how it could be practically implemented.

Ensuring social license in Renewable Energy Zones

In engaging with communities, we urge the Queensland Government to maximise local opportunities and manage impacts from REZ infrastructure. This must include provisions and related frameworks that effectively enable social license in building renewable developments, taking into consideration the social impacts on communities, cultural heritage, and the environment. This involves minimising these impacts and working towards shared value outcomes, as well as providing sufficient social infrastructure. This must be informed by the needs of the communities and Traditional Owners in each region, with consultation periods that allow sufficient time for communities to respond.

Community engagement could be led by the reference groups proposed in the Queensland Regional Energy Transformation Partnerships Framework. However, these groups must be resourced and empowered to conduct stakeholder engagement in their region. QCOS support a

⁸ As outlined by the Energy Workers' Charter

⁹ Quirk, V. (2009). The Queensland Unemployed Workers Bill of 1919. Centre of Full Employment and Equity, University of Newcastle. <http://www.fullemployment.net/wp.php>

Quirk, V. (2018). The light on the hill and 'right to work'. Economic and Labour Relations Review Vol. 29, Issue 4, p. 459-480 <https://www.cambridge.org/core/journals/the-economic-and-labour-relations-review/article/abs/light-on-the-hill-and-the-right-to-work/3416AD2630958F24A0AC710CEBBE9D2F>

social license approach¹⁰ in building infrastructure projects in a way that positively impacts landholders and their communities.

We urge the government to ensure that the REZ readiness frameworks/assessments are available to communities to provide the leadership and direction that is needed to achieve the best outcomes. This information is ideally made available before developments occur so that local communities are provided with more clarity.

We support the Queensland Council of Conservation's recommendations for the following information and engagement to be included:

- The review of the planning framework as promised in the Queensland Energy and Jobs Plan.
- Land-use, biodiversity and cultural heritage mapping, which is ground-truthed, that guides the Renewable Energy Zone development and shows renewable energy developers where to build projects.
- An accountability mechanism to ensure that any project delivered or backed by a government-owned corporation genuinely delivers on the Regional Energy Transformation Partnerships Framework principles to empower communities, build local industry and protect nature, in advance of applying this condition to all projects in Renewable Energy Zones.
- Community reference groups that are empowered to provide advice on development of projects and strategically allocate funds to deliver long term benefits.
- A framework developed with local community reference and conservation groups to identify and implement initiatives that improve biodiversity in the regions hosting renewable energy projects.

One opportunity for improving public consultation is to implement Community Power Hubs as a one-stop-shop embedded in communities to deliver advice on the energy system and transitioning opportunities. Community power hubs should feature information in different languages and in accessible formats to help all Queenslanders. We also recommend that community power hubs provide a free household energy auditing service for low-income households to provide tailored advice on how to improve energy efficiency at home. Provision of direct sustainable funding into existing community-based organisations across Queensland, such as neighbourhood centres, would be one strategy to enhance resilience and community connectedness in regions that may be subject to changes as a REZ.

Conclusion

QCOSS supports the Bill in enshrining key commitments of the Plan into law and building a framework to support renewable energy targets. Energy is an essential service, and it is important the benefits of the energy transition are shared with all Queenslanders.

Thank you again for the opportunity to provide our submission. If you have any questions, please contact Aimee McVeigh, Chief Executive Officer at aimee@qcross.org.au.

Yours sincerely



Aimee McVeigh
Chief Executive Officer

¹⁰ Energy Charter. (2023). Better Practice Social License Guideline. Australia: Energy Charter.

<https://www.theenergycharter.com.au/better-practice-social-licence-guideline/>

Re-Alliance. (2019). A Guide to Benefit Sharing Options for Renewable Energy Projects. Australia: Re-Alliance.

<https://www.re-alliance.org.au/benefitsharing>

First Nations Clean Energy Network. (2023). First Nations Better Practice Community Engagement Toolkit. Australia.

https://www.firstnationscleanenergy.org.au/first_nations_better_practice_community_engagement_toolkit