

Date: 13th of November 2025

To:

Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

Subject: Endorsement of the First Peoples Program – Net Benefits to the Community and the distribution networks

Dear AER,

As Chair of the First Peoples Advisory Committee (FPAC), I write in support of the First Peoples Program included within United Energy's Customer Assistance Package submitted to the AER as part of the 2026–2031 regulatory proposal.

FPAC was established in 2023 to provide direct advice and guidance to United Energy on matters affecting First Peoples across their network areas. Our Committee oversees the businesses Reconciliation Action Plans and brings lived experience of the challenges our communities face in accessing safe and affordable energy security.

The First Peoples team at United Energy have undertaken engagement within the communities across the network, and it has become clear that First Peoples customers are experiencing a widening **energy equity gap** — characterised by reduced access to affordable energy, outdated and inefficient appliances, and heightened exposure to climate-related risks. The First Peoples Program is designed to address these issues in a culturally appropriate and evidence-based way.

The Program's suite of initiatives, including the **60+ Energy Program**, **Energy Literacy Program**, and **Energy Appliance Upgrade**, represents a comprehensive approach that builds **capacity, resilience and self-determination**. These initiatives will:

- Improve the health and wellbeing of Elders and community members by enabling access to heating and cooling;
- Build local capability through culturally led energy literacy and education;
- Reduce energy costs for low-income First Peoples households through energy-efficient upgrades.

From an AER assessment perspective, the **net benefits** of the program are substantial and measurable:

1. **Economic Efficiency:** The program will reduce long-term network and system costs by improving energy efficiency, reducing demand spikes, and strengthening community resilience to outages.
2. **Social Equity:** By directly addressing barriers to participation in the energy transition, it ensures fair access and contributes to Closing the Gap targets.
3. **Community Trust and Legitimacy:** Co-design and governance through FPAC provides transparency, accountability, and ongoing oversight — strengthening the trust relationship between United Energy's and First Peoples communities.

4. **Regulatory Value:** The model demonstrates best practice for embedding First Peoples perspectives in network planning and could set the standard of broader sector reform under the AER's Consumer Engagement Framework.

The administrative costs within the First Peoples Program are essential to support the program's uptake and effectiveness. These resources enable staff to guide applicants through the process, ensuring they understand and can access opportunities, while also maintaining a culturally safe environment throughout. Proper administration ensures that all aspects of the program—from applications to delivery—are managed respectfully, efficiently, and in alignment with the needs and values of First Peoples communities.

FPAC has reviewed and **endorsed the First Peoples Program** in full. We are confident it delivers meaningful, lasting benefits — not only to First Peoples communities but to all customers through improved network performance, avoided social costs, and enhanced trust in the energy system.

Additionally, the First Peoples team will work closely with FPAC to develop an evaluation framework to account and assess each programs' performance, develop its governance and ensure the sharing of knowledge gained. FPAC will ensure that the programs remain agile, fit-for-purpose and responsive to First Peoples customer needs.

We urge the AER to support the inclusion of the First Peoples Program in the final determination, recognising that this investment provides measurable economic, cultural, and social returns consistent with the long-term interests of customers.

Yours sincerely,



Pauline Ugle

Chair, First Peoples Advisory Committee
United Energy