ACT Government
By email: gastransition@act.gov.au

16 September 2026

To whom it may concern,

**Future appliance regulations to support the gas transition**

Thank you for the opportunity to provide a response to the ACT Government on the *Future appliance regulations to support the gas transition* discussion 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.

EEC strongly welcomes consideration of options to regulate gas appliances in alignment with the ACT's broader commitments to decarbonisation and electrification.

Efficient, electric homes deliver a wide range of benefits to households and to the wider community, including lower energy bills, improved health outcomes, lower emissions and supporting the broader transition from fossil fuels to renewable energy. Efficient, electric appliances such as reverse cycle air conditioners, heat pump hot water systems, and induction cooktops are widely available and are inherently more energy efficient than gas appliances.

While the ACT has taken important steps to ensure new homes are all-electric and offer incentives to households to electrify, the electrification of existing homes will not be achieved in line with the ACT's 2045 target without regulations on gas appliances.

This submission focuses on options for regulations (section 4). Lack of comment on other issues does not indicate an EEC position.

## Rental homes

We encourage the ACT government to expand existing minimum rental standards to include energy efficiency standards for fixed appliances and a requirement for the replacement of fixed gas appliances with efficient, electric alternatives at the end of life. As identified in the consultation paper, gas appliances being replaced in circumstances of breakdown and urgent repairs are often replaced like-for-like due to split incentives, costs, ease, and information barriers. Regulated requirements are a necessary intervention to address long-term impacts for renters and the broader energy system of decisions made at this key point. Victoria's minimum rental standards offer a detailed implementation model for regulations on gas heating, cooking and hot water at end of life.

In addition to minimum rental standards, ACT should consider shifting the responsibility for annual or daily gas network supply charges in rental homes from renters to landlords. The Residential Tenancies Act currently makes landlords responsible for water and sewerage supply charges, and renters responsible for energy supply charges. As renters do not have agency over the choice to install or maintain gas appliances, shifting the responsibility for fixed ongoing costs to landlords would better align costs with agency and mitigate the problem of split incentives for rental home energy upgrades. Under this model, renters would remain responsible for payment of usage charges. This measure has not been implemented elsewhere in Australia and offers an opportunity for policy leadership; changes to the RTA would be required and there may be additional interactions with other regulations or policy.

**Other regulations**

Requiring the replacement of gas appliances at end of life with efficient, electric alternatives in all homes is the most straightforward regulatory approach to facilitating the electrification of existing homes. This model is to be implemented in Victoria from early 2027 for hot water systems, with a range of exemptions such as where costs are considered unreasonable or where body corporate arrangements make installation difficult. While this approach would provide a clear territory-wide signal towards electrification, we acknowledge the consultation paper indicates this is not a preferred option for regulation. Should the ACT Government not opt to require all-electric replacements for gas appliances at end-of-life, other regulatory measures should be implemented.

In the absence of direct bans, mandated information at the point of sale and gas appliance work is appropriate. This information must include a statement on the planned phase out of gas networks and what this will mean for the use of appliances. Consumers would benefit from clear information alongside this statement on the expected cost of gas and the likely need to replace the appliance before end of life; information on efficient electric alternatives and the cost savings they deliver; and how to access existing ACT incentives and support programs. Information regulations should be monitored to understand their impact on consumer choices.

In the absence of a direct territory-wide requirement for all-electric replacements, it is also appropriate to prohibit gas appliance installation when a network section is identified for decommissioning. Regulations to ensure no new gas appliances are installed in areas identified for network decommissioning would protect consumers from clearly foreseeable additional costs and stranded assets. As noted in the consultation paper, the expected notice period for localised network decommissioning is likely to be shorter than the lifespan of typical gas appliances; many gas appliances may be expected to have a lifespan of 15-20 years, meaning that some appliances installed today would not reach end of life by the 2045 network shutdown deadline.

**Additional measures**

While outside of scope for this regulatory review, we note that a range of complementary measures are available to support the implementation of gas appliance regulations. These include continued consumer information, referral programs and financial incentives to ensure that household compliance with regulations is as simple as possible.

Additionally, regulatory and incentive measures to improve the thermal efficiency of homes through insulation, draught sealing, glazing and thermal shell upgrades align strongly with the replacement of gas heating with efficient electric alternatives. Thermally efficient homes improve comfort and the efficiency of electric heating appliances and should be pursued alongside electrification.

Monitoring and evaluation of the effectiveness of gas appliance regulations should be resourced and undertaken as the regulations are implemented. This monitoring should seek to understand if regulatory settings are achieving impact in line with the ACT's targets and strategy. Evaluation may additionally provide key insights for other jurisdictions planning for the future of gas networks.

Thank you for considering our comments. We would welcome the opportunity to engage with the ACT government on the regulation of gas appliances at any stage. Please do not hesitate to contact EEC Senior Advisor Rob McLeod at rob.mcleod@eec.org.au should you require any further information.

Yours faithfully,

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