Integrated Energy Policy Team

ACT Pathway to Electrification Consultation

**Re: ACT Pathway to Electrification**

Thank you for the opportunity to make a submission to the consultation on the ACT Pathway to Electrification. Our submission provides feedback on the transition period and considerations, specifically the necessity of ensuring disability perspectives and issues are incorporated in the move to electrification.

While we note that the regulation around new gas connections is currently open for consultation we note the electrification project is presented as a package so we also felt it was timely and appropriate to provide comment across a number of measures. We also see interdependent and linked issues and consequences.

About us

Advocacy for Inclusion incorporating People with Disabilities ACT[[1]](#footnote-1) is an independent organisation delivering reputable national systemic advocacy informed by our experience in individual advocacy and community and government consultation. We provide dedicated individual and self-advocacy services, training, information and resources in the ACT.

As a Disabled People’s Organisation, the majority of our organisation, including our Board of Management, staff and members, are people with disabilities. Advocacy for Inclusion speaks with the authority of lived experience. It is strongly committed to advancing opportunities for the insights, experiences and opinions of people with disabilities to be heard and acknowledged.

Advocacy for Inclusion operates under a human rights framework. We uphold the principles of the United Nations Convention on the Rights of Persons with Disabilities and strive to promote and advance the human rights and inclusion of people with disabilities in the community. Advocacy for Inclusion is a declared public authority under the Human Rights Act 2004.

Our approach

AFI supports measures to move our energy supply onto a sustainable footing which addresses our commitments to move away from fossil fuels by 2045. We note the need to address climate change through just transition approaches which mitigate their effects on people with disability as well as minimising unintended consequences from transition measures. People with disability are among the most vulnerable to climate change. Mitigations are urgent but should also be fair and avoid the double jeopardy of the group most at risk from climate change shouldering the brunt of measures to reduce emissions rather than large polluters.

The transition to electrification offers opportunities to improve quality of life for people with disabilities including moves to modern, safer household heating and kitchen appliances.  However, as the consultation paper notes, this undertaking is significant and presents some challenges to ensure a fair and equitable transition actually occurs. There is a real need for significant work to be done to understand the impacts of energy transition on people with disabilities and to identify ways to realise the potential for the transition to improve outcomes. This includes understanding how this transition looks in people’s everyday lives.[[2]](#footnote-2)

The transition should prioritise accessibility and universal design considerations in mandating the take up of electric products. People with disabilities on low incomes should be supported to manage price fluctuations and bill shock.  The additional vulnerability of people with disabilities to bill shock should be understood and factored into planning as should the reliance of people with disability on critical electrical devices in areas like mobility equipment or breathing assistance.  It should also prioritise planning for reliability of supply and safety for vulnerable people within the energy market.

Accessibility

Designers of electric vehicles, charging, infrastructure, and electric appliances must do better at ensuring universal access to their products by low-income people, older people, and people with disability. International research undertaken in the fields of accessibility and electric vehicle charging has indicated an increased willingness of people with disability to transition to electric vehicles.[[3]](#footnote-3) However, specific barriers remain.

These include addressing concerns around the accessibility of new electric vehicles for people with disabilities as well as charging infrastructure.[[4]](#footnote-4) For instance, newer vehicles are being built with features that make them incompatible with disabled driver modifications.[[5]](#footnote-5) Electric vehicle charging infrastructure is self-service which means that people requiring assistance will no longer have that support.

Further, we express concerns that the charging infrastructure is not always accessible. Government should work to develop and agree on industry standards and requirements and also use its own purchaser leverage. This may also be an area where federal industry development is required.

In the United Kingdom, for example, a new Publicly Available Specification, supported by the Office for Zero Emission Vehicles, has recently set out the minimum specification for an accessible public charge point. This provides a new standard to ensure this infrastructure is accessible to users.

The accessibility of public charging infrastructure is particularly salient given the lower rates of home ownership and housing precarity among people with disabilities.[[6]](#footnote-6) Home or work-based charging can increase the independence of a driver with a disability. However, people with disability are less likely to own their own home and more likely to rent (private and social) housing which has less off-street parking availability. This increases the dependence on public charging infrastructure.

There is a need to ensure that people with disabilities share in the benefits of Consumer (previously Distributed) Energy Resources (CER/DER) such as rooftop solar, household batteries, and electric vehicles. It is critical that these resources benefit the collective – as well as their owners – and that the costs of integrating these into the electricity system is distributed equitably.

AFI also notes that there are accessibility barriers stemming from some newer electrically designed household products for older people and people with disabilities. For instance, programmable ovens or heaters with touchscreens and complicated interfaces which cannot easily be managed by someone with a visual impairment or cognitive issues or are difficult for elderly people used to managing older devices.

As gas devices are removed, there needs to be additional hands-on assistance to use these devices along with adaptions. This response should come within the transition and not be an expectation of the NDIS. There is evidence of market failure in the design of some household products which are not affordable or accessible to some users. There is little to no regulation ensuring the accessibility of, for example, household electrical appliances. As the take up of these and similar products is mandated, government has a role in ensuring that they are accessible.

Cost

Energy transition and electrification needs to be framed in terms of a just and fair transition, leaving no one behind.[[7]](#footnote-7) Across Australia, households in lower income groups already spend a much larger proportion of their income on electricity and heat while consuming much less in absolute terms.[[8]](#footnote-8) The lowest income quintile, for example, already spends almost four times as much of their disposal income on electricity and heat compared to the highest income quintile.[[9]](#footnote-9)

There are real risks to gas consumers regarding declining gas demand. As the gas network is phased out in the ACT, those unable to transition to 100 per cent electricity will face higher gas network costs as they are spread across a declining customer base.[[10]](#footnote-10)

Rising energy costs and resultant energy stress impacts people with chronic health conditions and disability disproportionately. Since 2016, Canberra has already experienced significant increases in prices for a range of essential goods and services. Analysis conducted by the ACT Council of Social Services (2022) demonstrated that electricity and gas prices has already increased 28.1 per cent and 24 per cent, respectively.[[11]](#footnote-11)

We also note ongoing cost fluctuations in the new energy market. High prices for gas and electricity during the transition disproportionately affect people with disabilities on modest incomes, unlike high income earners who can meet the rising costs due to greater disposable incomes. Disability often incurs higher living expenses due to medication, treatment, and premiums placed on more specific items.

Economic analysis has identified the ‘less obvious higher costs’ experienced by people with disability which tend to go unreported because the costs are ‘ignored, internalised, or forgotten.’[[12]](#footnote-12) People with disability also report greater use of heating and cooling and more expensive transport modalities. ‘Free’ or low-cost workarounds are often inaccessible or unavailable. These additional costs amount to a disability premium between 2 and 5 per cent above the costs faced by people without disability.

High prices for gas and electricity have the potential to worsen this existing disability premium, ultimately placing people with disability at increased risk of energy stress and poverty.

Reliability

AFI notes the need to prioritise work to minimise and manage any potential supply interruptions within the renewable network as a whole as the ACT moves to 100 per cent electrification.

As we move towards an electricity market reliant on balancing supply and demand and real-time data from consumers instead of baseload power some authorities have noted potential vulnerabilities related to cyber-attack or other circumstances.[[13]](#footnote-13) AEMO has also noted risks of outages at individual plants.[[14]](#footnote-14) It is essential that investments continue to be made across projects promoting renewable, storage, transmission and demand response in order to mitigate these risks.[[15]](#footnote-15)

Planning for the transition should include provision for emergency supply by people with medical devices, existential heating and cooling needs and other issues requiring a reliable affordable supply of power and backups such as home batteries. Power outages in Australia have already had tragic outcomes for people with disability reliant on specific medical devices. In Perth, two young men died when their respirators failed during a major storm in 2014, and in Adelaide, a power line malfunction resulted in the death of a man relying on a ventilator.[[16]](#footnote-16)

High levels of attention should be given to unforeseen circumstances within electricity outage events such as the situation of people on home ventilation or oxygen, car dependent people being unable to access vehicles in electric garages or people being unable to charge electric mobility scooters or other assistive devices.

This submission is also endorsed by the ACT Council of Social Services (ACTCOSS). The contact for this endorsing body is Lyndsay Bassett, Senior Policy Adviser.

Please feel free to contact me on 0477 200 755 or via Craig@advocacyforinclusion.org to discuss this submission further.

Regards,

(Submitted online)

**Craig Wallace**

Head of Policy

Advocacy for Inclusion

20 April 2023

1. On March 24, 2021, Advocacy for Inclusion (AFI) officially merged with People with Disabilities ACT (PWDACT), a systemic advocacy organisation based in the ACT. Herein, reference to ‘AFI’ also acknowledges the values and philosophies of PWDACT. [↑](#footnote-ref-1)
2. For an illustrative example, see Strengers, Y., et al. (2023) [‘Digital Energy Futures: Future Living Energy Scenarios 2030/2050.’](https://www.monash.edu/__data/assets/pdf_file/0009/3190185/PDF-Digital-Energy-Futures-Scenarios-for-Future-Living.pdf) Emerging Technologies Research Lab, Monash University. Melbourne, Australia. [↑](#footnote-ref-2)
3. Harris, E. (2020). [‘Going electric? Research report into the accessibility of plug-in electric vehicles.’](https://www.ridc.org.uk/sites/default/files/uploads/Research%20Reports/ElectricCars/RiDC_ElectricCars_Report.pdf) Supported by Motability. London: Research Institute for Disabled Consumers. [↑](#footnote-ref-3)
4. Hekman, J., and Weldon, P. (2020). [‘Electric Vehicle charging infrastructure for people living with disabilities.](https://www.motability.org.uk/media/nghmmyu0/electric_vehicle_charging_infrastructure_for_people_living_with_disabilities_ricardo_energy_and_environment.pdf)’ Report for Motability. UK: Ricardo Energy & Environment. [↑](#footnote-ref-4)
5. See e.g., Reardon, C. (2021). [‘Electric vehicles are the future for everyone – except disabled people.’](https://www.theverge.com/2021/7/2/22550853/electric-vehicles-disabled-wheelchair-conversion-battery) *The Verge.* 2 July 2021; accessed 6 April 2023. [↑](#footnote-ref-5)
6. See Advocacy for Inclusion (2022) [White Paper on Housing](https://www.advocacyforinclusion.org/wp-content/uploads/2022/10/White-Paper-Housing-12-October-2022-FINAL.pdf). Canberra, ACT. [↑](#footnote-ref-6)
7. ACT Council of Social Services (2023) [A Just and Inclusive Gas Transition in the ACT: Prioritising equity on our pathway to electrification](https://www.actcoss.org.au/sites/default/files/public/publications/2023%20report%20-%20A%20Just%20Gas%20Transition%20in%20the%20ACT%20.pdf). ACTCOSS, Canberra. [↑](#footnote-ref-7)
8. Energy Consumers Australia (2023) [Submission to the Select Senate Committee on the Cost of Living](https://energyconsumersaustralia.com.au/wp-content/uploads/20230309_Submission-to-SDunstone-re.-Select-Senate-Committee-on-Cost-of-Living.pdf). Figure 3, p. 3. [↑](#footnote-ref-8)
9. Chandrashekeran, S., et al. (2022) [‘Energy Affordability: Sharing Lessons from the EU and Australia’s Low Carbon Transitions.’](https://www.climatecollege.unimelb.edu.au/files/site1/docs/%5Bmi7%3Ami7uid%5D/AUS_EU_Affordability_FINAL_VERSION_V2.pdf) The University of Melbourne, Australia, and the Oeko-Institut, Berlin, Germany. [↑](#footnote-ref-9)
10. See e.g., Energy Consumers Australia (2023) [Risks to gas consumers of declining gas demand](https://energyconsumersaustralia.com.au/wp-content/uploads/230109_Report_Risks-to-gas-consumers-of-declining-gas-demand_final.pdf). Boardroom Energy. [↑](#footnote-ref-10)
11. ACT Council of Social Services (2022) [ACT Cost of Living Report: Tracking changes in the cost of living for low-income households in the Australian Capital Territory](https://www.actcoss.org.au/sites/default/files/public/publications/2022-report-ACT-Cost-of-Living.pdf). ACTCOSS, Canberra, p. 6. [↑](#footnote-ref-11)
12. Frisch, J. (2001) [Towards a Disability Allowance: Offsetting the Costs of Disability – an analysis](https://www.aph.gov.au/~/media/wopapub/senate/committee/clac_ctte/completed_inquiries/2002_04/poverty/submissions/sub188_pdf.ashx). The Sidney Myer Fund and the Physical Disability Council Australia. Such costs include higher prices for similar goods due to inaccessible buildings, shops or transport, the inability to shop around for or take advantage of mark-downs or bargains, a greater reliance on more expensive, or more proximate, smaller convenience stores, and higher prices for non-basic models with added functionality. [↑](#footnote-ref-12)
13. International Energy Agency (2020). [Power Systems in Transition.](https://www.iea.org/reports/power-systems-in-transition) IEA, Paris. [↑](#footnote-ref-13)
14. Australian Energy Market Operator (2023) [Update to the 2022 Electricity Statement of Opportunities (ESOO) report.](https://aemo.com.au/-/media/files/electricity/nem/planning_and_forecasting/nem_esoo/2023/february-2023-update-to-the-2022-esoo.pdf?la=en&hash=1AED91846C35DE3DE0BFC071A2228EAD) A report for the National Electricity Market. Australian Market Operator Limited. [↑](#footnote-ref-14)
15. McConnell, D. (2023). [‘Australia’s energy market operator is worried about the grid’s reliability. But should it be?’](https://theconversation.com/australias-energy-market-operator-is-worried-about-the-grids-reliability-but-should-it-be-200355) *The Conversation,* 22 February 2023; accessed 6 April 2023. [↑](#footnote-ref-15)
16. ABC News (2014). [‘Brother pays tribute to men who died in Perth storm after power failure cut their breathing machines.’](https://www.abc.net.au/news/2014-07-15/brother-pays-tribute-to-man-who-died-in-perth-storm-after-power/5597012) 15 July 2014; accessed 6 April 2023; Nicholson, L. (2015). [‘Inquiry call as SA man on life support dies during power outage.’](https://indaily.com.au/news/2015/12/16/inquiry-call-as-sa-man-on-life-support-dies-during-power-outage/) *In Daily,* 16 December 2015; accessed 6 April 2023. [↑](#footnote-ref-16)