

29 April 2026

To whom it may concern,

2026 Evidence Platform Issues Paper

Thank you for the opportunity to provide a response to the 2026 Evidence Platform Issues Paper.

The Energy Efficiency Council (EEC) is the peak body for energy management in Australia. Our members include technology suppliers, energy service providers, governments, education providers and NGOs that have come together to ensure Australia harnesses the power of efficiency, electrification, and demand flexibility to deliver a prosperous, equitable, net zero Australia.

This submission focuses on selected issues only; lack of comment on other items outlined in the issues paper does not indicate an EEC position.

Electricity share of final energy consumption

EEC strongly welcomes the proposal to monitor the metric of electricity share of final energy consumption as part of Outcome ER1. This metric is a key indicator of Australia's progress towards meeting emissions targets and of the contribution of the demand side of the energy system.

Electricity's share of final consumption has broadly remained around 21% for the last two decades, with minor variations recorded at times such as the Covid pandemic.¹

EEC analysis drawing on the Climateworks Centre / CSIRO AusTIMES model finds that to align with a 2 degree pathway, Australia would increase electricity's share of final energy consumption to 32%; and to align with a 1.5 degree pathway would increase this share to 36%. These pathways align approximately with emissions reductions on 2005 levels of 61% and 75% respectively, suggesting a broadly similar target range for electricity share of final energy consumption to meet the Australian government's 2035 emissions reduction targets.

The proposed use of DCCEEW Australian Energy Statistics as a data source is likely appropriate. However, an important consideration is that these statistics

¹ DCCEEW Australian Energy Statistics data.

are typically released with a delay of around 2 years, with the latest data currently available for 2023-24. In the context of rapid transformation, any additional sources taking into account recent deployment or changes would increase the value of this indicator.

Alongside an economy-wide metric of electricity share of final consumption, we recommend monitoring electricity's share of final energy consumption on a sector-by-sector basis. These figures are provided in the Australian Energy Statistics.

Built environment metrics

We welcome the proposal to monitor gas disconnections data and heat pump imports, and support the use of AER and ABS data as proposed.

A gap remains in publicly reported data on the number of homes reducing their gas consumption through partial electrification or reduced usage. Significant reductions have been recorded in overall residential gas consumption in the Australian Energy Statistics that do not appear to be reflected in AER disconnection data. Gas consumption data or heat pump import, manufacture or installation data may provide additional insights.

The proposed use of average NatHERS and NABERS ratings as an indicator of built environment adaptation and resilience is appropriate. Unlike for new homes where ratings are routinely recorded and reported through the CSIRO Australian Housing Database, recorded rating data for existing homes remains highly limited. The development of NatHERS for existing homes and possible implementation of residential ratings disclosures schemes offers a major opportunity to expand this data and account for existing homes that are less likely to be resilient to extreme temperatures. In the interim, modelled residential ratings offer an alternative. The Commercial Building Disclosure program offers reported ratings in a small number of building categories, primarily offices; in other building types where reporting is not mandatory, reported data may give only a limited indicator of building resilience.

International examples

The Climate Change Authority should ensure existing best practice examples of indicators are considered in developing its approach.

The International Energy Agency (IEA) publishes an Energy End-uses and Efficiency Indicators database drawing on input from countries including

Australia.² The IEA has furthermore published guides and references on best practice approaches to developing demand-side data and energy efficiency indicators.³

The UK Climate Change Commission has developed a Mitigation Monitoring Framework, including 377 indicators across all major sectors.⁴ Indicators include deployment of key technologies and specific energy metrics alongside broader indicators such as workforce and community attitudes. We recommend consideration of the UK CCC indicators as part of the current consultation process.

EEC electrification tracker

EEC is currently conducting scoping on an ongoing independent **electrification tracker**. We anticipate this project will gather and analyse information on the pace of electrification in key sectors such as the built environment and the deployment of key technologies. We would welcome the opportunity to discuss this project with you.

Thank you for your consideration of our comments. Please do not hesitate to contact me at jeremy.sung@eec.org.au for further information or to discuss any issue raised in this submission.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jeremy Sung', with a stylized flourish at the end.

Jeremy Sung
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² Available at: <https://www.iea.org/data-and-statistics/data-product/energy-end-uses-and-efficiency-indicators> (viewed 29/4/26)

³ See <https://www.iea.org/reports/demand-side-data-and-energy-efficiency-indicators>; <https://www.iea.org/reports/energy-efficiency-indicators-essentials-for-policy-making>; and <https://www.iea.org/reports/energy-efficiency-indicators-fundamentals-on-statistics> (all viewed 29/4/26)

⁴ A full list of indicators is available from: <https://www.theccc.org.uk/publication/ccc-monitoring-framework/> (viewed 27/4/26)