

ENERGY ROADMAP AMENDMENT BILL 2025

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Governance, Energy and Finance Committee
Parliament House
George Street
BRISBANE QLD 4000

By email: GEFC@parliament.qld.gov.au

Dear Committee Members

Energy Roadmap Amendment Bill 2025 ('the Bill')

Thank you for the opportunity to provide feedback in relation to the above and the related Queensland Energy Roadmap ('the Roadmap').

About QCOSS

Queensland Council of Social Service (QCOSS) is Queensland's peak body for the social service sector. Our vision is to achieve equality, opportunity, and wellbeing for all Queenslanders.

The development of this submission is based on consultation with QCOSS member organisations. This includes QCOSS' long-standing Essential Services Consultative Group (ESCG). Membership of the ESCG consists of community organisations that seek to ensure energy consumer needs are better represented in policy, regulatory and industry decision-making. QCOSS is also a member of the [Power Together](#) Alliance,¹ which seeks to ensure that no Queenslanders are left behind in the energy transition.

QCOSS' position

Our response to the Bill is grounded on the view that energy is an essential service and that the energy system exists to serve the community. Enduring energy affordability, safeguarding for sufficient supply and community ownership are key to ensuring equity in the delivery of this essential service the future. With disasters and extreme weather events increasing in prevalence Queensland, a clean energy system is the best way to mitigate these risks, while building social license to support an energy transition.

We commend the objectives of the Bill to improve existing provisions, with the intention of reducing cost, streamlining for efficient administration and removing duplicative policy functions. We do not support the removal of legislated targets for renewable energy without sufficient measures to ensure continuing clean energy supply into the future.

Energy is an essential service that supports community livelihood and wellbeing, including for vulnerable Queenslanders. For example, many households living with a disability and older individuals require reliable energy for essential medical equipment, refrigeration for medication and use of assistive technologies that support daily living. Similarly, households in regional and remote

¹ Power Together Alliance. *Power Together Policy Platform*. Power Together; 2025. <https://powertogogether.org.au/about-power-together/2025-policy-report/>. Accessed October 30, 2025.

locations live in areas where access may be compromised by multiple factors, including not yet being connected to the grid, being in an embedded network, or being reliant on card operated pre-payment meters. All consumers deserve access to affordable, reliable and sustainable energy as per the intent of the Roadmap and the Bill.

Enduring energy affordability

We support the continuation of renewable generation in the Roadmap and continued provisions in the Bill to support demand growth in the energy system with new and clean technology. We commend the \$400 million Queensland Energy Investment Fund for driving private investment into renewable energy generation. We note that a four-fold allocation of funds is also invested in the \$1.6 billion Electricity Maintenance Guarantee as an economic solution intended to lower energy prices.

While the economic rationale for supply side savings for household remains unclear, we commend the mention of demand side management in the Roadmap, and the featuring of the Supercharged for Solar for Renters Scheme. This program acknowledges the higher bills paid by renters due to living in homes with poorer energy efficiency and their need for accessing clean energy technologies. The Roadmap's inclusion of household energy efficiency as a policy agenda and objective provides a clear pathway to achieve improved energy affordability.

As demonstrated by QCROSS household budget modelling,² the budgets of low-income individuals and families are tight and even slight increases in prices push them into energy debt and hardship. Investing in programs for targeted and automatic bill relief will ensure all households have access to electricity. Increasing the uptake of concessions and removing administrative barriers to debt relief measures will create a safety net for low-income households that continue to more of their disposable income on energy.³ Energy literacy programs are another effective measure to reduce usage and cost for consumers.⁴

Safeguarding the energy system

We support provisions in the Bill to retain frameworks that enable continued work for securing system needs.⁵ We welcome the recommitment to public ownership in the Bill with provisions for 100 per cent public ownership of transmission, distribution and deep storage, as well as for *existing* operational generation assets. However, the amendment to remove the target for 54 per cent ownership of *future* generation assets will over time lead to public ownership being compromised and minority public control over these assets. With newer assets no longer being acquired and publicly owned existing generation assets aging, the burden of maintenance, cost and risk management for ensuring public safety and reliability becomes higher.

The longstanding benefits of public ownership have been a core feature of the Queensland energy system and to date tangible benefits of public control has been enjoyed by many in accessing electricity as an essential service. It is inevitable that with the higher costs of supplying electricity to dispersed populations and the infrastructure needed to maintain the network over large distances, government support is needed. Under the Uniform Tariff Policy in operation in Queensland, subsidies of \$604 million were provided in 2024-25 through Community Service Obligations (CSO) so that regional consumers can access electricity on a fair and reasonable basis (including \$94 million for isolated communities).

² Queensland Council of Social Service. Living Affordability in Queensland. QCROSS; 2024. Accessed October 30, 2025. <https://www.qcross.org.au/publication/report-living-affordability-in-queensland-2024/>.

³ Especially the Home Energy Emergency Assistance Scheme (HEEAS) <https://www.qld.gov.au/community/cost-of-living-support/concessions/energy-concessions/home-energy-emergency-assistance-scheme>.

⁴ QCROSS Charge Up! program is a project to help low-income and vulnerable Queensland households better understand their energy use and bills. <https://www.qcross.org.au/project/energy-and-water/>.

⁵ These may include frameworks for Priority Transmission Investment (PTI) and Renewable Energy Zones (REZ) to be renamed Regional Energy Hubs ('hubs').

Disaster and climate mitigation

We welcome the Roadmap's recommitment to net zero by 2050 and intention to include whole-of-economy approach to emissions reduction.⁶ Importantly, the emissions reduction targets remain enshrined in the Clean Economy Jobs Act 2024. However, the removal of legislated targets for renewable energy generation is misaligned with this objective. We support measures to facilitate private sector investment in clean energy generation through enabling actions of Government and Government Owned Corporations. However, without a renewable energy target it is unclear how the Queensland energy system will meet goals to reduce emissions and impacts on the environment.

The severe impact of increasing disasters and extreme weather events on the community is clear and Queensland needs to mitigate these risks.⁷ Climate change disproportionately impacts people and communities experiencing disadvantage, leading to health risks, economic instability and displacement. Queensland requires an energy system that is based on clean and renewable energy to reduce emissions.

QCROSS is signatory to a campaign by the Australian Council of Social Services (ACOSS) for fast fair inclusive climate change action.⁸ The potential impact of climate change on communities is too great to risk and warrant inaction.

Social license and community consultation

We support efforts to ensure social license and consider community impacts that the Code of Conduct in the Roadmap seeks to create.⁹ In reforming the renamed Regional Energy Hubs for coordinating market-led projects, considerations should be given to social impacts, cultural heritage, and the environment in consultation with Traditional Owners in each region. There are also opportunities for building social license for an equitable energy transition through community benefit schemes. Community batteries contained in the Roadmap have the potential of fulfilling both system load management and genuine community benefit to capture and store rooftop solar generation and release energy during peak demand for the benefit of community groups.¹⁰

The Statement of Compatibility associated with the Bill and Roadmap shows many examples where the cultural rights of Aboriginal peoples and Torres Strait Islander peoples protected by the Human Rights Act 2019 are limited. The former governance structure to be repealed included opportunities for consultation, including with Traditional Owners.

We also raise concerns regarding the timeframes within which the Bill is tabled for consultation through parliamentary processes, with the public hearing occurring before submissions are due, resulting in sufficient consultation. The Roadmap referencing extensive consultation with investor, industry and stakeholder advocates. However, consumer interests should be front of mind. QCROSS welcomes the opportunity to engage as a peak body for the community sector.

Conclusion

The energy system exists to serve the community. Our submission aims to highlight the need for enduring energy affordability and safeguarding of an energy system that provides an essential service to vulnerable Queenslanders. Queensland consumers need assurances that a credible long-

⁶ However, neither the Roadmap or Bill makes explicit reference to climate impacts by energy generation.

⁷ Climate Council. State of Queensland: Disaster Ground Zero [report]. Published 2024. Accessed October 30, 2025. https://www.climatecouncil.org.au/wp-content/uploads/2024/11/CC_MVSA0413-CC-ELCA-Report-Queensland-Climate-Impacts_V8-FA-Screen-Single.pdf.

⁸ Australian Council of Social Service. Fast, fair, inclusive climate action. ACOSS website. Published 2022. Accessed October 30, 2025. <https://www.fairfastclimateaction.org.au/resources>.

⁹ QCROSS was involved in co-design process for a guidelines/ toolkit for engaging communities and landholders in areas impacted by renewable energy development, led by Queensland Renewable Energy Council (QREC) and Energy Charter.

https://qrec.org.au/wp-content/uploads/2025/05/Queensland-Renewable-Energy-Developer-Investor-Toolkit_FINAL-TOOLKIT.pdf

¹⁰ As proposed by the Power Together Alliance.

term plan exists, with clear alignment to emissions reduction and for the government to retain ownership of the energy system into the future.

Thank you again for the opportunity to provide our submission.

Yours sincerely



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