



Compliance Quarterly Report

Financial year – 2025-2026

Quarter 2: 1 October 2025 to 31 December 2025



NETCC Compliance Report

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Introduction

The New Energy Tech Consumer Code (NETCC) protects the integrity of the program and consumers through four actions:

- Rejecting applications from retailers that do not meet the NETCC requirements.
- Investigating complaints against Approved Sellers and sanctioning those found in breach of the NETCC. Suspending, cancelling, and removing Sellers from the program where serious, repeated, or wilful violations of the NETCC are identified.
- Conducting compliance audits of Approved Sellers to assess compliance of their sales activities.
- Supporting Signatories with compliance by providing learning material and advice gathered from observed trends and non-compliance.

This report covers the second quarter of the 2025-26 financial year (Q2FY25-26) and provides insight into the NETCC program trends, including applications, consumer complaints received, audits and compliance actions. It also offers case studies to help Code Approved Sellers stay informed and enable ongoing compliance.

- Q2 FY25-26 continued to see high case numbers with the Administrator opening 175 complaint cases. 42% of complaints received in Q2 of FY25-26 originated from Victoria.
- The Administrator finalised 137 complaint cases in Q2 FY25-26. The most common observed breaches were in relation to quoting obligations (clause 9 of the NETCC).
- The Administrator anticipates this trend of complaint numbers to continue because of the government's federal and state-based battery subsidy schemes and programs.
- The Administrator has observed several Approved Sellers employing non-compliant sales tactics whereby Sellers are accepting offers before supplying consumers with compliant quotes. Quotes contain important information that helps a consumer make an informed decision in their best interests. The Administrator reminds all Approved Sellers that consumers must be provided with a written quote that complies with clauses 9 to 18 of the code. The case study contained in this quarter's report examines an investigation conducted by the Administrator to address this sales tactic.

We will soon be releasing a new NETCC Sales and Installation Agreement template that can assist Approved Sellers in complying with key requirements of the Code. The template is designed to provide Approved Sellers with comprehensive and compliant Terms and Conditions (T&Cs) of sale that allow consumers to make an informed purchase decision. This new Agreement template will be available for free, for eligible Approved Sellers that previously purchased a Sales and Installation Agreement template under the Clean Energy Council's Approved Solar Retailer (ASR) program. Non-eligible Sellers will be able to purchase the template. Approved Sellers will be notified when it is available.

The template will be editable so businesses can tailor it to suit their business needs, and it has been developed in conjunction with a legal consultant.

This information includes, but is not limited to, the quote, schedule of works, payment and finance, system design and performance, T&Cs, complaints handling, special conditions, and additional attachments such as the product information.

Approved Sellers that previously purchased a Sales and Installation Agreement template under the Clean Energy Council's Approved Solar Retailer (ASR) program, can obtain a free version of the NETCC Sales and Installation Agreement template by [contacting](#) the NETCC Administrator.

NETCC application trends

	Q2 FY24-25 Oct – Dec 2024	Q3 FY24-25 Jan – Mar 2025	Q4 FY24-25 Apr – Jun 2025	Q1 FY25-26 Jul – Sep 2025	Q2 FY25-26 Oct – Dec 2025
New applications received	91	98	264	224	166
Applications approved	101	78	139	245	171

The Administrator continues to see a steady uptake of the NETCC Program, and high numbers of applicant approvals.

In October 2025, the NETCC hit a significant milestone, surpassing 2,000 Approved Sellers across Australia.

This growth has been supported by the inclusion of the NETCC in state-based government programs, which signals to industry the expected standards and level of consumer protection required when participating in these rebate schemes, and delivering new energy tech products or services to consumers.

Following the announcement of the WA Residential Battery Program in July 2025, the NETCC experienced a marked increase in industry engagement. During the second half of the year, the NETCC received 162 new applications from WA-based businesses seeking to become Approved Sellers and commit to the Code standards. Over this period, WA recorded the highest number of Approved Sellers nationally.

In mid-December 2025, the Queensland Government announced the Supercharged Solar for Renters program. While only a short reporting window falls within this cycle, the NETCC has already observed a notable increase in applications from Queensland based businesses and anticipates similar upward trends as the program progresses.

The inclusion of NETCC Approved Sellers in these government schemes strengthens consumer protections, helps prevent harm through robust checks and balances, and promotes the necessary trust and confidence in the new energy tech market.



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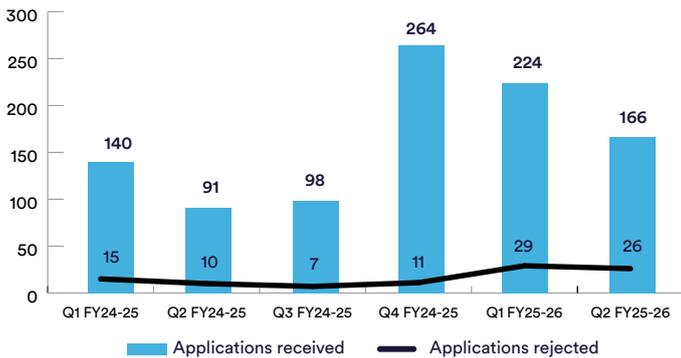
NETCC applications received and rejected

The Administrator has continued to see high application numbers with 166 new applications received this quarter with 20 of these applications not being approved.

An application may not be approved if:

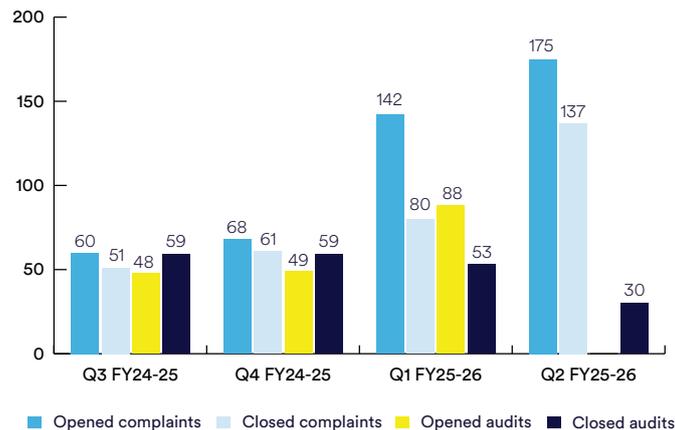
- the applicant withdraws their application
- the applicant is unable to provide the requested documents in time, and they may recommence the application later
- the applicant may fail to demonstrate sufficient understanding of the Code across multiple reviews, support, and submissions.

It is critical that applying businesses fully understand the Code's requirements and what is expected from them as an Approved Seller.



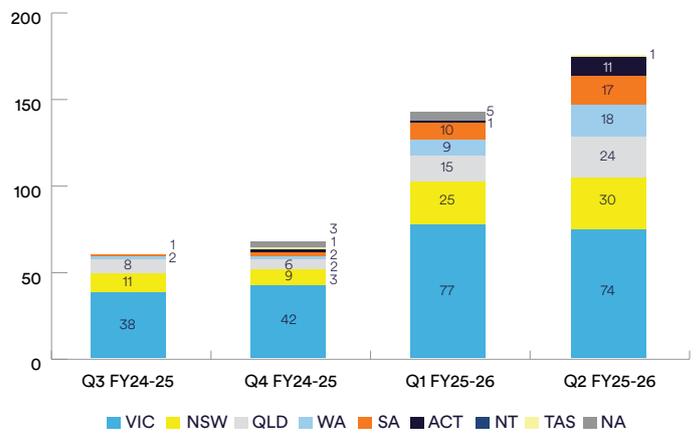
NETCC compliance cases opened and closed

This quarter, the Administrator opened 175 compliance cases and closed 167 cases following a complaint or audit investigation. No audit cases were opened this quarter, and of the 167 closed cases, 137 were complaint investigations.



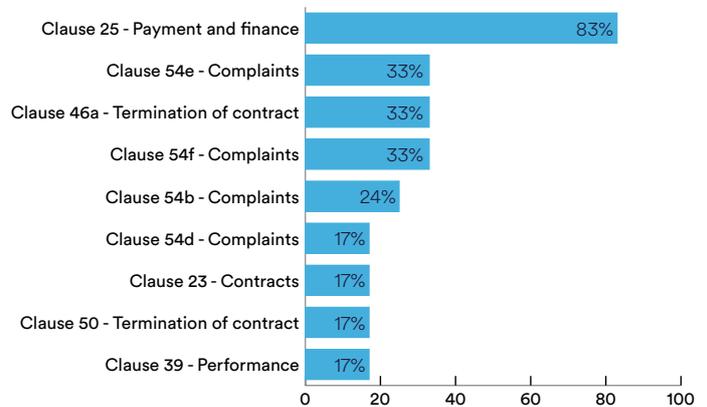
NETCC complaints received by Origin of Case (state / territory)

42% of complaints received in Q2 of FY25-26 originated from Victoria. This is below the average of the previous three quarters, which saw 58% of all complaints received from Victoria. The Administrator observed a notable increase in complaints originating from Western Australia, South Australia and the Australian Capital Territory this quarter compared to the previous three quarters, making up 10%, 10% and 6% of all complaints received in Q2 of FY25-26 respectively.



NETCC compliance audits opened and closed

12 competency audit questionnaires were completed in Q2 FY25-26 to test Approved Sellers by examining their knowledge of the Code. The top six most incorrectly answered questions remained unchanged between Q1 FY25-26 and Q2 FY25-26 and relate to Complaints handling, Termination of the Code and Payment and finance requirements of the Code.



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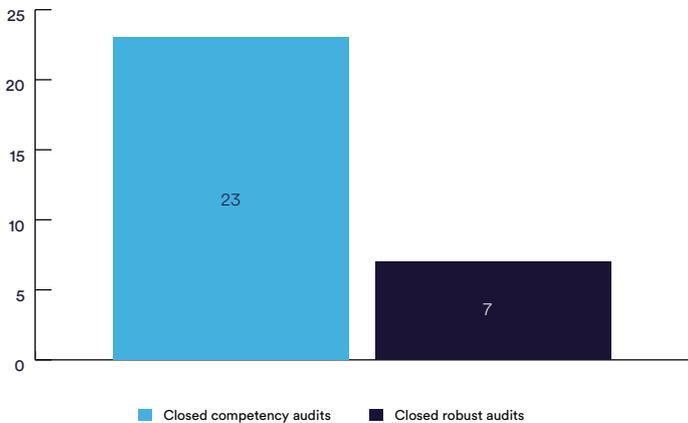
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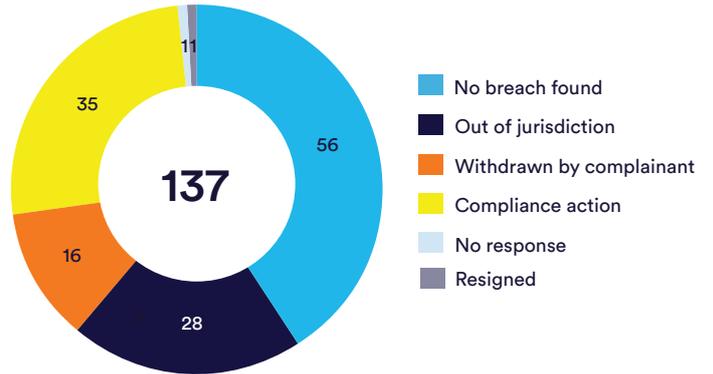
No audit cases were opened this quarter. Of the 30 audit cases closed this quarter, 23 were cases related to competency audits and 7 were robust audit cases.

Competency audit cases are raised where Approved Sellers fail to complete or score 80% in the competency audit questionnaire.

Robust audit cases involve reviews of recent sales activities by examining the compliance of sales quotes and contracts, as well as an audit of online presence, mainly relating to advertisements and promotions.



12% of cases were closed after the complainant withdrew their complaint, and 0.7% of cases were closed following no response. In both scenarios, the Administrator was unable to progress the investigation further due to insufficient evidence and or details relating to the complaint.



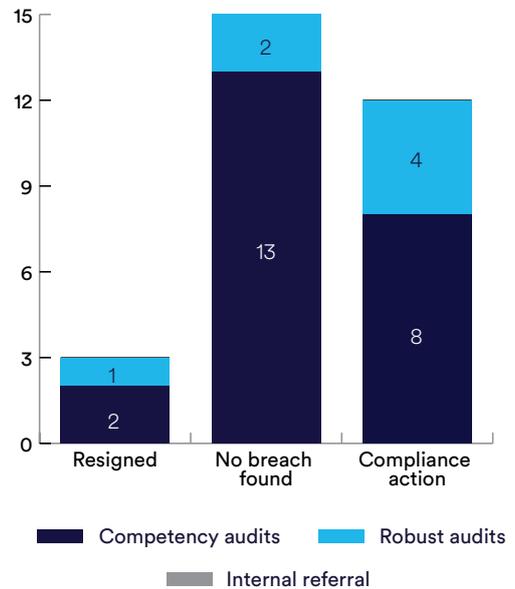
Of the 30 closed audit cases in Q2 FY25-26, 40% resulted in compliance action. 67% of the closed audit cases that resulted in compliance action were competency audit cases. This quarter, three of the closed audit cases resulted from Sellers resigning from the program.

Closed complaint case outcomes

This quarter, the Administrator closed 137 complaint-based compliance cases. Of these cases, 0.7% were closed as the Approved Seller resigned from the NETCC program before the investigation was finalised. These unresolved cases are considered when businesses or associated individuals reapply to enter the program. Re-entry into the NETCC program is not permitted where applicants cannot demonstrate they have resolved a case that was closed due to resignation.

26% of closed complaint cases resulted in compliance action against Approved Sellers. Compliance action is recorded against the Seller as a Support to Comply (STC) or a breach. Breaches generally require the Sellers to deliver more significant corrective actions to resolve the breach, while an STC acts as a formal warning and does not require extensive remedial actions.

41% of closed complaint cases resulted in no breach found following the Administrator's investigation, and 20% were closed as out of jurisdiction after the Administrator identified the incident was outside of the NETCC scope.

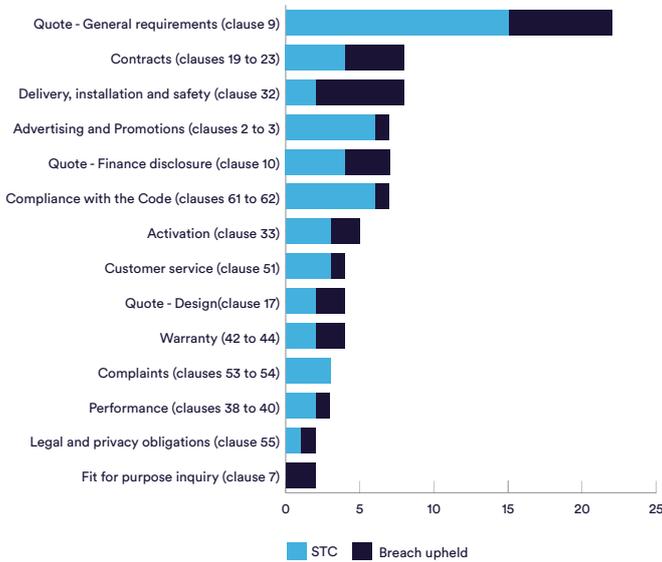


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Breaches and support to comply (STC) notices issued



For a full description of the clauses, please refer to the New Energy Tech Consumer Code itself: [New-Energy-Tech-Consumer-Code.pdf](#)

Of the 137 closed compliance cases that originated from complaints, 86 instances of non-compliance were recorded this quarter, where a Seller failed to comply with a requirement of the Code. Of the 86 instances, 53 were issued under a support to comply notice, which acts as a formal warning, and 33 were recorded as breaches.

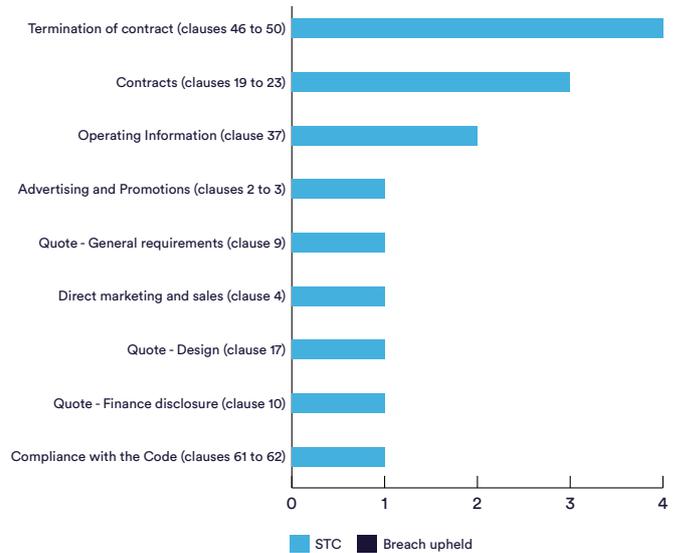
All 86 instances of non-compliance with the Code's requirements require the Seller to complete remedial actions with recorded breaches demanding more substantial actions.

Similar to the previous two quarters, the Administrator found that the most common breach of the Code in Q2 FY25-26 was in relation to:

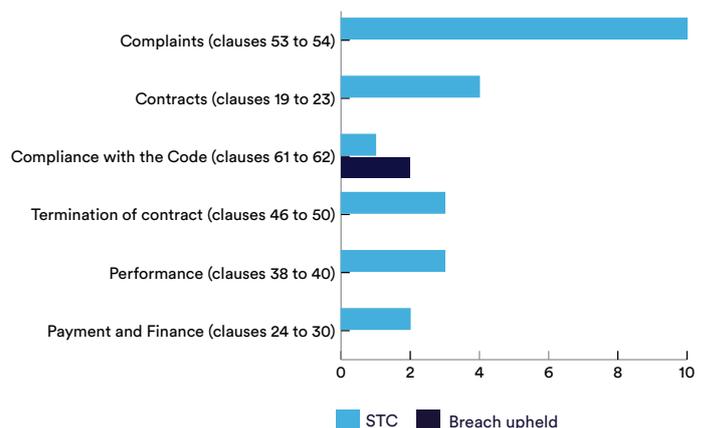
- Quote – General Requirements (clause 9) – 15 STCs, 7 breaches

The Administrator has observed some Sellers revert to using non-compliant versions of their quotes after having their sales documentation assessed as part of their application review to become a NETCC Approved Seller. The Administrator works with applicants to amend and update their quotes to comply with the NETCC through the application review process, and expects that Approved Sellers use approved versions of their quotation and

contract documents once accepted onto the NETCC program. The Administrator has also observed some Approved Sellers have failed to update their quotes and contracts to comply with the NETCC after being transitioned from the Approved Solar Retailer (ASR) program when the NETCC program launched in 2023. Approved Sellers must ensure that quotes used to sell new energy technologies are compliant with the NETCC by reviewing the pre-sales requirements of the NETCC, especially clauses 9 to 18, as they cover all quote-related obligations.



15 instances of non-compliance with the Code were recorded as an STC following the 4 robust audit cases that resulted in compliance action. These audits are designed to investigate pre-sales activities with a focus on the online presence of Sellers and the quotes and contracts they have supplied under recent sales. The audits are designed to proactively monitor the presales activity of NETCC Sellers to educate businesses to better comply with the Code; however, repeated instances of non-compliance will result in breaches upheld. If breaches are upheld, Sellers will be required to undertake appropriate remedial actions to retain their status as a NETCC Approved Seller.



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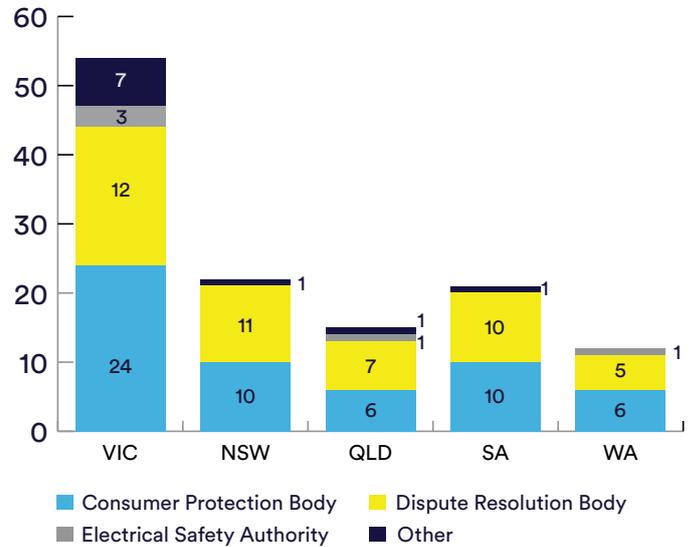


25 instances of non-compliance with the Code were recorded as STCs and breaches following 8 competency audit cases that were finalised under compliance action in Q2 FY25-26. These audit cases were raised in response to the Approved Sellers failing to pass the competency audit questionnaire by scoring less than 80%. Sellers who fail to attempt the questionnaire audit are suspended and expelled if they do not complete the audit within a reasonable timeframe. Most instances of non-compliance with the Code that arise from competency audit cases are due to incorrect questionnaire responses relating to 'Complaints' (complaints handling), 'Contracts' and 'Compliance with the Code' for failure to cooperate or respond to the Code Administrator within given timeframes.

Referrals by region

Referrals are made where incidents are outside the NETCC jurisdiction and cannot be investigated. In these situations, the complainant is provided with the contact information for their relevant consumer protection authority, dispute resolution body or regulator, depending on the nature of the issue. The Administrator cannot act as a dispute resolution body and does not have the jurisdiction to settle commercial, civil, or financial disputes under the Code.

Referral advice was only provided for complainants from five identified states in Q2 FY25-26: Victoria, New South Wales, Queensland, South Australia and Western Australia.

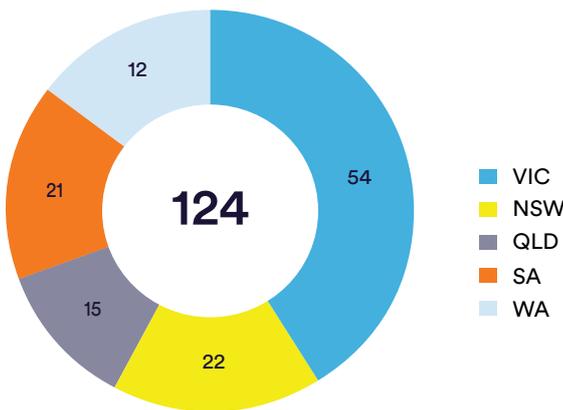


The highest percentage of referral advice was provided to complainants from Victoria at 44% followed by New South Wales and South Australia at 18% and 17% (respectively).

Compliance actions

One Approved Seller was expelled from the NETCC program this quarter. No Approved Sellers were suspended from the NETCC program this quarter.

For more information on current NETCC suspension and expulsion findings, please visit newenergytech.org.au/compliance-activity.



Referrals by state and territory

Of the 124 referral advice notices provided to consumers:

- 56 were for state or territory consumer protection authorities
- 53 were for state or territory dispute resolution bodies
- 5 were for state electrical safety authorities
- 10 other referral notices were sent to other external bodies, such as Solar Accreditation Australia or the Clean Energy Council's Approved Products program.

Connect with us

Report a breach

Help us find Approved Sellers who are in breach of the Code and protect the integrity of the program and consumers. You can anonymously report any suspected breaches of the Code via our online Complaint Form. To learn more about the evidential requirements and supporting documentation: newenergytech.org.au/make-a-complaint

Feedback

The NETCC team welcomes feedback, including how this report can be more effective for you. Please email us at compliance@newenergytech.org.au



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Case study – Acceptance of deposit before supply of a Quote

Quote – General Requirements (clause 9)

The breach

The Code Administrator was made aware of a NETCC Approved Seller who was advertising an offer for a battery system up to 50kWh, fully installed, for \$5,100. To reserve a place in this offer, the consumer was required to pay a \$100 refundable deposit. This payment was taken prior to the provision of a compliant quote being supplied to the consumer.

This conduct has the potential to result in consumer harm due to the stress consumers may be subjected to if they are financially vulnerable (low-income). Consumers cannot be expected to pay a deposit to receive documented information about an offer.

If a consumer sought to obtain several quotes for a new energy tech product or service and was required to pay a refundable deposit in order to access information about the offers, this may impact the consumer's ability to obtain a sufficient number of quotes within adequate timeframes in order to select the most suitable offer.

The financial stress placed on the consumer could be worsened if they face delays in obtaining a refund for opting out of an offer.

NETCC requirements and managing consumer expectations

Clause 9 of the NETCC specifies the written information that Approved Sellers must include in the quote to consumers. It is important that this information is provided to consumers prior to acceptance of the offer, which includes taking any payments. This ensures consumers have adequate information to make an informed decision on whether the offer the Seller is providing is right for them.

Regardless of whether the deposit is refundable or not, the consumer should not be expected to make payment towards the offer without a compliant written quote being provided.

We encourage all NETCC Approved Sellers to review the Code, especially clauses 9 to 18, which cover quoting-related conduct, as well as the Technical Guidance documents we have created to support compliance with NETCC quoting requirements.

Compliance action

After the Code Administrator contacted the Approved Seller to question the practice, the Seller ceased requiring consumers to pay \$100 before providing a quote. The Seller contested that the \$100 payment was not a deposit but rather a way to sort consumers who were "legitimately interested" in the offer. The Code Administrator rejected this argument, finding that consumers were required to make a payment before being provided key information about the offer, and confirmed that the conduct had breached clause 9 of the NETCC.

As part of the remedial actions, the Seller had to provide copies of 3 recent sales agreements for the Code Administrator to review against the quoting requirements of clauses 9-18. The Seller also had to complete a review of its website to remove any references to the \$100 payment requirement.

Recommendations

- NETCC Approved Sellers should ensure they provide consumers with all required information under clauses 9-18 prior to taking a payment (regardless of whether the payment is refundable).
- The Code Administrator has published a series of Technical Guidance documents on best-practice quoting under the NETCC. You can locate these guides [here](#).
- The Administrator also offers a Sales and Installation Agreement template designed to comply with the Code, which can be purchased or obtained free of charge for eligible Sellers.



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Consumer Information Products

The NETCC website contains various [Consumer Information Products](#) to assist consumers with the installation and use of their New Energy Tech.

These products inform consumers how to research their options before purchasing and can help consumers get the most value from their energy system. These free Consumer Information Products were developed in collaboration with Energy Consumers Australia to explain key information to help consumers make informed purchasing decisions. The guides cover:

- Solar
- Battery Storage
- Home Energy Monitoring
- Going off Grid
- Electric Vehicles
- Virtual Power Plants

Technical Guidance Documents

The NETCC website contains [NETCC Technical Guidance Documents](#) to help support businesses comply with the Code. We encourage NETCC Sellers to familiarise themselves with these documents to ensure ongoing compliance. The available technical guidance documents are listed below:

- Photovoltaic Systems
- Battery Energy Storage Systems
- Additional or Retrofitted Battery Energy Storage Systems
- New Energy Tech - General



