

Mr Arek Gulbenkoglul
General Manager
Australian Energy Regulator
GPO Box 3131 Canberra, ACT, 2601

Submission email: JGN2025@aer.gov.au.

Dear Mr Gulbenkoglul,

I write on behalf of Better Renting, a community of renters working together for stable, affordable, and healthy homes. A key area of work for us is making sure that renters can afford to keep their homes at healthy temperatures. We have done lots of work around minimum energy performance standards for rental homes. A related and important issue is gas usage in rental households. We want to ensure that renters can reap the benefits of household electrification and aren't stuck on a gas network facing increasing costs.

This concern is becoming more and more timely. The ongoing consultation on Jemena Gas Network's 2025-30 Access Arrangement Plan offers an opportunity for the Australian Energy Regulator to seriously consider what is best for consumers — including renters — in the face of a decline in gas customer numbers.

We have heard from Energy Consumers Australia on their analysis of the impacts of a declining use of the gas network on consumers and are concerned with what the implications may be for renters across NSW.

We would like the AER to consider how Jemena may:

1. **Reduce unnecessary costs.** Jemena proposes unjustified costs, including costs related to their metering replacement program and to connecting fossil gas alternatives to the network. Reducing system costs must be the central pillar of any gas transition strategy.
2. **Discourage consumers from connecting to the network and support those who wish to disconnect.** New connections will increase the costs needing to be recovered from remaining gas customers and lock new customers into paying for a service that will become increasingly expensive. Jemena needs to require new customers pay the upfront connection costs and reduce disconnection and abolishment costs, in line with Victoria's decision.
3. **Ensure consumers are not unfairly paying for the declining use of Jemena's network.** Accelerated depreciation, where customers pay more now to reduce the amount needed to be paid off later, unfairly shifts risk from Jemena to customers.

We ask that the AER ensures these areas are a focus of its review of Jemena's plan.

Kind regards

Joel Dignan
Better Renting