New Energy Tech Consumer Code (NETCC) Independent Review

Final Report

June 2026

grids

At PATHMAKER and grids, we respectfully acknowledge the Traditional Custodians of the lands on which we live and work. We recognise their enduring connection to land, waters, skies and culture and pay our respects to Elders past, present, and emerging. We commit to walking alongside First Nations peoples in our shared responsibility to protect the wellbeing of both communities and Country. Their wisdom and stewardship inspire our commitment to creating a more equitable and sustainable future.

Contents

Executive summary 7
1. Context and background 11
1.2 Role of the Code 11
2. About this Review 13
2.1 Review objectives 13
2.2 Scope of this Review 14
2.3 Approach and independence 15
3. Review approach and evidence 16
3.1 Engagement activities 16
3.2 Limitations 17
3.3 Acknowledgement 18
4. Current landscape of CER in Australia 19
4.1 Increasing policy and regulatory activity 19
4.2 Fragmentation and emerging gaps 20
4.3 The role and limitations of voluntary codes 20
4.4 Implications for consumer protection 20
4.5 Positioning the Code 21
5. Stakeholder perspectives 22
5.1 Consumer perspectives 22
5.2 Approved Seller perspectives 24
5.3 Stakeholder perspectives 26
5.4 NETCC Council and Panel 28
5.5 NETCC Administration Team 29
6. Assessment of the Code 31
6.1 Strengths of the Code 31
6.2 Structural and operational weaknesses 31
6.3 Risks if current settings remain unchanged 32
6.4 Assessment findings 33
7. Recommendations 36
8. Implications for the future of the Code 41
8.1 What successful implementation would enable 41
8.2 Risks and opportunities in an evolving CER market 41
8.3 Ensuring the Code remains fit for purpose 41
8.4 Implications for key stakeholder groups 41
Appendix A: Independent Review Terms of Reference 44
Appendix B: Mapping the processes 47
Appendix C: Comparative analysis to other consumer protection schemes 53
Appendix D: NETCC Council and Panel interviews 55

Appendix E: Stakeholder interviews 60
Appendix F: Stakeholder survey insights summary 65
Appendix G: Consumer survey insights summary 69
Appendix H: Approved Seller survey insights summary 77
Appendix I: Reference documents 89

Acronyms and abbreviations

This report uses technical and policy terms. Key acronyms and definitions are provided below, to support clarity and consistency for all readers.

Abbreviation	Definition
ACCC	Australian Competition and Consumer Commission
ACL	Australian Consumer Law
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
AI	Artificial Intelligence
ASIC	Australian Securities and Investments Commission
BECE Reform	Better Energy Customer Experience Reform
CER	Consumer Energy Resources
CER Roadmap	National Consumer Energy Resources Roadmap
DNSP	Distributed Network Service Provider
EV	Electric vehicle
NETCC (the Code)	New Energy Tech Consumer Code
PV	Photovoltaic
SRES	Small-scale Renewable Energy Scheme

Key terms

Term	Definition
Approved Seller	Business accredited under the Code to sell and/or install technologies cover by the Code.
Compliance (NETCC)	Adherence by Approved Sellers to Code obligations across the customer lifecycle
Compliance and Monitoring Panel / NETCC Panel	Appointed governance body responsible for compliance and enforcement decisions
Consumer Energy Resources	Distributed energy technologies owned or operated by consumers, including solar PV, batteries, electric vehicles and energy management systems
Consumer redress pathway	The process by which consumers resolve complaints or disputes, including escalation to ombudsmen or regulators
NETCC Council	The NETCC program is overseen independently by representatives from peak industry and consumer bodies, collectively known as the NETCC Council.
Industry-led governance	A governance model where industry bodies administer frameworks with oversight from independent structures
Scope (of the Code)	The technologies, services and activities covered by the NETCC
Voluntary Code	A non-statutory framework that sets standards for industry conduct but does not replace legal obligations

Executive summary

Australia's energy system is undergoing a rapid structural transition, with consumers increasingly engaging in the purchase and operation of distributed energy technologies such as solar, battery storage and emerging service-based models. This shift is fundamentally changing the role of consumers within the energy system, moving from passive recipients to active participants.

While this transformation presents significant opportunities for decarbonisation and system resilience, it has also introduced new and evolving risks that existing consumer protection frameworks were not designed to fully address.

The New Energy Tech Consumer Code (the Code) was established in response to this challenge, providing a nationally consistent, industry-led framework to lift standards, support responsible conduct and strengthen consumer protections in a rapidly evolving market.

Over time, the Code has expanded in scale and relevance, with a growing number of Approved Sellers and increasing integration into government programs and market settings.

This independent *New Energy Tech Consumer Code Review* (this Review) assesses the effectiveness, relevance and future role of the Code. It considers whether the Code is delivering on its intended objectives and how it must evolve to remain fit for purpose in an increasingly complex Consumer Energy Resources (CER) landscape.

Overall findings

This Review finds that the Code is effective in principle and delivering measurable benefits in practice. It has contributed to lifting industry standards across sales practices, disclosures and customer service, and provides a nationally consistent benchmark in a fragmented and fast-moving market. It is widely recognised as a credible complement to statutory protections, particularly in areas not fully covered by existing regulation.

However, its effectiveness is increasingly constrained by a combination of structural, operational and system factors. These include limitations in governance and mandate clarity, growing pressure on compliance and administrative functions, relatively low consumer awareness, and a broader consumer protection system that remains fragmented. These constraints limit the Code's ability to operate at the scale, consistency and pace required as the market expands.

A central conclusion of this Review is that the role of the Code is transitioning. While originally conceived as a voluntary industry uplift mechanism, it is now increasingly positioned as a more integrated component of consumer protection infrastructure, particularly where it is linked to government incentive programs. This shift has elevated expectations of the Code without a corresponding evolution in its mandate, capability or system positioning.

Market view of consumer protections

Australia's consumer energy resources (CER) market has grown rapidly, with increasing numbers of households and businesses investing in solar, batteries and related technologies. As this market matures, so too are the consumer protection arrangements that support it. However, the consumer experience is not yet consistent or coherent across the customer journey, from initial research and sales through to installation, ongoing performance and redress.

Consumer protections in the CER market are distributed across multiple frameworks, including consumer law, energy regulation, government program requirements and voluntary codes. While each of these mechanisms is evolving, they do not yet operate as a fully integrated system. This can create complexity for consumers and variability in outcomes, depending on the pathway taken, particularly in post-installation contexts, where responsibility may sit across retailers, installers, manufacturers, networks, regulators or program administrators.

The NETCC operates within this broader landscape. The Code plays an important but necessarily bounded role: it can drive improved signatory conduct, strengthen disclosure practices, lift customer service standards and support more effective complaint handling. However, it does not have sole authority to address all consumer harms across the system. Recognising these boundaries is essential to setting realistic expectations about the Code's role, authority and available remedies.

Evidence gathered through this Review including complaints data, stakeholder feedback and consumer research indicates that many of the challenges consumers face are systemic in nature. Even where formal Code breaches are not established, the volume and nature of concerns highlight persistent gaps between consumer expectations and their experiences. These findings inform the recommendations throughout this report, which seek to strengthen the Code's contribution while acknowledging the system-level reforms needed beyond it.

Governance, compliance and operating model

This Review identifies governance as the most significant structural constraint on the Code's effectiveness.

While governance roles are defined, current arrangements lack the clarity, authority and strategic focus required to support consistent and proactive decision-making. As a result, the Code's operation is often reactive rather than forward-looking, particularly in response to emerging risks and system-level issues.

Compliance and administrative functions are also under increasing pressure. Growth in Approved Sellers and complaints has increased workload and complexity, while systems and processes have not fully scaled in response. To respond to demand, the Code relies heavily on a complaints-driven model, limiting its ability to identify risks early and drive proactive improvement across the market. It is noted the growth in volume of complaints is related to the increased number of Approved Sellers as well as growth in CER market.

Meanwhile, industry feedback highlights variability in capability and capacity to meet Code requirements, particularly among smaller operators. While the Code has lifted baseline standards, its value is not always clearly articulated or consistently experienced, which can affect participation and engagement over time.

System positioning and future risks

This Review finds that the Code is operating within a fragmented and evolving ecosystem, where responsibility for outcomes is distributed across multiple institutions.

In this context, the Code is increasingly performing a bridging role, connecting market practice, consumer expectations and policy intent. However, there is no shared understanding of the Code's long-term role within this system, creating ambiguity in expectations and increasing the risk of duplication or gaps.

Such ambiguity is likely to intensify as the CER market continues to evolve with the emergence of new technologies, financing models and service offerings. If not addressed, increasingly strained consumer trust may decline, compliance outcomes may become more uneven, and confidence in voluntary governance mechanisms may weaken.

Conversely, in the absence of the Code, there is a significant risk that consumer protections in this market would become more fragmented and less coordinated, as no alternative mechanism operates at a comparable national scale.

Direction for reform

A clear need to strengthen the Code across several critical dimensions has been identified. This includes clarifying its role within the broader system, strengthening governance and operating capability, improving alignment with government and regulatory frameworks, and enhancing its ability to respond to emerging risks.

There is also a need to shift toward a more proactive and data-led approach, supported by improved systems, processes and resourcing. Meanwhile, the Code must strengthen its visibility and value proposition for both consumers and industry participants, ensuring it functions not only as a compliance mechanism but as a trusted signal of quality and protection.

Importantly, the Code will need to adopt a more structured approach to future scope, ensuring it remains responsive to evolving technologies and market dynamics without becoming overextended or misaligned with regulatory responsibilities.

Conclusion

The Code remains a necessary and valuable component of Australia's consumer protection framework for new energy technologies. It has established a strong foundation and continues to play a critical role in supporting market integrity and consumer confidence.

However, the context in which it operates has changed significantly.

To remain effective, the Code must evolve from a standalone voluntary scheme to a clearly defined, strategically positioned and system-integrated mechanism.

The findings and recommendations in this Review provide a clear pathway for this evolution.

With targeted reform and considered implementation, the Code is well placed to continue supporting the next phase of Australia's energy transition, ensuring that consumer protection, market growth and system integrity progress together.

Summary of recommendations

The recommendations presented in this Review seek to strengthen the Code as a credible, effective and future-ready consumer protection mechanism, capable of operating within an increasingly complex and evolving CER market.

The recommendations amount to 10 interrelated priorities required to support the next phase of the Code's development. These priorities (**Table 1**) reflect the key findings of the Review and provide a practical roadmap for strengthening the Code's performance, alignment and impact.

Table 1 Summary of recommendations

Recommendations	
1. Clarifying strategic role and system positioning	A central priority is to define and communicate the Code's role within the consumer protection ecosystem, including its relationship to regulators, government programs and other mechanisms. Greater clarity will support system alignment, reduce duplication and ensure the Code operates consistently and proportionately within its intended remit.
2. Strengthening value as a best-practice industry standard	The Code should be repositioned as a differentiated, best-practice benchmark, recognising and supporting high-performing industry participants. This will strengthen the Code's value proposition and support ongoing industry uplift, rather than minimum compliance alone.
3. Enhancing alignment with government and regulatory frameworks	Improved coordination with government and regulatory frameworks is required to ensure the Code operates as an integrated component of the CER policy landscape. This includes formal engagement, information sharing and contributing to system-level responses to emerging risks.
4. Establishing a sustainable and scalable operating model	To remain effective, the Code requires a sustainable and scalable operating model, aligned to the size and complexity of the market. This includes reviewing funding arrangements, strengthening governance oversight and ensuring sufficient capability to deliver both proactive and reactive functions.

5. Reinvesting in systems and operational processes	Investment in technology and process improvement is required to reduce administrative burden, increase efficiency and support scalability. This includes streamlining internal systems and participant-facing processes to improve overall performance.
6. Transitioning to a data-led and proactive compliance model	As the CER market continues to grow, there is an opportunity to strengthen the Code's compliance framework to be more proactive and data-driven. This would support earlier identification of emerging risks, more responsive monitoring, and better position the Code administrator to scale its systems and resources to meet increasing demand.
7. Strengthening compliance, audit and assurance functions	The credibility of the Code is closely linked to the strength of its compliance framework. Enhancing audit capacity, improving management of systemic issues and increasing transparency of outcomes will support more consistent and trusted enforcement.
8. Improving consumer awareness and trust	Low consumer awareness limits the impact of the Code. Strengthening the visibility and positioning of the Code as a trusted signal of quality and protection is critical to improving consumer confidence and market effectiveness.
9. Simplifying and strengthening consumer redress pathways	Consumers continue to face challenges navigating complaints processes. The Code should support a clearer, more accessible and coordinated approach to redress, including alignment with ombudsman and regulatory pathways.
10. Managing emerging risks and future scope	As the CER market evolves, the Code requires a structured approach to identifying, assessing and responding to emerging risks, including clear criteria to guide future scope. This will ensure the Code remains adaptive while maintaining clarity of purpose and avoiding overextension.

1. Context and background

The uptake of CER has accelerated rapidly over recent years. Household and small business consumers are increasingly engaging with solar photovoltaics (PV), battery storage, electric vehicles (EVs), smart energy management systems and emerging offerings such as virtual power plants. These technologies are no longer niche products; they are becoming mainstream components of Australia's energy future.

Alongside this growth, the nature of consumer risk has shifted. Purchasing decisions now often involve high upfront costs, complex contractual arrangements, long-term financial assumptions and evolving technical performance.

Consumers are required to navigate an increasingly sophisticated marketplace characterised by multiple intermediaries, incentive programs, bundled products, and varying sales and finance models. Information asymmetries between sellers and consumers remain significant, particularly for first-time or less experienced purchasers, and are amplified where government rebates or time-limited incentives drive rapid market entry.

Evidence from this Review points to persistent risks including misleading or inaccurate marketing, unclear contractual terms, inadequate disclosure of system performance and costs, and weaknesses in complaints handling and redress pathways. Even where no formal Code breach is established, high complaint volumes indicate ongoing difficulties for consumers in understanding their rights, managing disputes, and navigating fragmented resolution processes.

Regulation alone cannot respond quickly enough to emerging products, business models or risk profiles in a fast-moving market. Well-designed voluntary codes can fill gaps between formal regulatory requirements, lift standards beyond minimum legal obligations, and promote consistent, fair practice across a diverse and evolving industry. When supported by credible governance, robust compliance mechanisms and strong stakeholder confidence, voluntary schemes such as the Code can materially improve consumer outcomes while supporting sustainable market growth.

1.2 Role of the Code

The Code is a national, voluntary code of conduct for businesses selling and installing new energy technologies. Authorised by the Australian Competition and Consumer Commission (ACCC), the Code sets higher standards for consumer protection across advertising and sales practices, contractual transparency, customer service, warranties and complaints handling.

Operating alongside existing legislative protections, the Code does not replace Australian Consumer Law (ACL) or jurisdictional energy regulation. Rather, it extends core consumer protection principles into areas not comprehensively covered by traditional energy market regulation, particularly for products such as solar and battery systems that sit outside the scope of energy retail laws.

The Code provides a practical framework tailored to the specific risks and characteristics of consumer energy resources, addressing gaps that would otherwise remain. Beyond its formal standards, it plays a broader market-shaping role.

By creating a single, national benchmark for responsible conduct, the Code promotes consistency across sellers and installers operating in a fragmented market. It supports informed consumer choice by enabling customers to identify businesses that commit to higher standards. It also provides industry with clearer guidance on expectations, helping to lift capability, reduce poor-practice competition, and strengthen reputational trust in the clean energy sector.

At its best, the Code can be a trust-building mechanism supporting consumer confidence in new technologies, reinforcing accountability among Approved Sellers, and contributing to the legitimacy of industry-led governance at a time of significant system change.

Snapshot of the Code

The New Energy Tech Consumer Code (NETCC) is a nationally authorised, voluntary consumer protection framework for Australia's rapidly expanding new energy technologies market. Building on the earlier Solar Retailer Code (2013), the NETCC was formally launched in 2023 to support greater trust, consistency and accountability across an increasingly complex sector.

The Code was developed in response to growing concerns from governments, regulators and consumer bodies regarding the adequacy of consumer protections in the emerging market for solar, batteries and other new energy technologies. In 2019, the Clean Energy Council (CEC), Australian Energy Council (AEC), Smart Energy Council (SEC) and Energy Consumers Australia (ECA) jointly applied to the Australian Competition and Consumer Commission (ACCC) to authorise a new, expanded consumer code framework – the NETCC.

The NETCC is administered by the Clean Energy Council and governed by an independent Council comprising representatives from key industry and consumer organisations, including the Australian Energy Council, Clean Energy Council, Public Interest Advocacy Centre, Energy Consumers Australia, Energy Networks Australia, Renew, and the Consumer Action Law Centre. A separate Code Monitoring and Compliance Panel oversees compliance activities, including monitoring, enforcement and disciplinary actions.

The Code establishes minimum standards across the full customer lifecycle from marketing and sales through to installation, performance, warranties and complaints handling. It applies nationally and covers a growing range of technologies, products and business models within the consumer energy market.

The NETCC is designed to:

- strengthen consumer confidence in new energy technologies
- improve market integrity and standards of conduct
- establish consistent expectations for businesses operating across jurisdictions

The Code was first authorised by the ACCC in 2019 and is currently undergoing reauthorisation. As at June 2026, the NETCC includes approximately 2,020 Approved Sellers operating across Australia, representing continued growth in participation.

As the market has expanded, complaint volumes have increased in both absolute and relative terms. Reported complaints grew from 168 in 2023 to 445 in 2025, indicating a rising proportion of Approved Sellers subject to complaints and placing increasing pressure on compliance and monitoring functions.

Since early 2026, the Code Monitoring and Compliance Panel has undertaken a range of enforcement actions, including suspensions and expulsions of Approved Sellers. These activities reflect the Code's role in identifying and responding to non-compliance, while also highlighting the resourcing and scalability challenges associated with a largely complaints-driven compliance model.

2. About this Review

This Review has been commissioned to assess the effectiveness, relevance and future role of the Code in supporting consumer protection and industry standards within Australia's evolving consumer energy market.

In line with the approved Terms of Reference (**Appendix A**), this Review responds to the need for a comprehensive, system-level and evidence-based assessment of the Code, including:

- The extent to which the Code is achieving its intended consumer and market outcomes
- Its effectiveness in protecting consumers and supporting quality industry practices
- Its value proposition and operational impact for participating businesses
- The effectiveness of its governance, oversight and administrative arrangements
- Its role, positioning and alignment within a broader and evolving regulatory and policy landscape
- Its adaptability and future readiness in response to emerging risks, technologies and market change.

This review has been explicitly designed to consider the Code within the full ecosystem of consumer energy, recognising that its impact is shaped not only by its internal operation, but also by how it interacts with:

- Government policy and program delivery
- Regulatory frameworks and consumer law
- Industry practice and market incentives
- Consumer behaviour and expectations.

This system-oriented perspective is consistent with the intent of the Terms of Reference and reflects the Code's cross-cutting role within the energy transition.

2.1 Review objectives

This Review is structured as a diagnostic assessment of the performance, role and future positioning of the Code, grounded in the core questions set out in the Terms of Reference. The assessment is directed at determining:

- Whether the Code is operating in accordance with its intended objectives
- The extent to which it remains credible, effective and proportionate within the market context
- How well it is positioned to respond to evolving market conditions, emerging technologies and associated consumer risks.

To support this assessment, this Review is structured across five core analytical domains:

1. Consumer outcomes
2. Industry participation and compliance
3. Governance and oversight effectiveness
4. System alignment and regulatory interaction
5. Adaptability and future readiness.

These domains reflect the principal areas of inquiry established through the Terms of Reference and provide a coherent framework for evaluating the Code's performance and ongoing relevance.

Assessment across these domains is guided by a set of explicit review principles, derived from the methodology outlined in the original proposal (**Figure 1**). These principles ensure that findings are analytically robust, grounded in available evidence, proportionate, reflecting the role of the Code as a voluntary scheme and practically oriented, supporting actionable recommendations.

Figure 1 NETCC Review 2026 Principles

2.2 Scope of this Review

The scope of this Review has been defined to ensure a focused, proportionate and actionable assessment, aligned to the Terms of Reference and the remit of the Code as a voluntary consumer protection mechanism.

In scope
This Review considers:

- The operation and impact of the Code across new energy technologies, including solar PV, battery systems and related consumer-facing energy solutions
- Signatory behaviour and performance, including compliance trends, audit outcomes, complaints data and participation patterns
- The effectiveness of governance and administrative arrangements, including the roles of the NETCC Council, Review Panel and Administrator
- The interaction of the Code with the broader policy and regulatory environment, where relevant to assessing alignment, complementarity and future positioning.

Out of scope
This Review does not:

- Redesign or expand enforcement powers beyond those available within a voluntary Code framework
- Replace or replicate the role of statutory consumer protections, regulators or ombudsman schemes, or assess their performance beyond their interface with the Code
- Undertake a formal legal compliance audit of individual businesses, beyond analysis of available Code compliance and audit records.

These boundaries ensure this Review remains focused on matters within the reasonable influence of the Code, consistent with the intent of the Terms of Reference and proportionate to the role of the Code within a multi-layered consumer protection system.

2.3 Approach and independence

This review was conducted by PATHMAKER and grids as an independent reviewer, with responsibility for designing and delivering the assessment, interpreting evidence, and forming independent judgements. While the Clean Energy Council supported access to documentation, data and stakeholders, it did not direct the findings or conclusions of this Review.

The relationship between the review team, the Clean Energy Council and the NETCC Administration team was structured to balance independence with practicality. The NETCC Administration team facilitated access to relevant records, compliance data and stakeholder contacts, while remaining at arm's length from analytical judgements and recommendations.

The review adopted an evidence-led approach, drawing on:

- Code compliance, audit and complaints data
- Desktop analysis of Code documentation and publicly available regulatory, policy and market materials
- Feedback captured via the consultation process, which included a survey, interviews, a focus group and data provided by stakeholders.

Quantitative indicators were used where available, supported by qualitative insights to understand practical operation, lived experience and system dynamics. Judgement was applied transparently, with findings framed to reflect both strengths and limitations in the available evidence. Emerging themes were tested across multiple sources to avoid reliance on isolated data points.

This approach was designed to ensure conclusions and recommendations are robust, proportionate and grounded in the realities of operating a voluntary, industry-led consumer protection framework within a fast-changing market.

3. Review approach and evidence

This Review drew on multiple complementary sources of evidence to provide a balanced, robust and well-grounded assessment of the operation and effectiveness of the Code.

A comprehensive desktop review was undertaken to establish a baseline understanding of the Code's design, intent and implementation. This included analysis of relevant documentation, complaints and case data, compliance and audit records, governance materials, policy frameworks, and publicly available regulatory and market information. This ensured a structured foundation for assessing both the intended operation of the Code and its performance in practice.

Such analysis was complemented by a program of targeted engagement activities, designed to capture lived experience, system perspectives, and practical insights into the implementation and impact of the Code across the consumer energy ecosystem.

Findings were tested across multiple evidence sources and stakeholder perspectives, strengthening confidence that conclusions were not based on any single dataset or viewpoint.

Where appropriate, comparative and contextual benchmarking was applied to consider the Code alongside other consumer protection mechanisms and voluntary governance frameworks. This supported assessment of the Code's proportionality, alignment with broader regulatory structures, and future readiness in a rapidly evolving market context.

3.1 Engagement activities

Engagement activities were designed to capture a broad and balanced range of perspectives across the consumer energy ecosystem, recognising the diverse roles and experiences that shape the Code's operation and outcomes.

A range of perspectives were sought and considered, including from:

- Consumers and prospective users of new energy technologies
- Approved Sellers and non-signatory market participants
- Code governance and administrative representatives (Council, Review Panel and Administrator)
- Government agencies, regulators and ombudsmen
- Consumer advocates, industry bodies and sector networks.

Participation in the engagement was encouraged via NETCC and Clean Energy Council communication channels including newsletters, website and social media (**Figure 2**). Stakeholders were also invited to share information with their networks to increase awareness and participation.

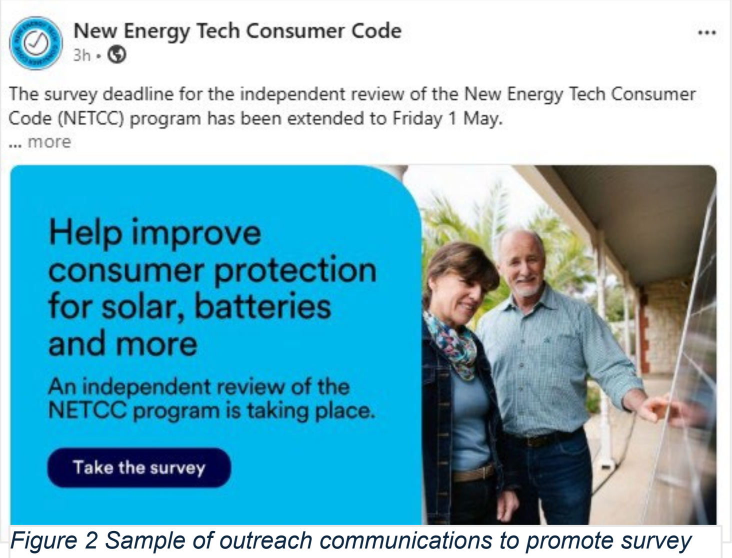

Figure 2 Sample of outreach communications to promote survey and opportunities to provide feedback.

A mixed-method engagement approach was adopted, comprising:

- Structured surveys (consumer, Approved Seller and stakeholder)
- In-depth interviews (Council and Panel members, external system stakeholders)
- Workshops and targeted discussions.

This multi-channel approach (**Figure 3**) enabled participation that reflected stakeholder expertise, role and availability, while supporting both breadth (via surveys) and depth (via interviews and qualitative engagement).

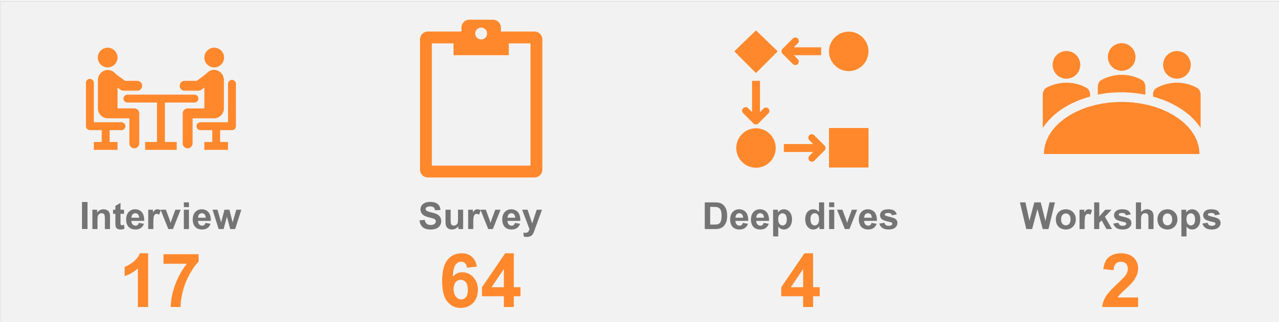

Figure 3 Summary of engagement activities

The engagement program was designed to ensure the capture of operational ("on-the-ground") and system-level perspectives from participants with varying levels of familiarity and engagement with the Code. A diverse range of perspectives – from supportive to critical – were deliberately sought to reduce the risk of bias and strengthen the evidence base.

3.2 Limitations

As with any review of this nature, the assessment was undertaken within defined data and evidence constraints. This Review relied on available complaints, compliance and audit data, which vary in scope, consistency and maturity across the lifecycle of the Code. Accordingly, not all consumer experiences have been fully quantified, and some improvements or trends may not yet be reflected in available datasets.

The engagement program also reflects self-selected participation. While efforts were made to ensure diversity of input, findings may not fully capture all perspectives across the market. In several areas, professional judgement was required to interpret incomplete or mixed evidence, particularly where qualitative insights pointed to emerging or systemic issues not yet visible in quantitative data.

These limitations were addressed by:

- Using multiple evidence sources to validate findings
- Careful cross-checking of findings across stakeholder groups
- Cautious interpretation of results
- Transparent articulation of assumptions and constraints.

Findings and recommendations have been framed to reflect the strength of evidence, proportionality of issues identified, and practical considerations for implementation.

3.3 Acknowledgement

This Review has been undertaken in the context of significant and ongoing transition within the consumer energy sector, including parallel policy, and regulatory and market developments that are shaping the Code's future role.

At the time of publication, the Code is progressing through a reauthorisation process with the ACCC. Matters directly related to this process, including formal determinations on authorisation conditions or scope, were therefore considered outside the scope of this Review. This ensures that the Review remains appropriately focused and does not pre-empt or duplicate the role of the ACCC.

This Review has also been undertaken alongside the continued development of the National Consumer Energy Resources Roadmap (CER Roadmap), which signals further reform in consumer protections, including anticipated changes through to 2027.

While these developments have informed the context of this Review, findings and recommendations have been intentionally framed to remain robust under a range of potential future regulatory scenarios, rather than dependent on any single policy pathway. The alignment between the Code and these broader reforms will be critical to ensuring the Code remains effective, credible and fit-for-purpose as the energy transition progresses.

4. Current landscape of CER in Australia

Australia's CER landscape is undergoing significant transformation, driven by rapid technological uptake, policy reform and increasing system complexity. Distributed technologies including rooftop solar, batteries, EVs and emerging service models such as virtual power plants are reshaping the role of consumers in the energy system and introducing new risks and opportunities.

4.1 Increasing policy and regulatory activity

In response, governments and regulators have initiated a range of reforms aimed at strengthening consumer protections and supporting integration across the CER ecosystem (**Figure 4**). These include:

- Enhancements to Australian Consumer Law (ACL) enforcement and increased focus on misleading conduct, contract clarity and unfair business practices in new energy technology markets
- Ongoing development of Consumer Energy Resources (CER) policy frameworks, including the National Consumer Energy Resources (CER) Roadmap
- Expanded roles for regulators and scheme administrators in overseeing technology deployment, standards and program delivery
- Increased reliance on government incentive programs and market mechanisms, accelerating uptake while introducing more complex consumer decision-making environments.

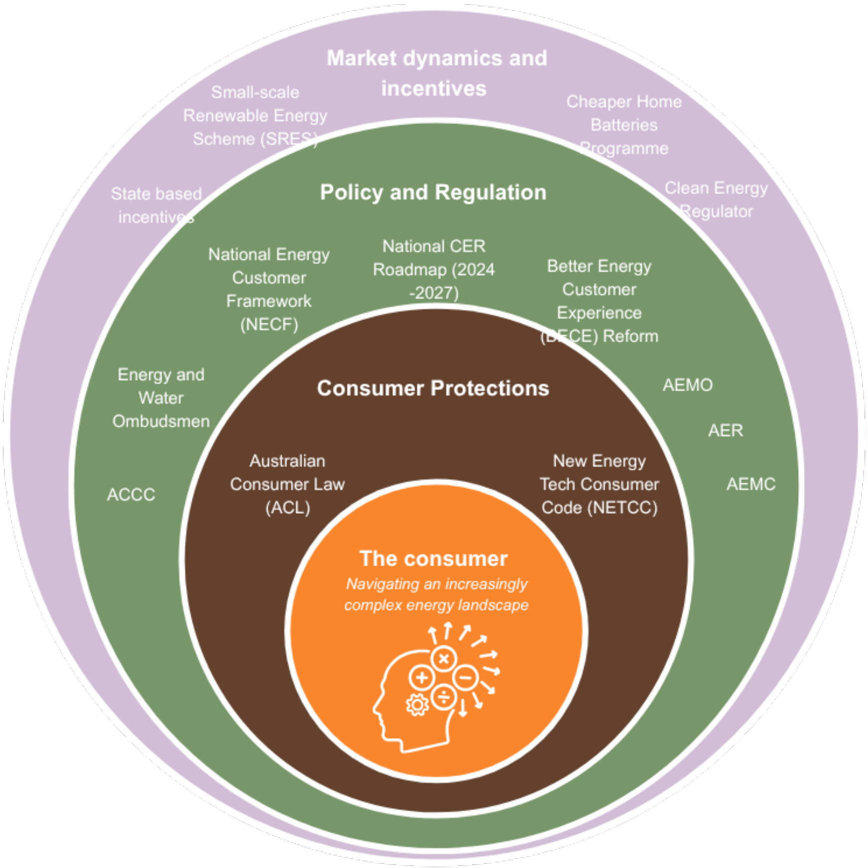

Figure 4 Representation of the CER ecosystem

4.2 Fragmentation and emerging gaps

Despite this progress, consumer protections in the CER market remain fragmented and unevenly applied. Consumer protection responsibilities are distributed across multiple frameworks including ACL, energy regulation, government programs, technical standards and voluntary codes that operate alongside each other but do not form a unified, end-to-end system.

Regulatory reviews reinforce this structural gap. The Australian Energy Regulator (AER) has identified that existing frameworks are unlikely to adequately capture emerging CER-related services, while the ACCC has highlighted the increasing complexity of consumer offerings and the need for stronger protections. At the same time, reforms such as the CER Roadmap are still being developed and implemented across multiple workstreams.

This results in several persistent system challenges:

- Uneven coverage across products and services, particularly for newer or bundled offerings
- Diffuse accountability, with multiple actors involved in delivering consumer outcomes
- Unclear consumer pathways, particularly for complaints and escalation
- Program-driven market expansion, increasing participation faster than protections are maturing
- Jurisdictional variation, creating inconsistency in how protections are applied.

Taken together, these factors mean that, while protections are improving, they are not yet coherent or consistently experienced across the consumer journey.

4.3 The role and limitations of voluntary codes

Within this landscape, voluntary, industry-led mechanisms such as the Code play a critical gap-filling role. The Code has contributed to lifting baseline standards across sales practices, disclosures and customer service, particularly in areas not comprehensively covered by legislation. Its national scope provides a degree of consistency in an otherwise fragmented system. However, the effectiveness of voluntary codes is structurally constrained by:

- Scope of participation, with protections limited to Approved Sellers
- Strength of mandate, with enforcement mechanisms not equivalent to statutory regulation
- System integration, with limited alignment to emerging policy and regulatory frameworks.

As a result, voluntary codes are necessary but not sufficient. They cannot, on their own, deliver consistent consumer protection outcomes across a rapidly expanding and diversifying market.

Interviews and survey responses from Approved Sellers consistently indicated that participation in the Code is often driven by eligibility requirements linked to government incentive programs. This is supported by the profile of Approved Sellers, with more than half based in Victoria, many of whom operate nationally.

4.4 Implications for consumer protection

The market conditions described in this Review create a transitional consumer protection environment. While reforms are directionally strong, they are being implemented incrementally and across multiple institutions. A fully integrated framework has not yet emerged. The key implications are:

- Gaps across the consumer lifecycle, particularly in emerging services and post-sale phases
- Reliance on voluntary mechanisms to address risks beyond the reach of current regulation
- Uncertainty in roles and responsibilities as reform processes continue to evolve
- Increasing consumer exposure, as participation in CER markets accelerates.

The current system therefore reflects progress, but not yet coherence. Consumer protections are improving, but not consistently or at the scale required to fully support the pace of the energy transition.

4.5 Positioning the Code

Against this backdrop, the Code is well positioned to play a central and enabling role within Australia's consumer protection framework for CER. As a nationally consistent, industry-led mechanism, the Code operates at the intersection of market practice, consumer protection and policy implementation. It effectively acts as a bridge between fragmented frameworks and real-world consumer experience.

In practice, the Code is performing a role beyond its original design, functioning as a de facto integrator of standards across parts of the consumer journey where formal protections are not yet fully aligned. However, its ability to sustain this role is constrained by:

- Unclear mandate, with no shared understanding of its long-term role in the system
- Limited alignment with evolving reforms, creating risk of duplication or gaps
- Capacity constraints, as expectations increase with market growth.

To remain effective, the Code will need to transition from a stand-alone voluntary standard to a more clearly embedded component of the broader consumer protection system. This will require:

- Clear articulation of its strategic role and value proposition
- Stronger alignment with government programs and regulatory frameworks
- An operating model capable of delivering consistent outcomes at scale.

With this evolution, the Code is well placed to continue supporting consumer protection and market integrity. Without it, its impact risks being constrained as the system continues to develop around it.

5. Stakeholder perspectives

The findings of this Review are informed by a broad and deliberate engagement process, capturing perspectives from consumers, Approved Sellers, regulators and system stakeholders across the CER ecosystem.

Through interviews, surveys, workshops, complaints analysis and submissions, this Review has sought to understand how the Code is experienced in practice, where it is delivering value, and where gaps or pressures remain.

This section summarises the key stakeholder insights that have shaped the assessment and recommendations in this Review.

5.1 Consumer perspectives

This section presents the consumer perspective on the Code, drawing on survey responses, complaints data and insights from consumer advocates. It focuses on how the Code is experienced in practice across the customer journey, including levels of awareness, decision-making, and post-sale interactions. These insights provide a critical view of where consumer protections are perceived to be working, where gaps persist, and how effectively the Code supports trust, understanding and resolution when issues arise.

Awareness and understanding of the Code

Evidence indicates that consumer awareness of the Code is limited and inconsistent, particularly at the point of purchase. Where awareness exists, it is often retrospective, with consumers identifying the Code only after experiencing an issue or engaging with complaints processes, rather than using it as a proactive decision-making tool.

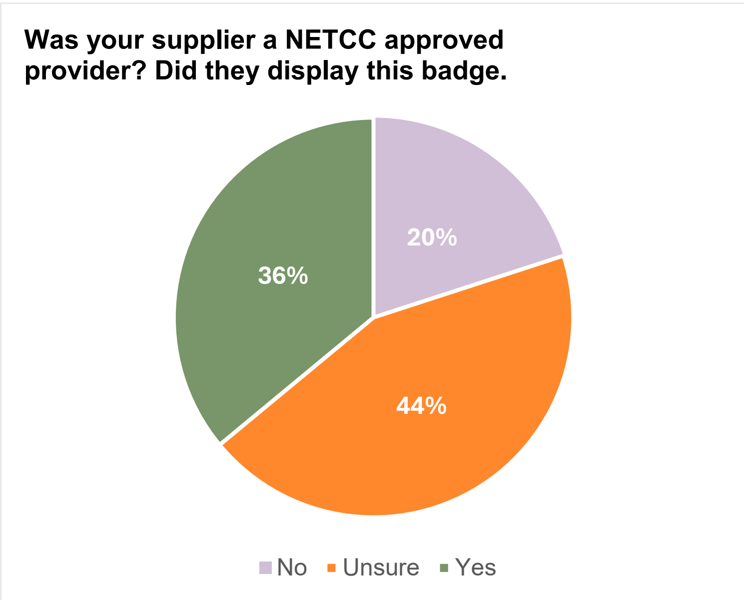

Figure 5 Survey responses to question "was your supplier a NETCC approved supplier."

Experiences with sales, installation, complaints and redress

Insights from Code complaints data shows that consumer dissatisfaction most frequently arises during post-sale interactions, particularly in relation to customer service, complaint handling and escalation.

A significant proportion of complaints reflects:

- Unclear responsibility for issue resolution across providers, installers and third parties

- Limited transparency in complaint handling processes
- Confusion regarding escalation pathways and available avenues for redress.

Submissions from ombudsman bodies and consumer advocates reinforce that the system can be difficult for consumers to navigate, particularly where Code processes intersect with external dispute resolution schemes or regulatory frameworks.

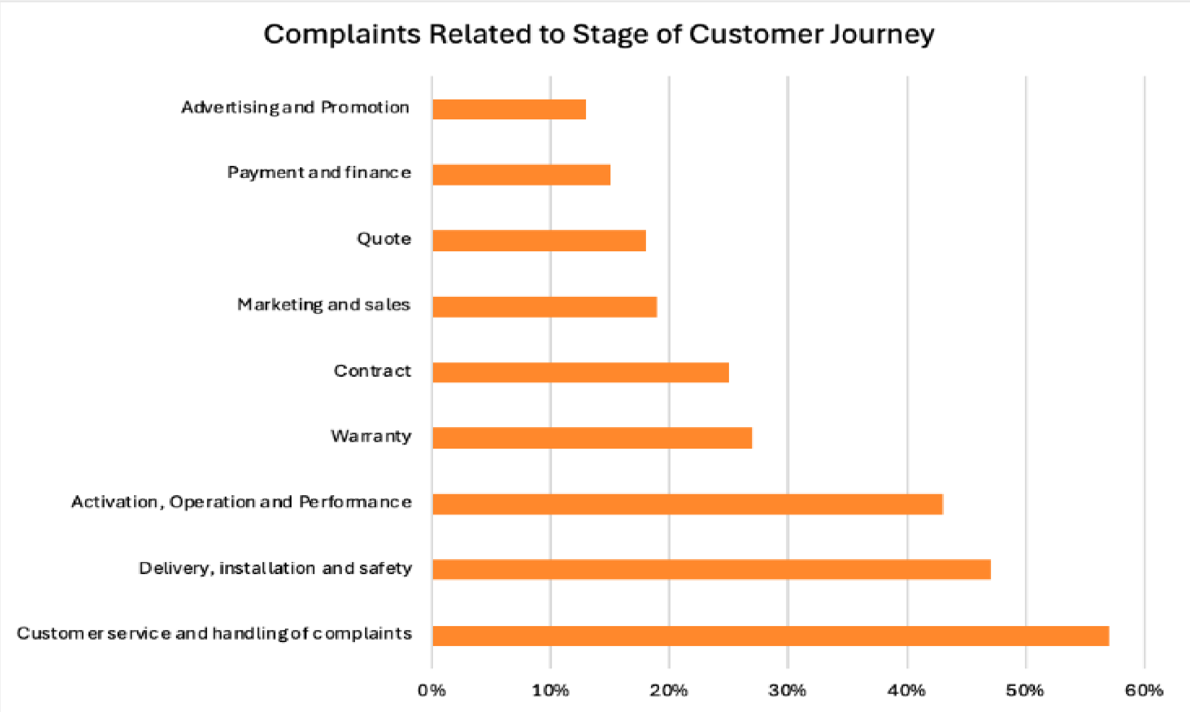

Figure 6 Code case outcomes since 2023. Source NETCC reporting

What is working and where consumers feel exposed

Consumers and advocates identify the Code as a credible marker of expected conduct and acknowledge its role in lifting standards across parts of the market. However, perceived protection is partial and conditional, rather than comprehensive.

Consumers continue to report exposure to risks including:

- Misleading or overly complex sales practices
- Inadequate or unclear contractual terms and disclosures
- Limited understanding of complaint escalation and resolution pathways.

These issues reinforce a perception that consumer protections are not consistently experienced across the full customer journey.

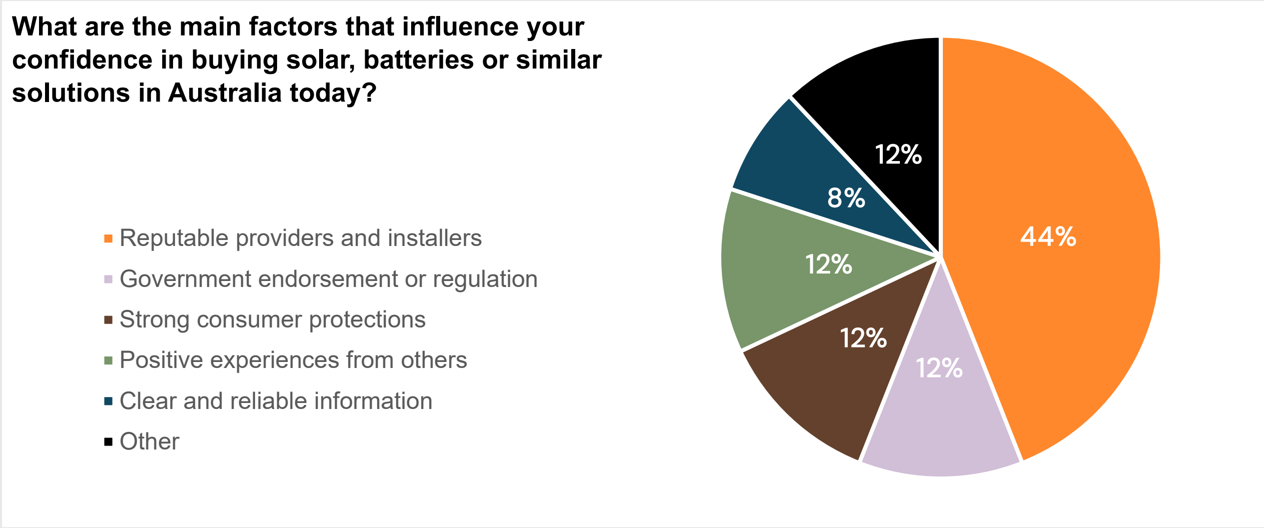

Figure 7 Survey responses to question "what factors influence your confidence."

"The Code needs more stringent rules and background checks and to act faster to protect consumers. Too many stories of people caught out by bad installers that should have never been allowed to provide battery and solar," **Consumer survey respondent.**

Consumer survey insights summary is in Appendix G.

5.2 Approved Seller perspectives

This section reflects the perspectives of Approved Sellers, based on survey responses and engagement throughout the Review. It examines how the Code is experienced as an operational and compliance framework, including its role in shaping business practices, influencing participation, and contributing to market standards. These insights highlight both the practical value of the Code and the challenges associated with implementation, particularly in relation to compliance burden, capability and perceived incentives.

Value of the Code for raising standards

Industry participants broadly recognise the Code as having lifted baseline standards across sales, marketing and customer service practices. For many Approved Sellers, the Code provides:

- A structured framework for internal processes and compliance
- A mechanism to demonstrate commitment to responsible conduct
- A reference point for industry consistency in a fragmented market.

"Without being attached to government rebate there is no advantage to being a signatory," **Approved Seller survey respondent.**

Figure 8 Approved Seller survey responses when asked "what were the main reasons to join NETCC"?

Compliance burden, capability gaps and incentives

Meanwhile, evidence from engagement indicates that compliance is resource-intensive, particularly for smaller organisations. Challenges are concentrated in:

- Complaint handling and documentation processes
- Interpretation and application of Code requirements
- Administrative burden associated with compliance and reporting.

These issues are generally attributed to capability and capacity constraints, rather than deliberate non-compliance.

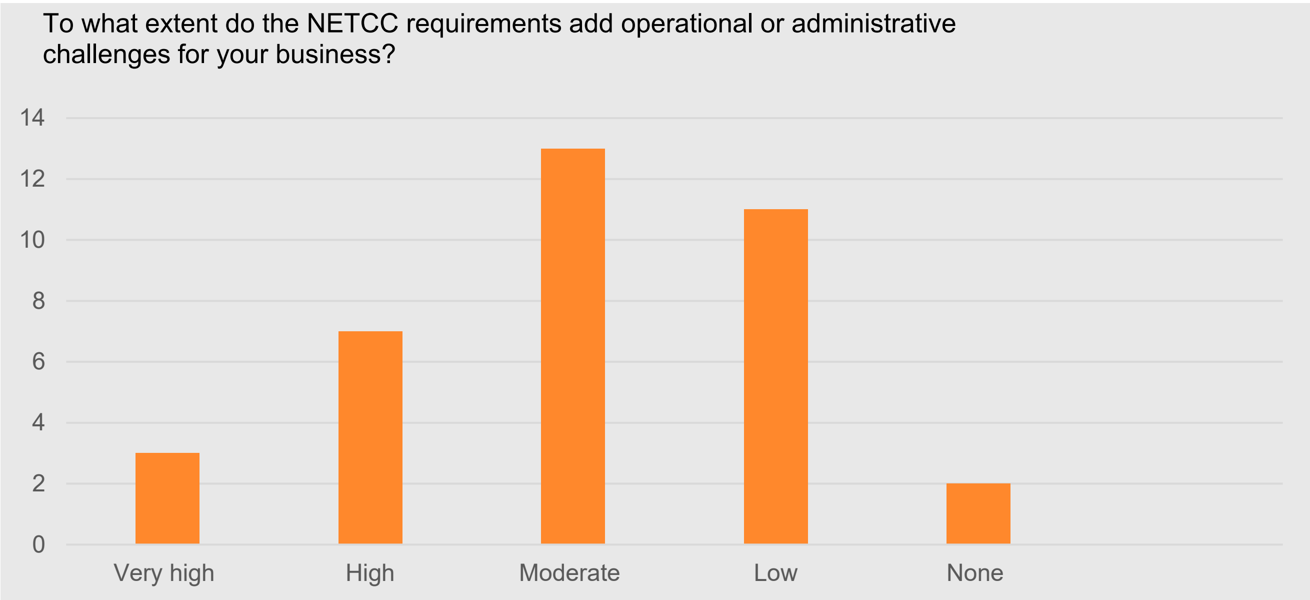

Figure 9 Response from approved sellers when asked "to what extent do NETCC requirements create burden".

Perceived value is a key driver of participation. Where benefits – commercial, reputational or operational – are unclear or unevenly realised, confidence in the scheme can diminish.

"Other companies not having to comply, regulatory burden – we basically need to be lawyers to comply fully," **Approved Seller survey respondent.**

"Less tick and flick approving low-end operators and more actual due diligence at the approval stage is required," **Approved Seller survey respondent.**

Challenges for small versus large operators
Differences in capacity and capability shape how the Code is experienced across the market. Small and medium operators emphasised:

- Resourcing constraints
- Administrative burden
- Difficulty meeting compliance expectations alongside business operations.

Larger operators focused on:

- The need for consistency and fairness in compliance and enforcement
- Risks of competitive disadvantage where standards are not applied uniformly.

These differences highlight the need for a system that is both equitable and scalable across a diverse participant base.

"Too much legal mumbo jumbo in contract requirements – should be simplified," **Approved Seller survey respondent.**

"It is impossible to provide all the documentation required and still operate viably," **Approved Seller survey respondent.**

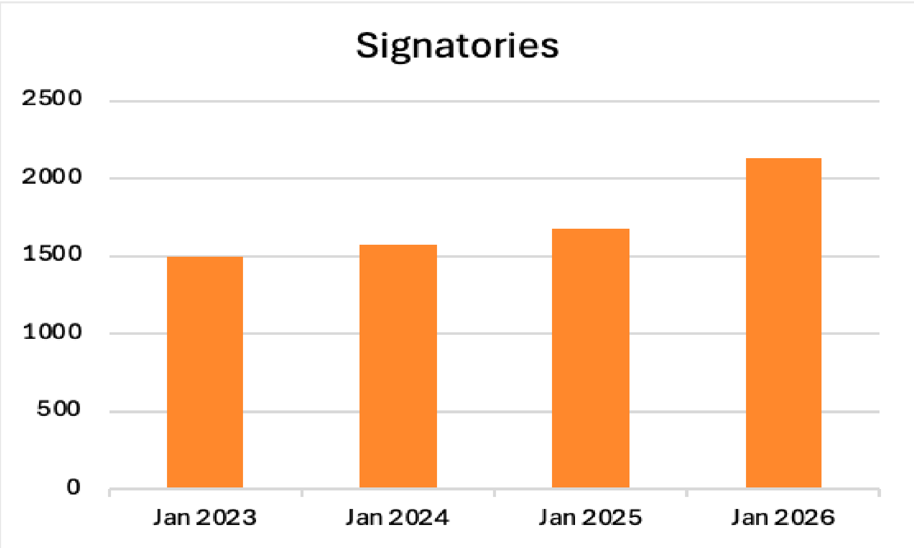

Figure 10 Number of Approved Sellers. Approved Sellers have risen from 1,500 in 2023 to 2,131 by 2026, with around half based in Victoria but active nationwide.

Approved Seller survey insights summary is in Appendix H.

5.3 Stakeholder perspectives

This section captures views from regulators, government departments and agencies, and broader system stakeholders who engage with the Code from outside its governance and operations. It provides a system-level perspective on the role, credibility and effectiveness of the Code within the wider consumer protection framework. These insights are particularly important in understanding how the Code interacts with regulatory settings, where it adds value, and where limitations in mandate, enforcement or system alignment may constrain its impact. A list of the stakeholders included is provided in **Appendix E**.

Confidence in the Code as a consumer protection mechanism
Regulators and consumer advocates generally view the Code as a credible and necessary complement to statutory protections. It is seen as playing an important role in:

- Extending protections into areas not fully covered by existing regulation
- Supporting baseline standards across emerging technologies and services
- Contributing to consumer confidence in a complex market.

"The Code is a targeted scheme for these technologies providing consumers a clear pathway to raise complaints," **Stakeholder interview participant.**

"The Code plays a useful role in providing confidence to government where there isn't an obvious regulatory mechanism that applies," **Stakeholder survey respondent.**

"Because there aren't other specific tools and the ACL [Australian Consumer Law] is generic the NETCC remains necessary. Additionally, ombudsman schemes jurisdiction is generally limited," **Stakeholder interview participant.**

"I think it's partway there. It's definitely a higher standard than consumer law requires," **Stakeholder interview participant.**

Observations on governance, enforcement and credibility

Stakeholders consistently link the effectiveness of the Code to the strength of its governance and compliance arrangements.

Key observations include:

- Confidence is stronger where compliance and enforcement signals are clear and consistent
- Perceived limitations in governance, resourcing or enforcement can reduce confidence in outcomes
- Challenges are understood as issues of implementation and system capacity, rather than flaws in the concept of the Code itself.

"The dispute resolution continues to be a gap… especially consumers who have paid via transfer so have no redress," **Stakeholder interview participant.**

"There needs to be greater consequence and accountability when standards are not met," **Stakeholder interview participant.**

"Consumers are often bounced from body to body because no one quite has jurisdiction. This is the benefit of a national code," **Stakeholder survey respondent.**

Expectations for the Code's future role

There is a clear expectation that the Code will need to play a more defined and strategically aligned role as the CER market continues to expand. Stakeholders emphasised the need for:

- Stronger alignment with government programs and regulatory reforms
- Greater clarity regarding the Code's position within the broader consumer protection system
- Increased capability to support emerging risks and market developments.

This reflects a shift from viewing the Code as an industry uplift mechanism toward a more integrated system function.

"Strengthen compliance and it's important to address criticisms that it's just a 'tick' on paper," **Stakeholder interview participant.**

"There's real value in the intelligence the Code has — the challenge is how that information is shared and acted on," **Stakeholder survey respondent.**

"I'd like to see it expand, or more strongly enforce customer protections around sales, including banning door knocking and telemarketing. We have worked hard to reduce predatory sales practices, but they continue," **Stakeholder survey respondent.**

Stakeholder interview insights are in Appendix E and stakeholder survey insights are in Appendix F.

5.4 NETCC Council and Panel

This section draws on insights from members of the NETCC Council and Code Monitoring and Compliance Panel, who are directly responsible for governance, oversight and enforcement of the Code. It provides an internal perspective on how the Code is functioning in practice, including its strategic role, governance effectiveness and operational challenges. These findings offer a critical lens on how the Code is positioned, how decisions are made, and how well current arrangements support consistent and credible outcomes at scale.

Perceptions of the Code's role and value

Council and Panel members consistently view the Code as a necessary and valuable mechanism within the consumer energy ecosystem, particularly as a pragmatic response to gaps in formal regulation. The Code is seen as having played a critical role in:

- Providing a baseline level of consumer protection in a rapidly evolving and previously under-regulated market
- Supporting more consistent sales practices and industry behaviour
- Enabling governments to increase confidence in emerging technologies and delivery models.

The Code is widely understood as an enabling and complementary mechanism, rather than a substitute for statutory regulation.

"It's not the ideal solution, but it is a valuable layer of consumer protection in the absence of formal regulation," **Interview participant.**

Observations on governance, enforcement and credibility

Council and Panel members expressed strong confidence in the internal governance of the Code, particularly in relation to the independence and professionalism of the Panel and the integrity of decision-making processes.

However, perceptions of the Code's effectiveness are closely linked to external expectations and system conditions, rather than governance alone. Key observations include:

- Confidence is shaped by the clarity and consistency of enforcement decisions, particularly in high-risk or high-impact cases
- The Code's effectiveness is constrained by its non-statutory nature, particularly where enforcement outcomes have significant commercial consequences
- There is an enduring tension between the "support to comply" approach and expectations for stronger enforcement.

"The second we suspend or expel them [Approved Sellers], we lose the ability to help their customers," **Interview participant.**

"Expelling someone in some states has huge consequences, and we don't have the same protections that a regulator has," **Interview participant.**

External credibility is also influenced by perception, with the Code often viewed as industry-led despite internal safeguards.

Expectations for the Code's role within the system

There is a shared view among Council and Panel participants that the Code is increasingly operating within a more complex and demanding system environment, with expectations extending beyond its original intent. Members highlighted:

- Growing reliance on the Code as a de facto assurance mechanism within government programs
- Increasing expectations that the Code will address broader consumer harm and system gaps

- Ongoing ambiguity regarding the Code's role relative to regulators, ombudsmen and consumer protection frameworks.

"It's really become a minimum standard — and that wasn't the original intent," **Interview participant.**

There is a clear expectation that the Code will need to adopt a more clearly defined and strategically positioned role within the system.

Expectations for future development and operation

Council and Panel members emphasised the need for the Code to evolve in response to both market expansion and changing system expectations. Key areas for development include:

- Clarifying the role of the Code within the broader consumer protection system, including its boundaries and limitations
- Rebalancing activity to support proactive industry uplift, in addition to reactive complaints and compliance work
- Strengthening mechanisms that support scalable improvements in industry capability and practice
- Maintaining a disciplined approach to scope expansion, particularly in relation to emerging technologies and service models.

"The code was designed to lift industry capability, but the volume of complaints has pulled a lot of focus into reactive work," **Interview participant.**

"Just because we can add something to the Code doesn't mean we should," **Interview participant.**

Strategic perspective on the Code's evolution

Taken together, Council and Panel perspectives reflect a shift from viewing the Code primarily as a voluntary industry uplift mechanism, towards recognising it as a more integrated and system-critical component of consumer protection.

However, there is also clear recognition that this transition introduces structural tensions, including:

- Voluntary design versus mandatory application
- Uplift versus enforcement expectations
- System coordination without formal regulatory authority.

"Consumers just don't know where to go," **Interview participant.**

These dynamics highlight the need for a more explicit articulation of the Code's role, boundaries and value within the evolving energy system, to ensure it remains credible, effective and sustainable.

Council and Panel interviews insights summary is in Appendix D. A workshop was also held with Council and Panel members in April 2026.

5.5 NETCC Administration Team

This section reflects the experience of the NETCC Administration Team, responsible for the day-to-day operation of the Code, including applications, compliance monitoring, complaints handling and stakeholder engagement. It provides an operational perspective on how the Code is delivered in practice, including strengths in process execution and emerging pressures associated with growth in participation and complaints. These insights are critical in understanding the capacity, systems and resourcing required to sustain and strengthen the Code's effectiveness over time.

The NETCC Administration Team undertakes functions to support the administration of the Code, such as:

- Assessing applications for retailers who want to become Code Approved Sellers
- Monitoring and audits of Approved Sellers to ensure they continue to meet Code obligations

- Complaints handling and mediation between consumers and Approved Sellers
- Annual renewals of Approved Sellers to the scheme
- Creating guidance documents such as technical guides for Approved Sellers and public reporting of Code statistics and case studies.

Overall, processes are carried out effectively by a skilled team within the organisation. They are diligent in assessing applications and communicating to applicants where improvements must be made, meditating complaints in a timely manner, and conducting audits.

Over time there has been an increasing volume of Approved Sellers and complaints for the team to process (**Figure 11**). This has created a resourcing strain.

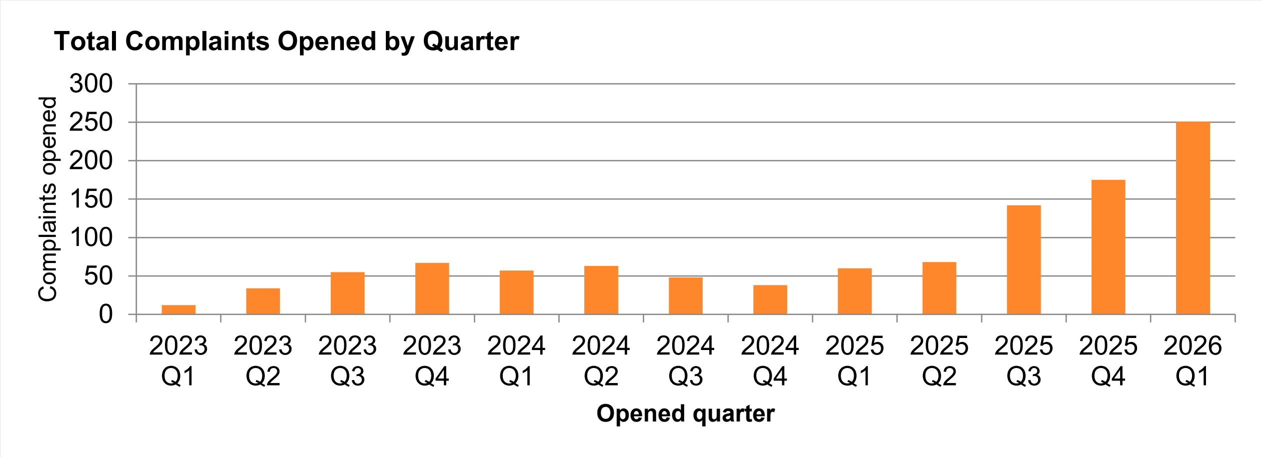

Figure 11 Total complaints opened by quarter

As the CER market has expanded, the Code administrator's systems and operational processes have not kept pace with demand. The team's time is predominantly spent on manual application and complaint processes, constraining its ability to focus on the proactive functions that would most strengthen the Code such as compliance audits, development of guidance materials and proactive engagement with Approved Sellers. Investing in improving systems and processes and assessing resourcing requirements will unlock greater output from the team, leading to stronger outcomes and a stabilised operating environment.

A full review of the processes administered by the NETCC Administration Team is in Appendix B.

6. Assessment of the Code

This Review finds that the Code remains effective in principle and valuable in practice. It provides a nationally consistent framework that supports consumer protections in areas not comprehensively covered by traditional energy regulation, and it is broadly aligned with the intent of ACL.

The Code's impact, however, is increasingly constrained by structural and operational factors. These include governance limitations, resourcing pressures, system fragmentation and lack of mandate clarity. Together, these constraints reduce the Code's ability to operate with the scale, consistency and pace required in an expanding and increasingly complex CER market.

A key finding of this Review is that the Code is being positioned particularly through its relationship to government programs, as a more system-critical consumer protection mechanism than originally intended. This shift has elevated expectations of the Code without equivalent evolution in strategic mandate, capability and operating model.

6.1 Strengths of the Code

The Code provides a credible, nationally consistent framework that extends consumer protections into areas not comprehensively covered by traditional energy regulation. In a market characterised by rapid growth, fragmented delivery models and evolving technologies, the Code fills an important gap translating broad consumer protection principles into clear, sector-specific expectations for industry behaviour.

Evidence from complaints data, audit activity and stakeholder engagement confirms the Code has contributed to more consistent sales practices, improved disclosure and stronger customer service standards among participating businesses. It has established a common reference point for expected conduct, reducing variability in practice and supporting more predictable consumer outcomes.

The Code's national scope and alignment with policy objectives position it as a practical complement to government initiatives, enabling greater confidence in the delivery of new energy technologies where regulatory frameworks are evolving. As an industry-led, voluntary framework, it also offers a level of flexibility and responsiveness well suited to a rapidly changing market. It has the capacity to adapt more quickly than statutory mechanisms and to influence behaviour through guidance, engagement and standard setting.

A comparative analysis of seven national and international consumer codes (**Appendix C**) found that the Code excels in areas including:

- Regular public operational reporting
- Process transparency
- Sector- and technology-specific obligations
- Upfront assessments through the signatory application process features that were either absent or less developed in comparable frameworks.

The Code has established a strong and relevant foundation and its core design and purpose remain valid. However, its ability to deliver consistent, system-wide impact now depends less on the strength of the framework itself, and more on the governance, capability and positioning that support its operation at scale.

6.2 Structural and operational weaknesses

Despite the Code's strengths, this Review identified material constraints that are limiting effectiveness.

Governance and mandate clarity

Governance is the most significant structural constraint. While roles across the NETCC Council, Monitoring and Compliance Panel and Code Administrator are defined, arrangements do not consistently provide a clear strategic centre, timely decision-making, or proactive positioning of the Code within the evolving CER ecosystem.

Operating model and resourcing pressure

The operating environment has become more complex due to market growth, shifting business models and regulatory reform. Meanwhile, complaint volumes and case complexity are increasing, placing pressure on administrative and compliance functions and pushing the Code toward a more reactive posture.

System context and external expectations

The strength of the Code's mandate and its role in the broader consumer protection system is not consistently understood or articulated. While voluntary by design, the Code is increasingly relied upon particularly through government programs in ways that elevate expectations without statutory authority.

Under current settings, the Code is at risk of being defined by the limits of its operating context (reactive workload, unclear system role, constrained authority) rather than by its intended function of proactive industry uplift and consumer protection.

Due to increases in applications and complaints volumes, and ageing systems and processes, the Administration Team is resource constrained and must prioritise carrying out critical functions. This leaves little to no time to make longer term investments in the scheme, such as monitoring and audits, creating educational materials, and process improvements.

6.3 Risks if current settings remain unchanged

If current settings remain unchanged, there is a material risk that the Code's credibility and impact will not keep pace with the demands of a growing and increasingly complex CER market.

Some of these risks exist within the Code's operating model and can be addressed through stronger governance, clearer strategic direction and reinvestment in systems and resourcing. These include the Code administrator's capacity to monitor compliance, respond to complaints in a timely way and engage meaningfully with Approved Sellers and consumers.

However, other risks reflect broader system settings that are beyond the Code administrator's direct control. These include fragmented regulatory responsibilities, gaps in post-installation accountability, and the absence of a coordinated framework across consumer law, energy regulation and government programs. Addressing these risks will require action from a wider set of stakeholders including regulators, government and industry alongside efforts to strengthen the Code itself. There is also a risk that continued operational inefficiencies and inconsistent stakeholder experiences reduce industry confidence, weakening participation and undermining the Code's role as a mechanism for market uplift. This will increase pressure on statutory regulators and dispute resolution bodies in a system that stakeholders already describe as fragmented.

Notwithstanding identified areas for improvement, stakeholder sentiment and policy analysis highlights the Code's continued importance. In the absence of the Code, there is a significant risk that existing gaps in consumer protection would widen, as there are no alternative mechanisms capable of delivering comparable industry uplift and coordinated consumer safeguards at national scale.

6.4 Assessment findings

The Terms of Reference required this Review to assess six focus areas: Code effectiveness; governance and administration; compliance and enforcement; stakeholder engagement; financial and operational performance; and future-proofing and best-practice alignment. Assessment findings for each of these focus areas are outlined below (**Table 2**).

Table 2 Assessment findings summary

Review focus area	Assessment	Summary of assessment
Code effectiveness	Demonstrated effectiveness	This Review finds that the Code is effective in principle and delivers measurable benefits in practice, within defined structural and market limits. Evidence indicates improved standards across sales practices, disclosures and customer service, and the establishment of a nationally consistent benchmark in a fragmented market. However, effectiveness is constrained by low consumer awareness, incomplete market coverage and rising complaint volumes. Complaints increased from 168 in 2023 to 445 in 2025, reflecting both market growth and persistent areas of consumer dissatisfaction. Overall, the Code is functioning as intended, but its system-wide influence remains bounded. Greater consumer-facing visibility and broader market coverage are critical to sustaining effectiveness.
Governance and administration	Improvement required	Governance represents the most significant structural constraint identified in this Review. Current arrangements lack clear accountability and decision-making authority, are primarily operational rather than strategic, and do not consistently support proactive responses to emerging issues. There is no single strategic centre driving long-term positioning and evolution, and the Code's role within the broader policy and regulatory ecosystem remains under-articulated. Without clearer mandate, accountability and strategic governance, the Code will remain constrained in its ability to respond to system-level pressures and to shape market uplift.
Compliance and enforcement	Demonstrated effectiveness	Compliance and enforcement functions are established and appropriate in principle but are under increasing pressure from market growth and complexity. Key challenges include complaint handling and escalation, adherence to disclosure and contract obligations, and managing third-party and subcontractor behaviour. This Review identified that resource constraints limit consistency, timeliness and enforcement effectiveness, and repeat or systemic non-compliance is not always identified and escalated efficiently.

		Supported by the evidence collected in this Review, maintaining credibility requires more scalable compliance capability, stronger risk identification, and clearer handling of repeat or systemic issues.
Stakeholder engagement	Improvement required	Stakeholder engagement is a demonstrated strength, with established processes and strong participation across industry, regulators and advocates. The Code is regarded as a trusted forum for dialogue. However, feedback loops are not consistently visible, and stakeholders do not always see engagement translated into timely system change. There is also variability in the clarity and timeliness of guidance and communications to Approved Sellers. It is concluded that engagement is valued but not consistently perceived as impactful. Strengthening transparency of feedback-to-action pathways would increase trust and effectiveness.
Financial and operational performance	Priority action required	The Code is operating with legacy systems and processes that have not kept pace with growing market demand. Rising complaint volumes and increasing case complexity are driving a more resource-intensive and reactive operating posture, with the team's capacity largely absorbed by application processing and complaint handling. This limits the time and resources available for higher-value activities such as compliance audits, guidance development and proactive engagement with Approved Sellers. Financial data reviewed as part of this assessment indicates that while a yearly surplus has been maintained, the Code's resourcing model has not been regularly reviewed or adjusted in line with evolving demand. Available resources remain directed toward sustaining core operations, rather than being strategically allocated toward compliance capability, systems uplift or stakeholder engagement. As the CER market continues to expand, there is a risk that the Code's effectiveness and stakeholder confidence may not keep pace with the expectations of a maturing market. Some of these risks sit within the Code's operating model including governance, strategic direction and resourcing and can be addressed through the reforms recommended in this Review. Others reflect broader system settings, including fragmented accountability across the consumer protection landscape, which cannot be resolved through operational improvements alone. Introducing more frequent and structured reviews of the Code's financial position, resourcing model and strategic priorities would support better alignment between available resources and the demands the Code is expected to meet including complaint trends, compliance priorities, systems uplift and the Code's future operating model. This would enable the Code administrator and its governance bodies to make informed, forward-looking investment decisions and strengthen the Code's long-term effectiveness.

Future-proofing and best-practice alignment	Improvement required	The Code has a strong foundational design, but future readiness is uncertain under current settings. The CER market is evolving rapidly, with increasing complexity of technologies, business models and bundled offerings, alongside rising expectations from consumers and policymakers. This Review finds that the Code has limited mechanisms for proactive adaptation to emerging risks and only partial alignment with major reforms. Stakeholders consistently call for a clearer long-term vision, stronger policy alignment and enhanced capability to operate as a forward-looking mechanism. Based the evidence, it is considered that current arrangements for managing emerging risks and scope are limited, increasing the likelihood that the Code operates reactively rather than proactively shaping best-practice in a fast-changing market.

7. Recommendations

The recommendations are designed to strengthen the effectiveness, credibility and future readiness of the Code in a rapidly evolving CER market. They respond directly to the key structural and operational issues identified through this Review and aim to enhance the Code's ability to deliver consistent consumer protection outcomes within a complex and changing policy environment.

They are grounded in a comprehensive evidence base, including complaints data, compliance and governance analysis, stakeholder engagement, and insights developed through the Issues Paper and subsequent consultation. This provides a robust foundation for identifying where targeted changes are most likely to deliver meaningful impact.

The recommendations have been developed with a strong emphasis on practicality, proportionality and future readiness. They recognise the voluntary nature of the Code and the need to balance stronger consumer protection outcomes with industry capability, implementation feasibility and the evolving regulatory landscape. Where possible, they focus on achievable improvements and system alignment, while enabling the Code to adapt over time.

This Review also recognises that implementation will involve trade-offs. Strengthening compliance, governance and system integration must be balanced against resource constraints, participant burden and the pace of external reform. The recommendations are therefore framed to support informed decision-making, allowing for prioritisation and sequencing in line with strategic objectives and operational realities.

Table 3 Recommendations

Recommendation		Issue addressed	Outcome	Suggested actions
1	**Clarify the strategic role and positioning of the Code within the consumer protection ecosystem**	This Review identified a persistent lack of clarity regarding the Code's role, boundaries and point of difference relative to regulators, government programs and other consumer protection mechanisms. This ambiguity contributes to the mixed perception of value, misaligned expectations and reduced effectiveness. Evidence from Council, Panel and external stakeholder interviews consistently identified this as a foundational strategic issue.	Clear articulation and communication of the Code's strategic role within the broader consumer protection framework for new energy technologies, ensuring alignment, complementarity and system coherence.	1.1 Develop and publish a clear positioning statement that defines the Code's mandate, boundaries and relationship to statutory protections. Communicate this consistently across all platforms and stakeholder groups 1.2 Map and formalise stakeholder relationships with key bodies, including regulators, ombudsmen, government program administrators and consumer advocacy organisations 1.3 Progress a "no wrong door" approach to consumer protection and redress, in collaboration with state-based energy ombudsmen and relevant regulatory bodies 1.4 Establish a dedicated engagement mechanism between the Code and government to ensure ongoing alignment with emerging policy frameworks and regulatory reform. This engagement should be conducted as a function of the Code's governance, separate from broader Clean Energy Council advocacy activities.
2	**Strengthen the Code as a best-practice industry standard**	Evidence from Approved Seller surveys and stakeholder interviews indicates that the Code is frequently perceived as a compliance-focused scheme rather than a best-practice differentiator. This limits its ability to incentivise high performance, deliver visible value to industry, and support consumer-facing trust.	Reposition the Code as a differentiated, best-practice standard that recognises and supports high-performing industry participants, while maintaining robust minimum expectations.	2.1 Establish an industry working group to explore and develop an enhanced value proposition and industry outreach mechanisms to support best-practice uplift and continuous improvement 2.2 Appoint an industry representative within the NETCC Council to ensure the voice of industry informs governance and strategic direction 2.3 Strengthen communication and brand positioning to highlight leading practice and continuous improvement, including public recognition of high-performing Approved Sellers 2.4 Develop an expanded support programme for Approved Sellers, including updated guidance documentation, standardised templates, training materials, a dedicated support line and proactive communication 2.5 Commission a plain-English review of core Code documentation and develop standardised, industry-ready templates for quotes, contracts, disclosure and complaints handling.

3	**Establish a sustainable and scalable operating model**	Evidence from governance and operational analysis indicates that the Code's current operating model is not fully aligned with the scale and complexity of the market. Resourcing constraints limit the capacity for proactive engagement, strategic investment and operational improvement.	Strengthen the financial and operational model to support sustainable delivery, reduced resourcing risk, improved performance and future growth.	3.1 Review and reset the fee structure and funding model, supported by regular financial governance and a forward-looking investment plan aligned to the Code's strategic priorities 3.2 Enhance the role of the Council in governing the strategic investment plan and overseeing resource allocation decisions 3.3 Assess staffing and capability requirements to support increased proactive engagement, in line with the process improvements identified throughout this review 3.4 Consider the introduction of tenure-based or performance-based fee structures to recognise and reward organisations demonstrating sustained commitment to consumer outcomes.
4	**Strengthen alignment with government and regulatory frameworks**	This Review identified inconsistent integration between the Code and evolving government and regulatory reforms, reducing the Code's influence, system impact and ability to respond to changing policy settings. Stakeholder interviews highlighted growing reliance on the Code within government programs, without corresponding coordination or clarity of roles.	Establish the Code as a more integrated and proactive partner within the CER policy and regulatory ecosystem, including incentive schemes.	4.1 Formalise engagement with government reform processes, including the CER Roadmap and relevant state-based programme reviews 4.2 Position the Code as a data and insights partner to regulators and policymakers, leveraging complaints and compliance intelligence to inform system-level responses 4.3 Develop mechanisms for regular information sharing and collaboration, such as quarterly industry insights reporting to government and regulatory stakeholders 4.4 Formalise NETCC participation in stakeholder engagement processes relating to future consumer protection settings, including government and regulatory forums, with clear separation from the Clean Energy Council's advocacy and representation roles.
5	**Invest in technology and process modernisation**	Evidence from both operational analysis and Approved Seller feedback highlights high administrative burden and inefficiencies in processes, limiting organisational capacity and contributing to compliance fatigue among participants.	Modernise systems and processes to improve efficiency, reduce manual effort and support scalability across core operational functions.	5.1 Upgrade internal systems (particularly the Salesforce platform) to support improved data integration, reporting capability and insights generation 5.2 Automate core administrative and compliance processes to increase capacity and enable staff to focus on higher-value support and engagement activities 5.3 Streamline documentation, templates and submission processes to reduce burden for both Approved Sellers and staff, supporting more efficient assessment and compliance workflows.

6	**Transition to a proactive, data-led compliance model**	This Review identified a predominantly reactive compliance approach, limiting the early identification of risks and systemic issues. Current processes are resource-intensive and existing systems are not optimised to support efficient assessment, auditing or complaints management.	Strengthen systems and capability to operate as a proactive, data-driven compliance and risk identification function, enabling earlier intervention and more effective use of organisational resources.	6.1 Develop enhanced data collection, analysis and reporting capabilities to support insights generation and increase efficiency across assessments, auditing and complaints handling 6.2 Explore the use of technology and automation (including AI-enabled tools) for high-volume, repetitive processes where efficiency gains and quality improvements are demonstrable including assessment and passive compliance 6.3 Implement automated market monitoring and risk identification processes to enable more responsive oversight and early intervention 6.4 Establish a formal risk management framework to support proactive and responsive governance by the NETCC Council, including structured communication with Clean Energy Council executive leadership.
7	**Strengthen compliance, audit and assurance functions**	Evidence from Approved Seller surveys, consumer feedback and stakeholder interviews highlights increasing compliance pressures, persistent issues in specific areas, and limited audit and enforcement capacity. Stakeholders consistently linked the credibility of the Code to the strength and visibility of compliance and enforcement.	Enhance compliance and assurance mechanisms to improve consistency, credibility, transparency and enforcement outcomes.	7.1 Increase audit capacity and frequency via additional resourcing, process improvement and automation of highly repetitive tasks 7.2 Implement a passive compliance touchpoint at renewal, requiring Approved Sellers to provide a sample of current documentation to confirm ongoing compliance with Code requirements 7.3 Improve identification and management of repeat or systemic non-compliance, supported by proactive guidance, targeted alerts, training and support resources 7.4 Enhance transparency of compliance outcomes and enforcement actions through structured data sharing with government and regulatory stakeholders 7.5 Formalise a stepped compliance approach that prioritises early resolution and support before escalation to formal investigation, with clear criteria for proportionate enforcement responses.
8	**Strengthen consumer awareness, trust and brand recognition**	Consumer survey evidence and stakeholder feedback consistently highlight low consumer awareness and understanding of the Code, limiting its effectiveness as a trust signal and market differentiator. Additionally,	Increase consumer awareness, recognition and trust in the Code as a credible signal of quality and protection, while strengthening the independence and visibility of the brand.	8.1 Invest in consumer-facing brand and communication strategies to increase awareness and confidence in the Code as a consumer protection mechanism 8.2 Strengthen the clarity and visibility of the Approved Seller proposition as a trusted marker for consumers and a clear value signal for participating businesses

		there is a lack of clear separation between the Code and the Clean Energy Council, contributing to perceived conflicts of interest.		8.3 Improve consumer-facing education and guidance, including updates to the website to position the Code as a primary resource for consumers making purchasing decisions 8.4 Establish a clearer distinction between the Code and the Clean Energy Council, including dedicated email addresses, visual identity and online presence for team members and communications 8.5 Develop an annual Approved Seller satisfaction survey to monitor industry perceptions, gather ongoing feedback and inform strategic planning.
9	**Simplify and strengthen the consumer redress pathway**	Evidence from consumer and stakeholder surveys, as well as interview findings, highlights complexity and confusion in complaint handling and escalation pathways. Many consumers report not knowing how to lodge a complaint, not being aware of the Code, or finding the process difficult to navigate.	Improve the clarity, accessibility and effectiveness of consumer complaint and redress pathways.	9.1 Explore integration of Code complaints management with ombudsman and regulatory pathways to support a "no wrong door" approach and reduce consumer confusion 9.2 Improve consumer-facing guidance on complaints and escalation, ensuring information is clearly accessible on the website and includes references to adjacent redress pathways 9.3 Develop a consumer satisfaction survey at the conclusion of the complaint process to monitor effectiveness, identify improvement opportunities and demonstrate accountability 9.4 Review with a view to strengthening the Code requirements relating to post-installation handover, operational guidance and ongoing support, particularly as systems become more digitally integrated.
10	**Develop a structured approach to managing emerging risks and future scope**	This Review identified increasing risks associated with emerging technologies and service models, including uncertainty about where the Code should expand its scope. There is no formal process to assess these risks or guide decisions on Code coverage, creating a risk of reactive or inconsistent responses.	Establish a structured approach to identifying, assessing and responding to emerging consumer risks, including clear criteria to guide decisions on future scope.	10.1 Define clear criteria to determine whether new technologies or services should be included within the Code's scope 10.2 Establish a formal governance process for reviewing and approving scope changes 10.3 Introduce a regular review cycle to assess emerging risks and update Code coverage where appropriate.

8. Implications for the future of the Code

This Review confirms that the Code has established a credible and increasingly important foundation as a voluntary, industry-led consumer protection framework within the CER market. As the energy system continues to decentralise and digitise, the role of trusted governance arrangements becomes even more critical.

The implications of this Review extend beyond individual recommendations. They speak to how the Code must continue to evolve to remain effective, legitimate and trusted within an operating environment characterised by rapid technological change, diverse business models and growing consumer participation.

8.1 What successful implementation would enable

Effective implementation of the Review's recommendations would strengthen the Code's role as a nationally consistent benchmark for responsible conduct in the sale and delivery of new energy technologies. It would:

- Improve the clarity and consistency of consumer protections, reducing uncertainty and variability in outcomes
- Establish clearer and more consistent expectations for industry participants, supporting fair competition and capability uplift
- Increase confidence among regulators and policymakers that voluntary governance arrangements can deliver meaningful consumer protection outcomes.

A more visible, transparent and responsive Code would reinforce its value proposition for consumers and Approved Sellers, supporting long-term sustainability and legitimacy as the CER market expands and matures.

8.2 Risks and opportunities in an evolving CER market

The CER market is expected to continue expanding in scale, complexity and pace, driven by technological innovation, government policy settings and changing consumer behaviour. This creates a significant opportunity for the Code to play a more influential role in shaping fair and consistent market practice, particularly where regulatory frameworks lag emerging products, services or business models.

This Review highlights material risks if the Code does not adapt. These include erosion of consumer trust, increasing variability in compliance and outcomes, and diminished confidence in voluntary, industry-led governance mechanisms. Maintaining credibility will require ongoing alignment with regulatory and policy reform, clearer articulation of the Code's role within the broader consumer protection system, and sufficient resourcing to support effective oversight, compliance and engagement.

8.3 Ensuring the Code remains fit for purpose

To remain fit for purpose, the Code must continue to evolve in response to changing consumer risks, market structures and policy expectations. This will require a clearer definition of its strategic role and boundaries, strengthened governance and administrative capability, and a more structured approach to identifying and responding to emerging risks.

This Review established that the Code is transitioning from a voluntary industry uplift mechanism, toward a system-integrated component of Australia's consumer protection infrastructure. Clear strategic intent, supported by targeted operational improvements, will be critical to ensuring the Code remains credible, effective and adaptable in the next phase of market development.

8.4 Implications for key stakeholder groups

For consumers, a strengthened and more adaptive Code would provide greater transparency, clearer expectations and more accessible pathways to redress supporting confidence to engage with new energy technologies.

For industry participants, clearer standards, improved consistency and a stronger value proposition would support compliant businesses, encourage capability uplift and reduce the competitive advantage associated with poor practices.

For regulators and government programs, a credible and well-functioning Code provides an important complement to statutory protections, supporting policy delivery, market integrity and consumer confidence where incentive programs are used to accelerate market uptake.

The following graphic depicts these implications (**Figure 12**).

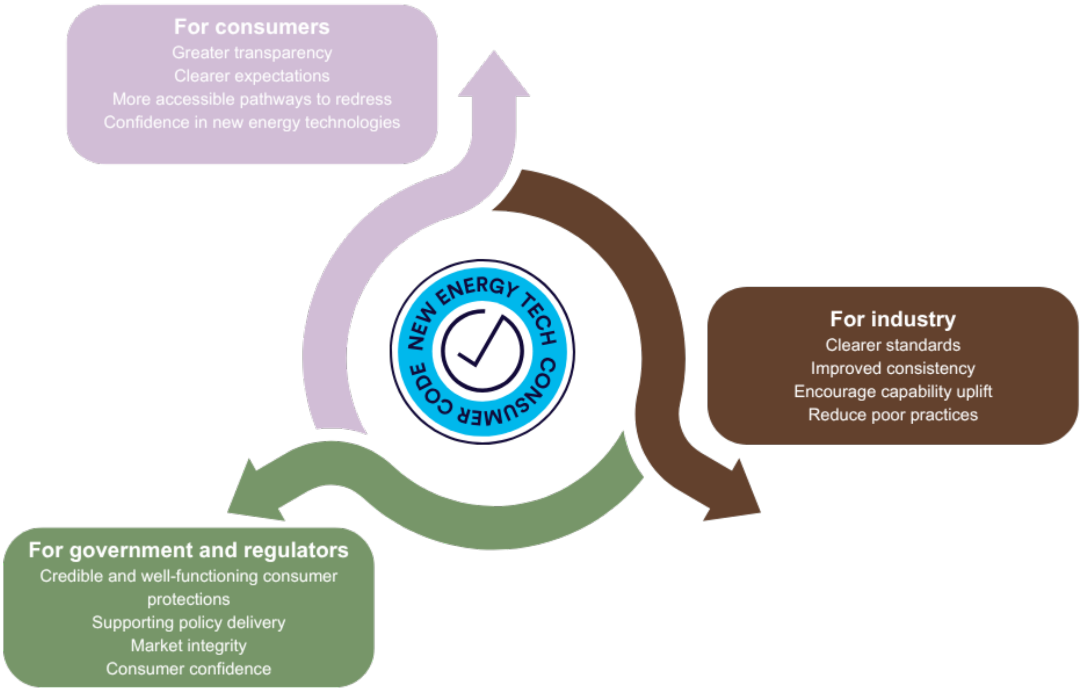

Figure 12 Stakeholder implications of a strengthened NETCC

Ultimately, the Code's future significance lies not only in the protections it provides today, but in its capacity to sustain trust, confidence and fairness as new energy technologies become embedded in everyday life. As the energy transition accelerates, the Code has the potential to play a defining role in ensuring that innovation delivers benefits for consumers, industry and the system as a whole.

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Appendix A: Independent Review Terms of Reference

Independent Review of the
New Energy Tech Consumer Code (NETCC)
Terms of Reference

1. Purpose of the Review

This Independent Review ('Review') will assess the effectiveness, governance, and operation of the New Energy Tech Consumer Code ('NETCC') and its administration, in accordance with clause A26(h) of the NETCC and the Memorandum of Understanding of January 2019.

The Review will:

- Determine whether the NETCC is delivering on its objectives of protecting consumers, promoting industry best practice, and building public confidence in new energy technologies.
- Examine the governance, monitoring, compliance, and enforcement frameworks to ensure they are robust, transparent, and fit for purpose.
- Identify opportunities to strengthen consumer protections, enhance industry performance, and ensure the NETCC reflects current and emerging market, technology, and regulatory developments.

2. Scope of the Review

The Review will address the following areas:

2.1 NETCC Effectiveness

- Assessment of whether the NETCC's provisions are achieving intended consumer protection outcomes.
- Evaluation of the extent to which the NETCC meets community expectations, regulatory requirements, and recognised industry best practice.
- Review of industry uptake, including any barriers to entry and retention.

2.2 Governance and Administration

- Assessment of the roles, responsibilities, and performance of:
    - the NETCC Council ('Council')
    - the NETCC Monitoring and Compliance Panel ('Monitoring and Compliance Panel'), and
    - the Code Administrator/Steward (the Clean Energy Council) in oversight, administration, and enforcement of the NETCC.
- Review of appointment processes and governance arrangements for the Administrator, Steward, and Finance Delegate, including alignment with the Memorandum of Understanding.
- Evaluation of the transparency, accountability, and independence of governance structures.

2.3 Compliance and Enforcement

- Review of the adequacy and effectiveness of compliance monitoring, complaints handling, audit processes, and enforcement measures.
- Consideration of systemic issues identified in the 2023 and 2024 Annual Reports, including:
    - Complaints handling – persistent breaches of acknowledgement, update, and resolution timeframes; inadequate escalation processes.
    - Contracts and variations – unclear terms, incomplete disclosures, improper

handling of changes.
  - Quotes and financial disclosures – missing performance data, timelines, itemised costs; misleading return on investment claims and undisclosed extra charges.
  - Advertising and promotion – false or misleading claims, including misrepresentation of scheme participation.
  - Legal and privacy obligations – ongoing failures in data protection; risks in unsolicited sales.
  - Third-party oversight – inadequate control of contractors, agents, and partners.
  - Delivery, installation and safety – delays without agreement; non-compliance with standards (more evident in 2023).
  - Examination of the balance between education-based compliance approaches and sanctions.

2.4 *Stakeholder Engagement*

- Review of the adequacy of stakeholder consultation processes and responsiveness to feedback from consumers, industry, regulators, and government agencies, including but not limited to: the Australian Competition
- and Consumer Commission (ACCC), the Clean Energy Regulator (CER), relevant state regulators, eg Solar Victoria.
- Evaluation of communication effectiveness with NETCC signatories, including compliance guidance, education, and training.
- Engagement with customers of New Energy Tech who may have had experiences with the Code.

2.5 *Financial and Operational Performance*

- Assessment of the financial and operational sustainability of the NETCC and adequacy of resources allocated to administration, compliance, and enforcement.
- Examination of operational efficiency and capacity to meet the NETCC's obligations.

2.6 *Future-Proofing and Best Practice Alignment*

- Evaluation of the NETCC's ability to anticipate and respond to emerging market trends, new technologies, and evolving consumer expectations.

3. Objectives of the Review

The Review will:

1. Determine whether the NETCC and its governance framework remain effective, relevant, and credible.
2. Recommend amendments to ensure the NETCC:
   a. Reflects evolving consumer protection standards.
   b. Supports effective enforcement.
   c. Meets the requirements for continuing ACCC reauthorisation.
3. Identify opportunities to improve administrative processes and compliance monitoring.
4. Recommend measures to enhance stakeholder engagement, transparency, and accountability.

4. Deliverables

The Independent Reviewer will provide:

- **Issues Paper** – identifying key themes and inviting stakeholder submissions.
- **Findings of the Stakeholder Consultation** – documenting engagement with consumers, industry, regulators, and other stakeholders.
- **Draft Review Report** – setting out findings, analysis, and draft recommendations.
- **Final Review Report** – incorporating feedback and containing:

Assessment against the objectives and scope.

Clear, prioritised recommendations.

Implementation considerations, including indicative timelines and resource requirements.

The Final Report must be published on the NETCC website in accordance with clause A26(h) of the NETCC.

5. Methodology

The Review will include:

- Examination of the New Energy Tech Consumer Code, the Memorandum of Understanding, Annual Reports, Terms of Reference, governance records, compliance data, complaints statistics, and audit outcomes.
- Comparative analysis with other consumer protection codes and regulatory schemes.
- Feedback from stakeholders by way of interviews, surveys, focus groups, written submissions as appropriate.
- Analysis of compliance trends and systemic issues.

6. Independence of the Reviewer and Appointment

The Reviewer must:

- Have demonstrated expertise in consumer law, governance, compliance frameworks, and/or energy sector regulation.
- Be independent of the NETCC Council, the Panel, the Administrator/Steward, and all NETCC signatories.
- Be jointly appointed by the Panel and the Administrator/Steward in line with the Memorandum of Understanding.

7. Timeframe

- **Q3 2025:** Confirm responsibilities, finalise Terms of Reference, issue call for tenders.
- **Q4 2025:** Select and appoint independent reviewer.
- **Q4 2025–Q1 2025–26:** Conduct review, undertake stakeholder consultation, release Issues Paper.
- **Q2 2025–26:** Deliver draft and final reports.

8. Governance of the Review

The Panel and the Administrator will jointly oversee the Review to ensure it is conducted in accordance with these Terms of Reference. The reviewer will provide progress

updates to the Panel as agreed following appointment.

9. Use of Findings

The NETCC Council, the Panel, and the Administrator will consider the Review's

recommendations and determine implementation priorities. The Administrator will prepare an implementation plan for approved changes.

Appendix B: Mapping the processes

Interviews with NETCC staff, data analysis and research was carried out to understand the processes involved in NETCC operations.

Overall, processes are carried out effectively by a skilled team within the NETCC. They are diligent in assessing applications and communicating to applicants where improvements must be made to be accepted into the NETCC, meditating complaints in a timely manner, and conducting audits where possible.

Due to resource constraints and outdated systems, the team is limited in the scope in which they can operate, often having to spend large amounts of time carrying out application and complaint processes. This leaves little time for improving and uplifting the code through audits, creating guidance documents, and stakeholder engagement with signatories.

Investing in improving the systems and processes in operating the NETCC, and assessing resourcing requirements considering increased signatories and complaints will unlock greater output from the team, improving the outcomes of the NETCC and creating a more stable operating environment.

The processes that comprise the main functions of the NETCC are as follows:

- Applications: assessing retailers who want to become NETCC signatories, including document review, business checks, advertising checks, and approval/rejection.
- Monitoring and audits: checking whether signatories continue to meet Code obligations through audits, online checks, documentation reviews, and risk monitoring.
- Complaints: handling consumer complaints, investigating potential breaches, requiring corrective action, and escalating to suspension or expulsion where needed.
- Renewals and signatory management: managing annual renewals, fees, portal access, resignation and reapplications.
- Guidance and reporting: creating guides, templates, consumer information products, seller resources, FAQs, training materials, and reporting on activity, trends and outcomes.

Applications

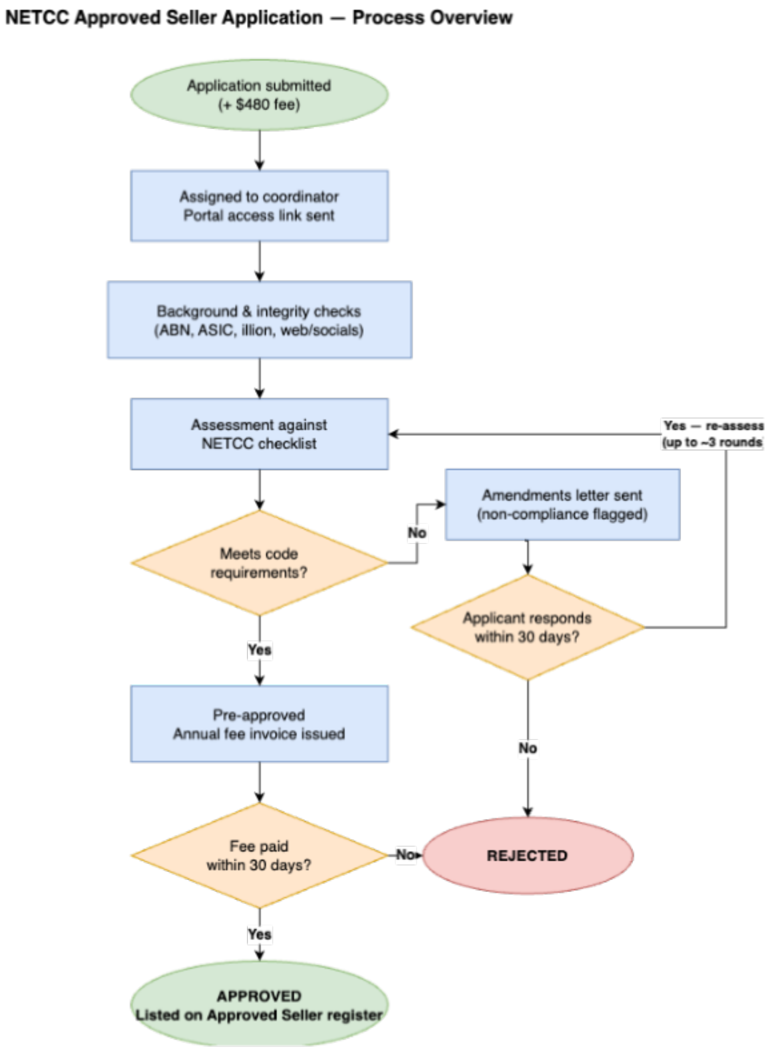


Figure 10 NETCC Application Process Map

The application process is the most structured stage in the NETCC. Prospective signatories apply through a public web form and can continue their application through a portal. The NETCC team work through a multi-layered check list and review process. This process involves:

- Integrity checks through 3rd party providers and open-source research, and
- Examining the applicant's contracts and quotes, pricing and incentive disclosures, advertising and online claims, complaints-handling procedures, warranty and cooling-off provisions, deferred-payment arrangements, and performance-estimate practices.

Few applications meet the code at first review; on average an applicant goes through around three rounds of amendments before a decision is reached. Once all requirements are resolved the applicant is pre-approved, pays the relevant fee, and is automatically listed on the NETCC website.

It is rare for applicants to pass the application without amendments to their business practices, documents or website (*Figure 8*). This indicates that the application process does uplift applicant quality and consumer outcomes when interacting with these businesses but requires a high level of checking by the NETCC staff and remediation by the applicant. There are opportunities to improve the application process by:

- For applicants: Better upfront education and guidance on what is required in a successful application and common issues that require amendments. This could be done through guides or webinars. The resources would require regular updating to adapt to the changing energy and technology landscape .
- For NETCC staff: improved process for assessing applications. This includes automating simpler checks and assessments that staff can review, as well as improving manual tools and processes. For instance, the current process requires manual assembly of amendment letters to be sent to applicants, and check lists are outdated and not suitable for emerging products such as batteries or VPPs.

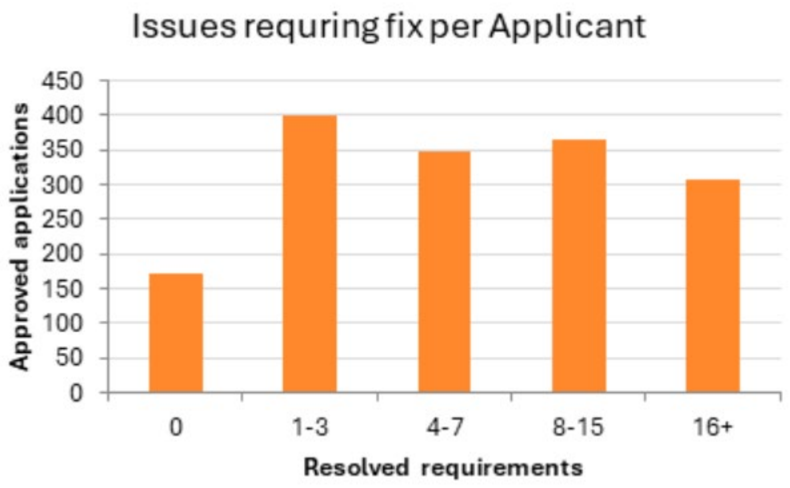


Figure 11 Issues requiring fix per Applicant

Monitoring and Audits

The NETCC runs two complementary audit programs:

- Competency audit: a multiple-choice questionnaire to ensure signatories understand key concepts and requirements of the NETCC. Around 20% of signatories per year are sent the questionnaire.
- Robust audit: A more in-depth investigation where the team obtains recent sales documentation and tests them against the code's requirements, alongside a review of the signatories current advertising and online presence. Approximately 40 robust audits were completed over the last twelve months.

Robust audits are an effective way to proactively ensure signatories are maintaining high retailing standards required of the code, rather than reactively responding to complaints with sufficient evidence. Due to resourcing constraints, the team is limited in how many audits can be carried out. While there is opportunity to automate some monitoring and audit functions, such as signatory website or social media reviews, ultimately increasing the resourcing of the NETCC team would allow more "non-critical" functions such as audits to occur.

Complaints

Complaints reach the NETCC primarily through a web form, with email and telephone as supplementary channels, and progress through a clearly defined pathway involving the complainant, the signatory and third parties such as state regulators or safety bodies.

Complaint volumes have risen sharply since the launch of the federal battery program. The compliance function is under acute resourcing strain as a result.

Figure 12 Total Complaints Opened by Quarter

The rate of complaints being resolved in a timely manner is beginning to slow, with around 50% of complaints being resolved within 60 days in the second half of 2025, compared to 60-70% during 2024. This is a lagging indicator demonstrating the strain the NETCC team is currently under with the increased level of complaints to process.

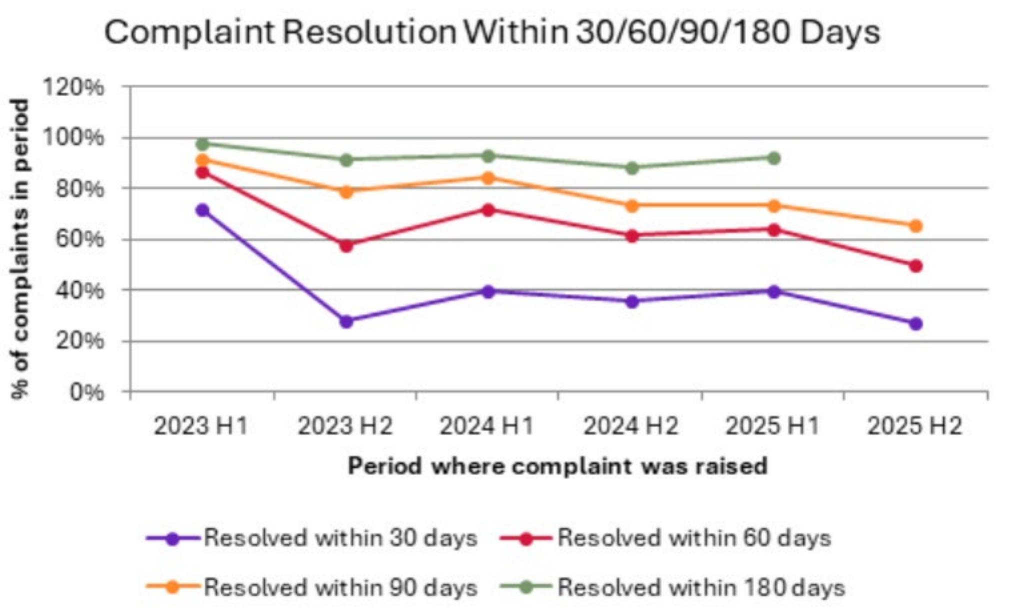
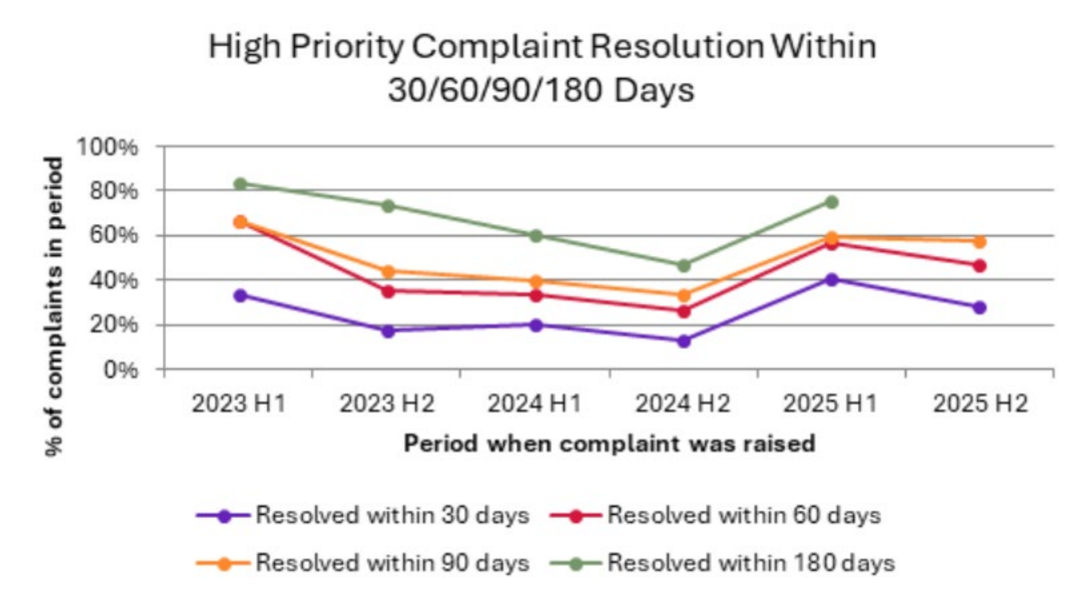


Figure 13 Complaints Resolved Within Certain Timeframes

The time to resolve high priority complaints, which are often more complex to solve than typical complaints, had been increasing over the last few years. The NETCC team have focused on resolving high priority complaints more quickly and that is demonstrated in the data with faster complaint resolution rates in 2025. In high priority complaints consumers are often experiencing negative outcomes that can benefit from being solved in a timely manner, therefore the focus of the team on resolving these complaints quickly is an effective use of resources.



Just like applications, improvements to business process and tools for the NETCC team can ease the strain increase in volume of constraints, as can hiring more resources for this function.

There are two key areas that limit the complaints function:

- Information-sharing with adjacent regulators and safety bodies. The NETCC is not recognised as a government authority and has only limited, mostly one-way interactions with distribution network service providers, the Clean Energy Regulator, state regulators and equivalents.
- Limited capacity to deliver redress to individual consumers. The NETCC can investigate, find a breach, and impose compliance action up to and including expulsion, but it cannot compel financial remedy, particularly where a signatory has ceased operating or become unresponsive.

The clearest improvement opportunities flow from these limits: formal information-sharing arrangements with DNSPs and safety bodies, fuller use of complaints data as systemic intelligence, and earlier signposting of external redress avenues for consumers whose practical loss the NETCC cannot itself resolve.

Renewals and Signatory Management

The renewal process is largely automated. Opportunities are generated in Salesforce approximately a month before a signatory's expiry, reminder emails are issued at set intervals, and renewal is completed through the Approved Seller portal in 12-month increments. Payment is generally made by BPay which requires the signatory to engage actively within the renewal window, supported by automated reminders.

While it is possible for the NETCC team to contact signatories during the renewal period to assist with renewals or seek feedback on any suggestions or difficulties they have with the scheme, this is rarely done due to resource constraints and having to prioritise more critical functions such as applications and constraints. Between 11-15% of signatories have resigned each year. The overwhelming majority have not actively resigned but have simply not paid a renewal fee. Due to this it’s unknown why these signatories have resigned, such as going out of business, not seeing sufficient value in the NETCC, or forgetting the make payment.

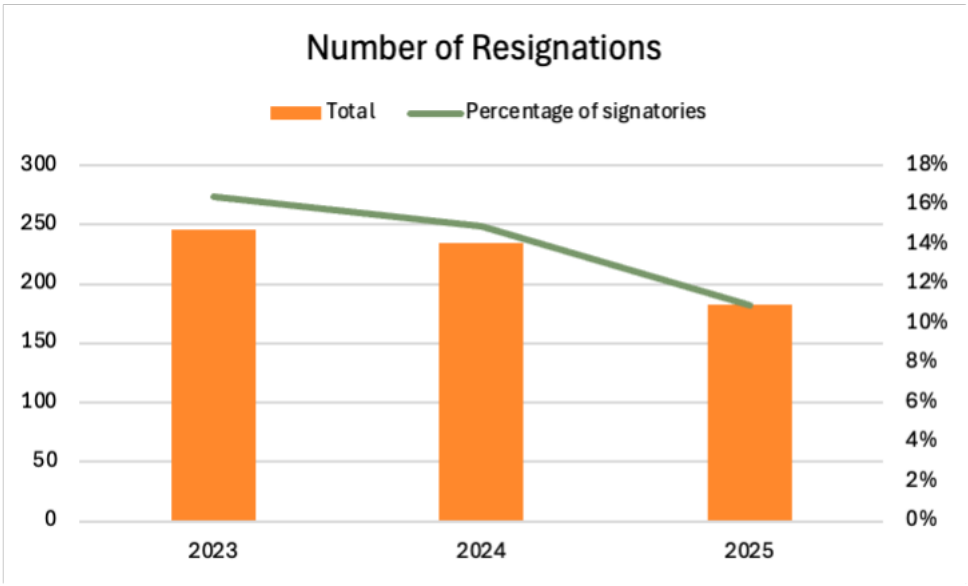


Figure 14 NETCC resignations year on year since 2023

With sufficient resourcing there is an opportunity for a more active model of renewal engagement, including targeted outbound contact, conversations with signatories about the value they derive from the scheme and recommendations for improvement between renewal points. More proactive engagement at the renewal point is both a likely retention measure and a mechanism through which signatories can identify improvements to the scheme itself, with corresponding gains for the credibility and continuing relevance of the NETCC.

Guidance and Reporting

The NETCC creates guidance documents for signatories for technologies and products. This includes information on selling and installing products in compliance with the code and achieving positive customer outcomes. With increased resourcing, these guides could be updated more frequently and promoted more broadly to increase the value the NETCC provides to signatories and improve customer outcomes further.

The NETCC performs regular reporting on applications, complaints and audit outcomes. This includes up to date advice and insights to help signatories comply with the code such as case studies and reminders on obligations. This information is valuable to the industry and consumers, but could be improved by making reporting more accessible through promotion, more prominent display on the website, or through more accessible formats.

Appendix C: Comparative analysis to other consumer protection schemes

A scan was carried out of adjacent and similar codes to the New Energy Technology Consumer Code (NETCC), both in Australian and internationally, to compare where the NETCC reflects best practices while also identifying mechanisms that could improve the NETCC. Codes and certification schemes were examined in energy, payments and telecommunications, with seven codes short-listed for comparison to the NETCC:

- Renewable Energy Consumer Code[1]: A UK code covering sales, contracts, installation, after-sales, vulnerable consumers, monitoring, and disciplinary action in consumer renewables such as solar PV, heat pumps, some boilers and other renewable technologies.
- Microgeneration Certification Scheme[2]: A UK technical certification and insurance scheme to ensure equipment is installed correctly. Works in conjunction with the Renewable Energy Consumer Code (RECC)with requirements covering installer competence, product and installation standards, customer commitments, complaints and financial protection.
- ASIC ePayments Code[3]: An Australian voluntary code administered by ASIC covering consumer electronic payments, including terms and conditions, unauthorised transactions, mistaken internet payments, complaints handling, subscriber coverage and ongoing ASIC monitoring.
- Australia Telco Consumer Protection Framework[4]: An Australian telecommunications consumer protection framework covering mobile, landline, internet and NBN services.
- General Insurance Code of Practice[5]: An Australian voluntary industry code covering general insurance sales, claims, complaints, vulnerability, financial hardship, distributors and service suppliers.
- FCA Consumer Duty[6]: A UK outcomes-based conduct regime for retail financial services.
- Smart Meter Installation Code of Practice[7]: A UK installation-stage code for smart meter rollouts, now incorporated into the Retail Energy Code.

Overall Findings

The NETCC performs strongly in the operational and procedural domains, and less strongly on governance and enforcement. The NETCC excels at regular public operational reporting, process transparency, sector and technology specific obligations and guidance, and upfront assessments through the signatory application process. Many other codes either did not have these features or had them to a lesser extent to the NETCC.

The main strengths of other codes relative to the NETCC are in governance, oversight and enforcement. Much of this gap is structural; as the codes reviewed have typically been established by government or regulatory agency, they tend to have a more established role, mandate and links to other government agencies.

Overall, this analysis demonstrates that the NETCC has a high level of operational capability but is limited in its ability to be effective due to the nature of being a limited, industry driven code. Other codes present examples of how the NETCC could increase its effectiveness through better integrations with adjacent regulators, clearer escalation pathways and enforcement options, and mature governance framework.

Where the NETCC Excels

Domain	Details
Visibility	A key strength is regular operational reporting on applications, complaints, referrals, audits, breaches, remedial actions and outcomes, providing more scheme-level visibility than many comparator codes.
Transparency	Process transparency is stronger than in many narrower schemes, with published complaints procedures and code guidance that make administration easier to follow.
Specificity	The Code is sector and technology-specific, with detailed clauses on contracts, quotes, advertising, performance claims and consumer information
Application Process	The signatory application process provides a front-end gatekeeping role that many regimes lack, particularly those that regulate firms only after market entry.
Technical Guidance	Technology-specific guidance is a clear strength, giving the Code practical, updateable material for different products, installation practices and consumer risks.

Opportunities to improve

Domain	Details
Governance, Oversight and Mandate Clarity	Stronger comparator models have clearer independent oversight, strategic accountability or board-level responsibility, highlighting an opportunity to clarify the Code's mandate and governance role within the broader CER system.
Compliance, Enforcement and Sanctions	Several comparator schemes provide more visible escalation pathways, sanctions, public discipline or enforceable backstops, pointing to an opportunity to strengthen consequences for repeated or systemic non-compliance.
Stronger Integration with Adjacent Regulators	Other models provide clearer complaint, referral and redress pathways across code bodies, regulators and dispute-resolution schemes, highlighting an opportunity to make the consumer journey more seamless.
Third-Party, Installer and Technical Accountability	Comparable energy schemes place clearer obligations on subcontractors, installers and technical delivery partners, highlighting an opportunity to strengthen accountability across the full delivery chain.
Technical Guidance	Some schemes have clearer mechanisms to update rules, technical requirements and outcomes expectations as markets change, pointing to an opportunity to make the Code more adaptive over time.

Appendix D: NETCC Council and Panel interviews

This appendix presents a structured synthesis of findings from in-depth interviews with members of the NETCC Council and Code Review Panel. These interviews provide a strategic, longitudinal perspective on the New Energy Tech Consumer Code (NETCC), including its original intent, current performance, and future role within Australia's evolving Consumer Energy Resources (CER) market.

Evidence base

The findings reflect input from a small cohort of senior participants directly involved in the governance, oversight and implementation of the Code. As such, insights presented are qualitative and system-oriented, providing authoritative perspectives on structural, policy and institutional dynamics.

All findings have been aggregated and de-identified to preserve confidentiality.

2. Summary of key insights

Across the interview cohort, there is consistent agreement that:

- The NETCC continues to serve an important and necessary function within the consumer protection landscape
- The Code has contributed meaningfully to lifting baseline industry standards

However, its effectiveness is increasingly shaped by a set of structural tensions arising from changes in policy settings, market conditions and stakeholder expectations

These tensions are not isolated issues; rather, they represent system-level dynamics that influence how the Code is interpreted, applied and assessed.

Establishment and intended role of the NETCC

Interviewees consistently identified the origin of the NETCC as a pragmatic policy response to a regulatory gap. At the time of establishment:

- Governments recognised rapid growth in new energy technologies
- Existing regulatory frameworks were not well adapted to emerging risks
- There was a need for an interim, non-regulatory mechanism to support consumer protection

The Code was therefore designed to:

- Provide a baseline level of assurance for consumers and governments
- Support industry-wide uplift in practices
- Enable innovation in a rapidly evolving market environment

There is broad agreement that the NETCC has largely fulfilled this intended role, particularly during periods of early market expansion.

However, interviewees emphasised that the scheme was not designed to function as a statutory regulator or ombudsman, and expectations to the contrary represent a misalignment with its intended remit.

Tension between voluntary design and mandatory application

A central finding is the increasing divergence between the Code's voluntary design and its practical application as a mandatory requirement in some jurisdictions.

This shift is primarily driven by government policy settings that require NETCC participation as a condition of accessing incentive or rebate schemes .

As a result, the Code has evolved from:

- A voluntary, best-practice framework, to
- A de facto minimum standard for market participation

Interviewees identified this as a core structural tension, with implications for:

- The strength and nature of enforcement
- The expectations placed on the Code
- The consequences of compliance decisions

"It started as a best practice voluntary scheme, but in some jurisdictions it's really become a minimum standard — and that wasn't the original intent."

"Expelling someone from the code under a mandatory regime has huge consequences, and we don't have the same processes or protections that a regulator has."

In particular, enforcement outcomes such as suspension or expulsion can now carry significant commercial consequences, without the Code having equivalent statutory authority, procedural safeguards or resourcing.

Consumer protection outcomes and system limitations

Participants broadly agreed that the NETCC provides **additional value for consumers**, particularly in:

- Improving sales practices
- Lifting behavioural standards among participating providers
- Providing an additional pathway for complaint escalation

However, there was also consistent acknowledgement of **persistent system-level gaps**, including

limited consumer understanding of:

- The purpose of the Code
- The protections it provides
- Where responsibility lies in the event of issues
- Fragmentation across consumer protection pathways, including:
    - Ombudsman schemes
    - Fair trading bodies
    - Industry mechanisms

"Consumers just don't know where to go… they get passed around between different bodies."

Participants also emphasised that the NETCC cannot provide complete consumer protection coverage, particularly:

- Where issues fall outside scope
- Where a business exits the scheme

"If we didn't have a NETCC, you'd just end up with a jurisdictional patchwork… and consumers are left thinking, 'what the heck is going on?'"

Insight: The NETCC operates as a complementary mechanism within a fragmented system, rather than a comprehensive solution.

Shift in operational focus: proactive uplift to reactive activity

A consistent observation across interviews is the shift in the Code's operational focus from:

- Proactive, sector-wide uplift and capability building, to
- Reactive complaints management and compliance activity

This shift is driven by:

- Increasing complaint volumes
- Growing complexity of cases
- Rising expectations from stakeholders

"The volume of complaints has pulled a lot of focus into reactive work."

"The code was designed to lift industry capability, but the volume of complaints has pulled a lot of focus into reactive work."

While complaint handling remains critical, interviewees expressed concern that:

- It consumes disproportionate resources, and
- Limits the Code's ability to deliver broad-based, preventative improvements across the sector

Compliance philosophy and enforcement approach

The Code's enforcement approach is characterised by a "support to comply" model, which prioritises:

- Working with businesses to achieve compliance
- Maintaining engagement to protect existing consumers
- Avoiding premature exclusion of providers

"The second we suspend or expel them, we lose the ability to help their customers."

This approach is considered appropriate by participants, but introduces challenges:

- It is resource-intensive
- It may conflict with external expectations for stronger enforcement
- It requires careful judgement in high-risk cases, particularly where the scheme is effectively mandatory

Insight: The Code is balancing competing expectations between capability uplift and enforcement, with inherent trade-offs.

Governance, independence and external perception

Interviewees expressed strong internal confidence in the **governance model**, particularly in relation to:

- The independence of the Code Review Panel
- The rigour of decision-making processes
- The integrity of oversight mechanisms

However, external perceptions are more variable:

- The scheme is often interpreted as **industry-led self-regulation**
- There is limited understanding of the separation between administrator, council and panel

"Externally, the scheme is still widely seen as industry regulating industry, even where that isn't how it operates in practice."

Insight: There is a disconnect between internal governance strength and external perception, which may influence trust and credibility.

Scope, market evolution and emerging risks

Interviewees highlighted that the NETCC is operating in an increasingly complex and evolving environment, with emerging technologies including:

- Virtual power plants
- EV charging
- Energy management systems
- Subscription-based services

While there is support for adaptation, there is also strong caution regarding **scope expansion**:

"We need to be really clear about which products should sit under the code… and not just keep adding everything."

Key risks identified include:

- Difficulty defining performance standards
- Ambiguity in consumer risk and accountability
- Overlap with regulatory responsibilities

Insight: Maintaining effectiveness will require disciplined decision-making regarding scope, rather than incremental expansion.

Core strategic tensions

The interviews collectively highlight a set of enduring strategic tensions shaping the operation of the Code:

- Voluntary design vs mandatory application
- Proactive uplift vs reactive enforcement
- National coordination vs limited regulatory authority
- Breadth of scope vs depth of consumer protection
- Internal independence vs external perception

These tensions are inherent to the current design and operating environment, and are expected to persist rather than resolve without intentional policy and strategic intervention.

Overall conclusion

Council and Panel interviews present a consistent and coherent narrative: The NETCC remains a necessary and valuable component of the consumer protection landscape, particularly in a complex and evolving market.

It has delivered meaningful improvements in baseline industry behaviour and consumer protection. However, its future effectiveness will depend on clarifying its role, strengthening alignment with policy frameworks, and explicitly managing the structural tensions inherent in its design.

Looking forward, there is a clear expectation that the NETCC will need to evolve towards a more strategically defined and system-integrated model, with greater clarity regarding:

- Its role relative to regulation ;
- Its approach to enforcement and uplift, and;
- Its scope within the broader CER ecosystem.

Interviewees

Independent Council Chair	Clare Petre
Council Member, Australian Energy Council	Ben Barnes
Council Member, Energy Consumers Australia	Lotte Wolff
Council Member, Solar Citizens	Genevieve Kelly
Council Member, Energy Networks Australia	Dor Son Tan
Council Member, Renew	Dean Lombard
Panel Chair Sydney University	Penelope Crossley
Panel Member, Energy Project	Patrick Greene
Panel Member, Justice and Equity Centre	Craig Memery

Appendix E: Stakeholder interviews

This appendix presents a structured synthesis of findings from in-depth interviews with external stakeholders, including regulators, government agencies, ombudsmen, finance actors, and consumer representatives.

These stakeholders engage with the New Energy Tech Consumer Code (NETCC) from outside its governance and operational structures, providing an independent system-level perspective on its role, effectiveness and limitations within the broader consumer protection landscape.

Evidence base

The findings reflect insights from a small cohort of system actors with direct or adjacent responsibility for consumer protection and energy market oversight. As such, the analysis is:

- Qualitative in nature
- Focused on system dynamics, institutional relationships and policy implications

All findings have been aggregated and de-identified.

Summary of key insights

Across the stakeholder cohort, there is strong alignment that:

- The NETCC plays a legitimate and valuable role in the current system
- However, it operates within a fragmented and incomplete consumer protection ecosystem
- Its impact is shaped by external dependencies, including regulatory coverage, jurisdictional boundaries, and policy choices

A consistent theme is that the NETCC is increasingly being relied upon as a system-level solution, despite being designed as a bounded, non-statutory mechanism.

There were some stakeholders with strong views of the NETCC ineffectiveness particularly associated with its lack of consumer redress and perception of "easy" entry – low bar to enter the program.

The role of the NETCC in the consumer protection system

Stakeholders consistently identified the NETCC as fulfilling an important coordination and assurance function, particularly in areas where formal regulatory coverage is incomplete or fragmented.

"The NETCC plays a useful role in providing confidence to government where there isn't an obvious regulatory mechanism that applies."

"It's helpful in a fast-moving space where regulation hasn't been able to keep pace — but it's not a substitute for regulation."

From a system perspective, the NETCC is best understood as:

- A complementary mechanism, rather than
- A primary enforcement or redress mechanism

Insight: The Code plays a legitimate but bounded role, supporting consumer protection without replacing regulatory or statutory functions.

Fragmentation of consumer protection and redress pathways

Stakeholders consistently highlighted the absence of a clear, end-to-end consumer protection framework for CER, with responsibility distributed across multiple institutions. Even those less supportive of the NETCC recognised the need for consumer protections over and above mechanisms such as Australian Consumer Law.

"Consumers are often bounced from body to body because no one quite has jurisdiction…"

"A lot of complaints related to consumer energy resources simply don't sit neatly within existing ombudsman schemes."

Challenges identified include:

- Overlapping or unclear jurisdiction across regulators, ombudsmen and agencies
- Different complaint pathways depending on product type, provider model or state
- Gaps in redress where providers fall outside traditional energy frameworks

Insight: Consumer protection outcomes are constrained by system fragmentation, with no single organisation able to provide comprehensive coverage.

Voluntary scheme, mandatory expectations

Stakeholders echoed concerns regarding the growing tension between the Code's voluntary design and its increasing use as a mandatory policy lever, particularly through government rebate and incentive schemes. It was considered to be an effective program to complementing state and federal incentives schemes to support consumers with the uptake of consumer energy resources. However, stakeholders recognised the limitations of the voluntary nature in delivering inconsistent consumer protections and challenged if a voluntary code would effectively deliver industry wide uplift.

"Requiring NETCC membership is an attractive lever because it provides a level of assurance."

"There's a risk that the scheme ends up being relied on to do a job it wasn't designed or empowered to do."

This dynamic has resulted in:

- Elevated expectations of enforcement and consumer protection outcomes
- Increased reliance on the Code as a proxy for regulatory oversight
- Blurred accountability between industry schemes and government

Insight: The Code is increasingly positioned as a policy substitute, creating structural misalignment between authority, responsibility and expectation.

Enforcement, consequences and accountability

Stakeholders raised concerns about the implications of enforcement decisions within a system where participation is effectively mandatory.

"If participation is effectively mandatory, then removal from the scheme can be business-ending…"

"Those are regulatory-scale consequences without regulatory-scale frameworks."

"We'd like to see it expand into customer protections, including banning door knocking and telemarketing."

This creates tension between:

- The absence of formal regulatory powers and safeguards
- The real-world consequences of compliance decisions

Insight: There is a growing mismatch between the significance of enforcement outcomes and the governance model supporting those decisions.

Data, intelligence and system learning

Stakeholders identified the NETCC as a valuable source of market intelligence, particularly through complaints, audits and compliance activities. Many stakeholders indicated that NETCC should more proactively engage with stakeholder or share insights to support industry wide improvement, identify issues and respond to systemic improvements.

"The complaints and compliance data is actually very useful for understanding emerging risks."

"There's real value in the intelligence NETCC has — the challenge is how that information is shared and acted on."

There was strong support for:

- Improved data-sharing across institutions
- Use of NETCC insights to inform policy and regulatory prioritisation

However, stakeholders cautioned that:

- Intelligence alone does not resolve system gaps
- Data must be linked to clear accountability and action pathways

Insight: The NETCC's intelligence function is a key asset, but its value depends on integration with broader system responses.

Scope, system boundaries and emerging risks

Stakeholders emphasised the importance of **disciplined scope management**, particularly as technologies and business models evolve.

"Not all of the problems… are really about sales practices — a lot… are about performance and system integration."

"There's a risk of expecting the NETCC to cover things that really belong in technical standards or regulation."

Key concerns include:

- Extending the Code into areas where consumer risk is unclear or difficult to define
- Duplication of regulatory or technical functions
- Creation of false consumer confidence

Insight: The Code is strongest when focused on early-stage consumer interaction (sales, disclosure, expectations), and less suited to technical performance or system integration issues.

Clarity of role and system positioning

Across interviews, there was strong alignment on the need for clearer articulation of the NETCC's role within the broader system.

"Greater clarity about what the NETCC is and isn't responsible for would help everyone…"

"The risk is the NETCC becoming the default answer to gaps in the system…"

Stakeholders consistently emphasised the importance of:

- Defining boundaries between industry schemes and regulation
- Ensuring accountability sits with appropriate institutions

- Avoiding over-reliance on voluntary mechanisms

Insight: Clarity of role is critical to maintaining credibility, effectiveness and appropriate expectations.

System-level risks and emerging dynamics

Stakeholders highlighted a set of evolving risks shaping the future of consumer protection in CER:

- Increasing complexity of bundled technologies and services
- Growing role of finance, contracts and long-term performance expectations
- Increasing scale of consumer exposure as uptake expands
- Lack of integrated, system-level accountability

These risks are characterised as:

- Cumulative
- Interdependent
- Not easily addressed through existing mechanisms

Insight: Consumer risk is shifting from individual transactions to system-level exposure, requiring more coordinated responses.

Overall conclusion

External stakeholder interviews reinforce that the NETCC is:

- A valuable and necessary component of the consumer protection ecosystem
- Operating effectively within its intended scope
- But constrained by structural limitations across the system

Stakeholders consistently indicate that the future effectiveness of the Code will depend on:

- Clearer articulation of its role relative to regulators and ombudsmen
- Disciplined management of scope and expectations
- Improved coordination across institutions, and;
- Avoidance of default reliance on the NETCC as a substitute for formal regulation.

Interviewees

A diverse selection of stakeholders was identified and approach to undertake an interview to share their understanding and perspective on the NETCC. This included federal, state and territory governments, industry and advisory groups, known supports and know opponents. The following organisations took part in the interview program.

- Clean Energy Regulator
- Clean Energy Finance Corporation
- Energy and Water Ombudsman of New South Wales
- Energy and Water Ombudsman of Victoria
- Energy and Water Ombudsman of Queensland
- Energy and Water Ombudsman of South Australia

- SEC Victoria
- Energy Policy WA
- Australian Energy Regulator
- Master Electricians Association
- Solar Victoria
- SolarQuotes
- Gippsland Climate Change Network

Appendix F: Stakeholder survey insights summary

This appendix presents a synthesis of findings from the Stakeholder & Non-Signatory Survey (n=6) conducted as part of the Independent Review of the New Energy Tech Consumer Code (NETCC). It captures perspectives from government/regulatory bodies, a finance provider, and a consumer advocacy organisation, providing system-level insight into the role, effectiveness, and future direction of the Code within the Consumer Energy Resources (CER) market.

The survey includes a very small number of respondents, but from highly influential stakeholder groups. Findings therefore provide qualitative, system-level insight, rather than representative evidence, and are best interpreted alongside consumer and seller data.

Respondent profile

- Stakeholder types:
  - Government / regulatory bodies (4 respondents)
  - Finance provider (1 respondent)
  - Consumer advocacy organisation (1 respondent)
- Organisation size: ranges from small (2–10 staff) to large (>200 staff)
- Geographic coverage: primarily national or multi-jurisdictional organisations
- NETCC familiarity:
  - Most respondents report being somewhat or very familiar with NETCC
  - One stakeholder (consumer advocacy) reported limited familiarity

The cohort reflects institutions that shape, oversee or rely on consumer protection frameworks, rather than direct market participants, providing a complementary "system perspective" on NETCC performance.

Role and value of NETCC in the broader consumer protection system

Stakeholders consistently position NETCC as addressing a gap in the broader consumer protection landscape, sitting between general consumer law and formal dispute resolution mechanisms.

"NETCC is a targeted scheme for these technologies providing consumers a clear pathway to raise complaints."

"Because there isn't other specific tools - the ACL is generic… Ombudsman schemes jurisdiction is generally limited."

Stakeholders also emphasised that industry codes can play a distinct role in proactive uplift, in contrast to regulatory enforcement that is often reactive:

"Industry codes have a role in industry uplift… whereas compliance/enforcement… are after-the-fact mechanisms."

Insight: NETCC is seen as valuable in principle, particularly as a targeted, sector-specific mechanism, however its effectiveness is highly dependent on how well it operates within the wider regulatory system.

Consumer risks and market challenges

Stakeholders identify a consistent set of priority consumer risks in the CER market:

- Misleading advertising and sales practices

- Confusion about finance, contracts and payback
- Product performance uncertainty
- Lack of follow-through on warranty/support
- Financial and credit risks
- Non-signatory behaviour undermining standards
- Emerging risks linked to new technologies (e.g. AI, new service models)

Insight: There is strong alignment between stakeholders and consumer/seller surveys that risk is increasingly concentrated in complex products, financing arrangements, and emerging service models, rather than traditional installation issues alone.

Effectiveness of consumer protection mechanisms

Stakeholders identified a mix of mechanisms influencing consumer protection outcomes, including:

- NETCC itself
- Australian Consumer Law (ACL)
- Ombudsman schemes
- State-based regulatory frameworks

However, responses indicate that these mechanisms do not operate consistently across jurisdictions and can leave gaps:

"Ombuds schemes vary state by state… you could… experience the same issue but have a completely different redress outcome."

"The dispute resolution continues to be a gap… especially consumers who have paid via transfer so have no redress."

Insight: Consumer protection is currently fragmented, with variable outcomes depending on jurisdiction, payment method and access to dispute pathways.

Enforcement, credibility and "teeth" of the Code

The most consistent and strongest theme across stakeholders is the need for stronger, more visible and more effective enforcement.

"It needs power to actually punish a supplier who breaks the rules. Suspensions are not enough of a stick."

"NETCC has no power to enforce the supplier to do anything."

"There needs to be greater consequence and accountability when standards not met."

Stakeholders also raised concerns about perception risk, where the Code may be seen as a compliance tick rather than a meaningful quality marker:

"It seems all suppliers get NETCC accreditation… it's not really that valuable anymore."

"Strengthen compliance… address criticisms that it's just a 'tick' on paper."

Insight: The credibility of the Code is seen to depend heavily on consistent enforcement, visible consequences, and robust entry and ongoing compliance standards. Without these, the Code risks losing its value as a signal of quality.

Alignment with government frameworks

Most stakeholders consider NETCC to be generally aligned with government policies and programs, albeit with some gaps.

Several respondents indicated that alignment is “mostly aligned, with some gaps”

Others noted that better alignment would strengthen the case for using NETCC as an eligibility mechanism for government schemes.

Insight: NETCC is viewed as a potentially critical policy instrument, but its alignment and credibility must be strengthened to support integration with government frameworks.

Future risks and emerging technologies

Stakeholders identified a range of emerging risks requiring attention, including:

- Battery finance and lending products
- AI-enabled energy management
- Subscription and service-based models
- Data, privacy and cyber risks
- CER optimisation services

Insight: There is a clear expectation that NETCC must evolve rapidly to address emerging market risks, particularly those that extend beyond traditional sales and installation issues.

Priority areas for improvement

Stakeholder feedback demonstrates strong alignment on a set of improvement priorities that are highly consistent with seller and consumer insights.

Opportunity for improvement	What stakeholders said (evidence)	Underlying issue
Stronger enforcement powers and consequences	“It needs power to actually punish a supplier…”; “Suspensions are not enough of a stick.”	Current enforcement is perceived as insufficient to deter poor practice or maintain credibility.
Higher bar for entry and ongoing compliance	“It seems all suppliers get NETCC accreditation…”	Perceived low barriers risk undermining trust in the Code as a quality signal.
More consistent and visible compliance oversight	“A higher proportion of safety and compliance checks… ensuring substandard businesses can't hide behind an accreditation ‘tick’.”	Limited auditing and visibility reduce confidence in the system’s effectiveness.
Improved complaints and dispute resolution pathways	“The dispute resolution continues to be a gap…”; “Needs to be access to the ombudsman.”	Existing pathways are fragmented and can fail to deliver consistent outcomes for consumers.

Greater transparency and public reporting	"Regular public reporting on outcomes"	Limited transparency reduces accountability and stakeholder confidence.
Stronger stakeholder engagement and awareness	"More visibility at industry events…"	Limited awareness and engagement reduce impact and uptake.
Governance and structural improvements	"streamlining the Panel and Council…"	Current governance arrangements may create unnecessary complexity or inefficiency.

Overall conclusion

The Stakeholder & Non-Signatory Survey highlights that NETCC is recognised as a necessary and valuable component of the consumer protection landscape, particularly in a complex and rapidly evolving market.

However, its effectiveness is seen as constrained by:

- Limited enforcement power and visibility
- Perceived variability in entry and compliance standards
- Fragmented consumer protection pathways across jurisdictions
- Emerging risks that extend beyond current Code scope

A clear and consistent message from stakeholders is that the NETCC must evolve to become a more robust, credible and system-integrated mechanism, with stronger enforcement, clearer accountability, and improved transparency to maintain its relevance and effectiveness.

Appendix G: Consumer survey insights summary

This appendix presents a synthesis of findings from the **Consumer Survey (n=25)** undertaken as part of the Independent Review of the New Energy Tech Consumer Code (NETCC). It provides evidence-based insights into consumer decision-making, information quality, experiences of supplier performance and installation, complaint pathways (including NETCC), confidence drivers, and priority opportunities to strengthen consumer protections as the CER market evolves.

Respondent profile (survey snapshot)

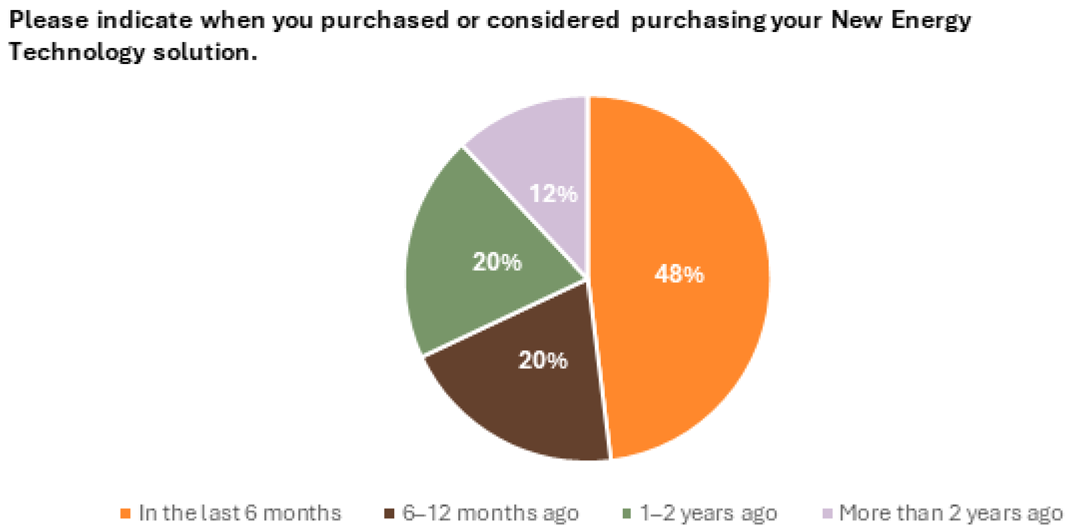
The consumer dataset is predominantly household-based and reflects recent decision-making in an active period of market and policy change.

Customer type: 92% household customers (23/25); 1 small business; 1 community/not-for-profit.

Timing: 48% purchased/considered in the last 6 months (12/25); the remainder are split across 6–12 months (5/25), 1–2 years (5/25), and >2 years (3/25).

Geography: Victoria (9), New South Wales (7), Western Australia (5), with smaller numbers from South Australia (2), ACT (1), Queensland (1).

Products considered/purchased: Home battery (23), rooftop solar (20), EV charger (7), energy management systems (5), VPPs (4).



The survey reflects a consumer cohort navigating a bundled and increasingly digitalised market (solar, batteries, EV charging integration, VPP considerations), where understanding and trust are shaped by both technical complexity and policy/incentive settings.

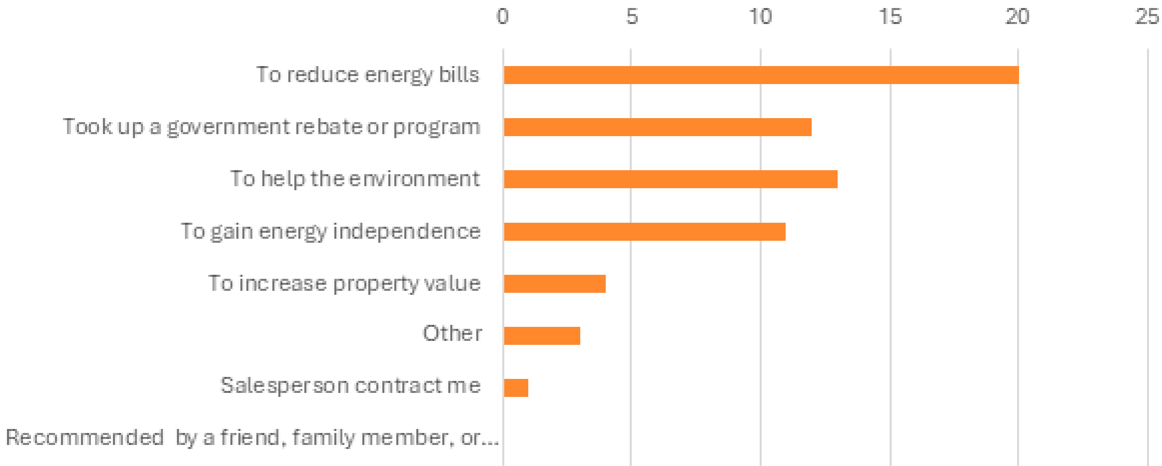
Drivers of purchase and adoption

Consumers reported a combination of financial, environmental and resilience motivations, with rebates a major adoption accelerator:

- **Reduce energy bills:** 80% (20/25)
- **Help the environment:** 52% (13/25)
- **Government rebate/program:** 48% (12/25)
- **Energy independence:** 44% (11/25)

Additional motivations include property value (4), EV charging at home (1), and other household/locational drivers (e.g., electrification preferences, supply constraints).

What were your main reasons for choosing your New Energy Technology solution? (Select all that



Insight: Consumers are primarily seeking cost and energy resilience outcomes, with policy incentives materially shaping timing and urgency (including reported pressure around scheme deadlines).

Awareness and visibility of NETCC in the consumer journey

A consistent finding is low consumer awareness and weak visibility of NETCC at the point of decision-making:

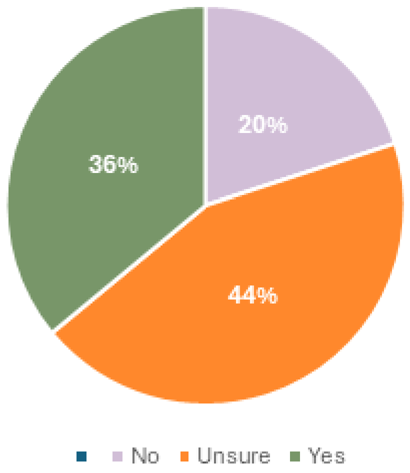
Familiarity with NETCC:

- Not familiar at all: 48% (12/25)
- Somewhat familiar: 32% (8/25)
- Heard of it but don't know much: 12% (3/25)
- Very familiar: 8% (2/25)

Whether the supplier was NETCC-approved (or displayed the badge):

- Unsure: 44% (11/25)
- Yes: 36% (9/25)
- No: 20% (5/25)

Was your supplier a NETCC approved provider? Did they display this badge.



Insight: Even where consumers may have engaged an Approved Seller, many are unable to identify NETCC membership. This suggests consumer recognition is currently inconsistent and not reliably functioning as a market signal at the point of purchase.

"If you are going to have an organisation such as NETCC then it needs teeth; having a framework that is based on pure vendor pays & gets membership plus meaningless consequences for shonky operators gives no confidence whatsoever to consumers"

"NETCC needs more stringent rules and background checks and to act faster to protect consumers. Too many stories of people caught out by bad installers that should have never been allowed to provide battery and solar"

"I've never had any experience with the NETCC. It has been a complete accident I even heard about the NETCC."

Information sources and clarity of pre-purchase information

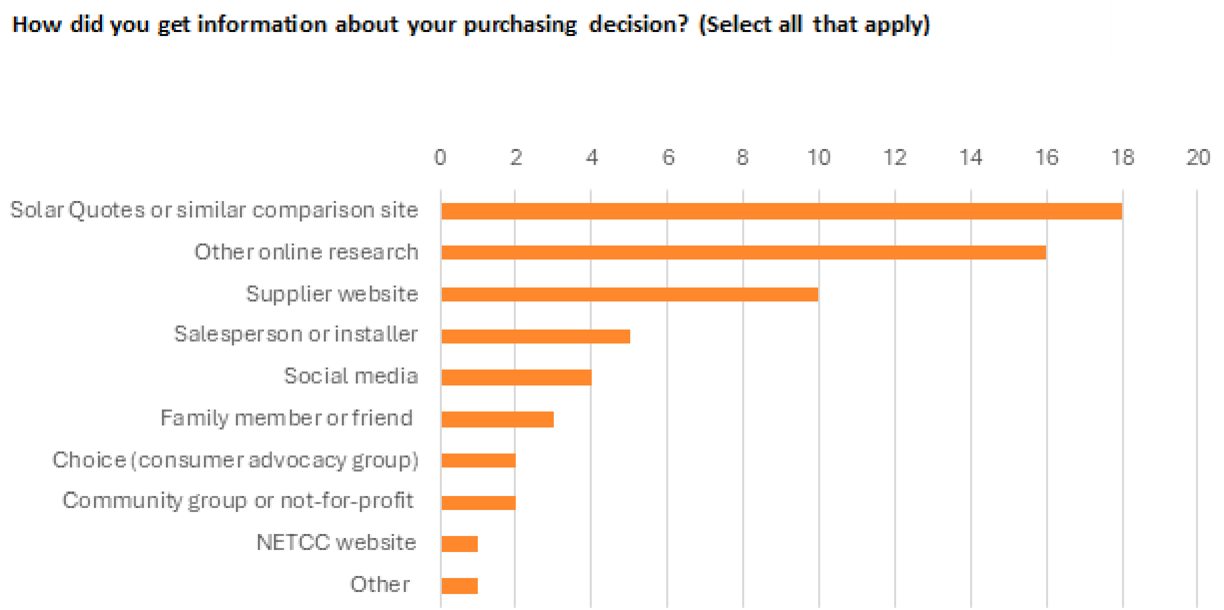
Consumers typically relied on a mix of comparison platforms and independent research, with supplier-provided information a secondary source.

Primary information sources:

- Comparison site (e.g., SolarQuotes-type): 72% (18/25)
- Other online research: 64% (16/25)
- Supplier website: 40% (10/25)
- Salesperson/installer: 20% (5/25)

Clarity of information before purchase:

- Somewhat clear: 52% (13/25)
- Extremely clear: 16% (4/25)
- Neutral: 16% (4/25)
- Extremely unclear: 8% (2/25)
- Somewhat unclear/confusing: 8% (2/25)



Qualitative responses indicate consumers want more decision-useful, practical information, including: clearer performance expectations (especially kWh realities and payback assumptions), improved explanation of system operation/optimisation, and more transparent timelines, rebates, and installation processes.

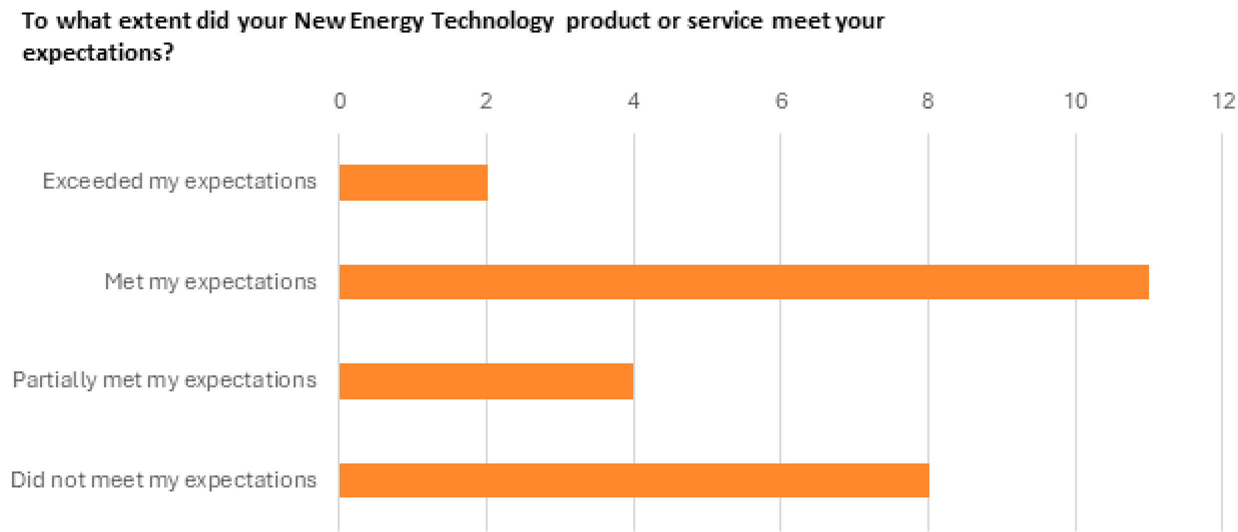
"It's a total marketing exercise. I used a small installer in a small town through word of mouth. The other installers I contacted who were on this marketing scheme offered far higher quotes for the same products."

"They made false promises that the installers couldn't do"

Expectations and delivery performance

Consumer experiences are mixed, with a material minority reporting outcomes below expectations.

- **Met expectations:** 44% (11/25)
- **Did not meet expectations:** 32% (8/25)
- **Partially met expectations:** 16% (4/25)
- **Exceeded expectations:** 8% (2/25)



Where expectations were not met, qualitative feedback commonly relates to:

- Misalignment between sales claims and delivered performance
- Delivery delays / incomplete installation
- Lack of post-install support and guidance on using apps/software
- Rebate timing pressures and uncertainty

"They made false promises that the installers couldn't do."

"No follow up assistance on operating the software. Difficult to contact anyone who could help."

Issues after installation and post-sale support

Reported issues indicate that consumer risk is not limited to sales conduct, but extends into installation quality, responsiveness, and performance support.

Most common issues selected:

- **No problems:** 32% (8/25)
- **Difficulty contacting support / assistance:** 24% (6/25)
- **Installation delays / incomplete work:** 12% (3/25)
- **Warranty / guarantee issues:** 12% (3/25)

Additionally, smaller numbers referenced systems not working as expected, performance issues, or not yet installed.

Insight: A notable share of reported issues relate to responsiveness and post-sale support, suggesting a consumer protection gap around the practical "after-sales service" experience, especially as systems become more software- and data-dependent.

Complaints and dispute pathways (including NETCC)

The majority of respondents had not made a complaint; where complaints occurred, they were often pursued outside NETCC.

No complaint needed: 68% (17/25)

Complaint via another organisation: 20% (5/25)

Complaint via NETCC: 12% (3/25)

Experience among NETCC complainants (n=3)

Within the very small sub-sample who reported complaining through NETCC:

- **Ease of lodging complaint:** 2 "extremely not easy"; 1 "extremely easy"
- **Helpfulness:** 1 "completely resolved"; 1 "did not help at all"; 1 "not applicable/unsure"
- **Explanation of next steps:** 2 "extremely unclear"; 1 "extremely clear"
- **Overall satisfaction:** 2 "very unsatisfied"; 1 "very satisfied"

"Being able to speak to someone."

"How do I make a complaint about a provider who has still not delivered and installed my battery that I have been asked to make a payment of $2600 for."

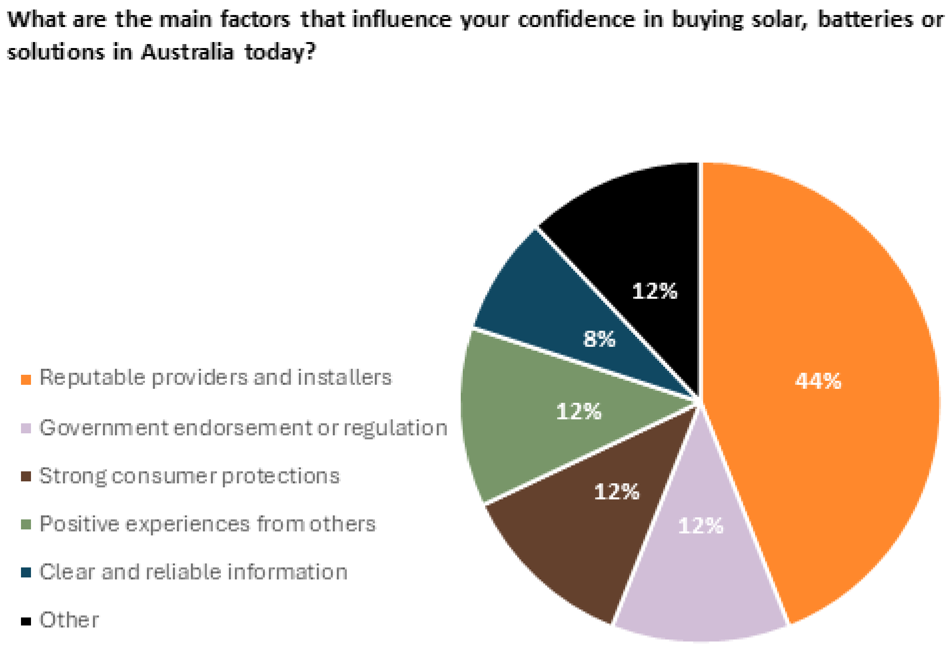
Insight: Complaint pathway effectiveness is shaped by two factors raised repeatedly in qualitative feedback:

- **Awareness** (many consumers do not know NETCC exists or how to use it), and
- **Accessibility** (desire for clearer guidance and direct contact, not just online processes).

Consumer confidence: current sentiment and what drives trust

Overall confidence in the quality and reliability of approved sellers is mixed and trends towards caution.

- Somewhat confident: 32% (8/25)
- Not very confident: 28% (7/25)
- Not confident at all: 24% (6/25)
- Very confident: 12% (3/25)
- Neutral: 4% (1/25)



What consumers prioritise to feel safer (ranked factors)

When asked to rank confidence-building factors, the most common first priority was clearer information before buying (10 first-ranked selections).

Across top-three priorities, consumers most frequently elevated:

- Stronger rules for salespeople and installers (appeared in top 3 in 18 responses)
- Clearer information before buying (16)
- Easier ways to get help when something goes wrong (14)
- Government backing/oversight (10)
- Better protections around finance (7) and well-monitored company standards (7)

"If you are going to have an organisation such as [NETCC] then it needs teeth…"

"More consumer protection. Regulation that actually has the power to act and shut down poor quality installers quickly."

Insight: Consumer confidence is driven less by voluntary badges and more by information quality, enforceable standards, accessible help pathways, and visible oversight.

Priority areas for improving consumer protections (consumer-led improvement agenda)

Consumer feedback demonstrates clear alignment on several priority areas for improvement. Collectively, these priorities point to a need to strengthen the NETCC as a visible, consumer-facing trust mechanism, with practical support for consumer decision-making and clearer accountability across sales, installation, and after-sales service.

Priority areas for improvement

Improvement theme	
Focus on clarity and decision-useful information before purchase	Consumers consistently prioritised clear, comparable, realistic information to support informed decisions. This includes: • more realistic explanation of expected performance (including variability and assumptions) • clearer explanation of kWh production/usage realities and payback expectations • clearer documentation of what "optimisation" and ongoing support should include • more transparent explanation of rebate timelines, conditions, and risks
Strengthen sales and installation standards (and ensure enforceability)	Consumers emphasised the need for stronger and more consistently enforced standards—particularly to prevent mis-selling, poor workmanship, and delivery failures. Common expectations include: • stronger rules for salespeople and installers • visible consequences for poor practice • practical safeguards where consumers feel exposed to claims they cannot verify
Create easier, clearer pathways to get help when something goes wrong	A recurring theme is that consumers want simple, well-signposted pathways for support and dispute resolution, including: • clearer information on how to make a complaint and what to expect • improved accessibility (including desire to speak to someone) • clearer explanation of next steps and timelines when a complaint is lodged
Increase visibility, oversight, and perceived "teeth" of the scheme	Several consumers questioned whether the scheme has sufficient authority or impact. This included perceptions that NETCC must either: • become a more visible and credible consumer protection mechanism (with enforceable consequences), or • be integrated with stronger government-backed enforcement pathways

Strengthen requirements for post-installation support and system operation guidance	As systems become more digital and multi-app dependent, consumers reported challenges understanding operation and optimisation. Consumers identified value in: • clearer requirements for handover, training and aftercare • enforceable expectations for post-install assistance and responsiveness • documentation that supports safe operation, maintenance and effective use

Overall conclusion

The Consumer Survey highlights that consumer confidence in the CER market is mixed and often cautious, shaped by concerns around information quality, installer performance variability, difficulty accessing support, and uncertainty regarding the effectiveness and visibility of consumer protection mechanisms.

The strongest consumer signal is that trust is built through:

- Clear, decision-useful information prior to purchase
- Enforceable standards and visible oversight
- Accessible support and complaint pathways
- Stronger expectations around aftercare and system operation support as technology complexity increases.

Appendix H: Approved Seller survey insights summary

This appendix presents a synthesis of findings from the **Approved Seller Survey (n=36)** undertaken as part of the Independent Review of the New Energy Tech Consumer Code (NETCC). It provides an evidence-based perspective on seller experience of the Code, including participation drivers, implementation challenges, perceived value, customer outcomes, and emerging risks within the Consumer Energy Resources (CER) market.

Respondent profile

The survey reflects a diverse but predominantly small-business cohort operating across the Australian CER market.

Business size:

- 67% (24 of 36) operate with 2–10 employees
- Approximately 28% (10 of 36) are mid-to-large businesses (11–200 employees)

Revenue profile:

- 44% (16 of 36) are Tier 1 ($0–1 million turnover), with remaining respondents distributed across higher tiers

Tenure:

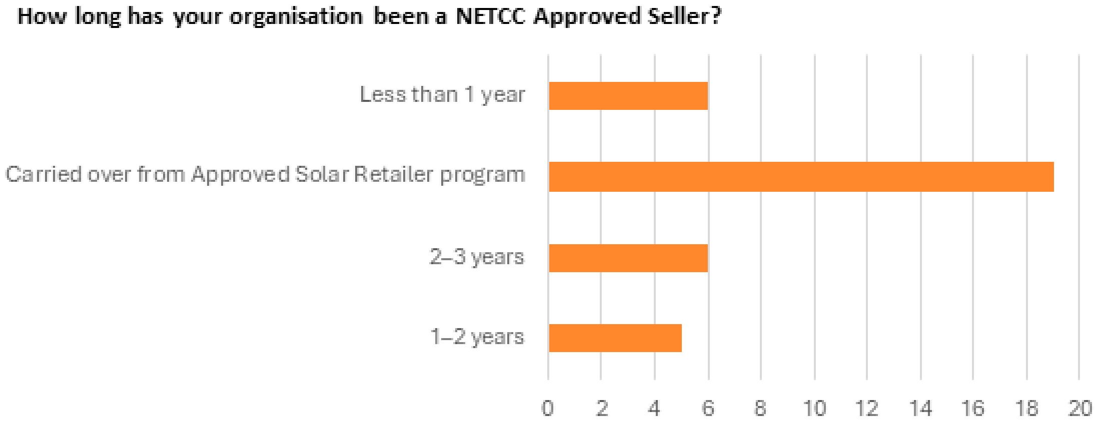
- 53% (19 of 36) transitioned from the Approved Solar Retailer program, indicating strong continuity from previous frameworks

Geographic distribution:

- Respondents operate nationally, with strongest representation from Victoria (22 responses), followed by New South Wales (14) and Queensland (14)

Products and services:

- Nearly all respondents supply rooftop solar and battery systems
- 61% (22 of 36) supply EV chargers, with smaller proportions engaged in energy management systems and VPP offerings



Interpretation: The respondent base reflects a small-business dominated market undergoing increasing technological integration and service complexity, with expanding exposure to bundled products and emerging service models. Respondents represent only small percentage of approved sellers approximately 2%.

Drivers of participation

Survey results indicate that participation in the NETCC is strongly driven by external policy settings, particularly government incentive programs.

92% (33 of 36) identified eligibility for government incentive programs as a primary reason for joining

Secondary motivations include:

- Consumer trust and brand recognition (50%)
- Commitment to high standards and ethical practice (50%)
- Industry expectation and peer influence (25%)

While many respondents acknowledged the Code's intent to uplift standards, qualitative feedback suggests participation is often instrumental rather than voluntary.

"Wasted cost to doing business. Only being used because of government incentive programs."

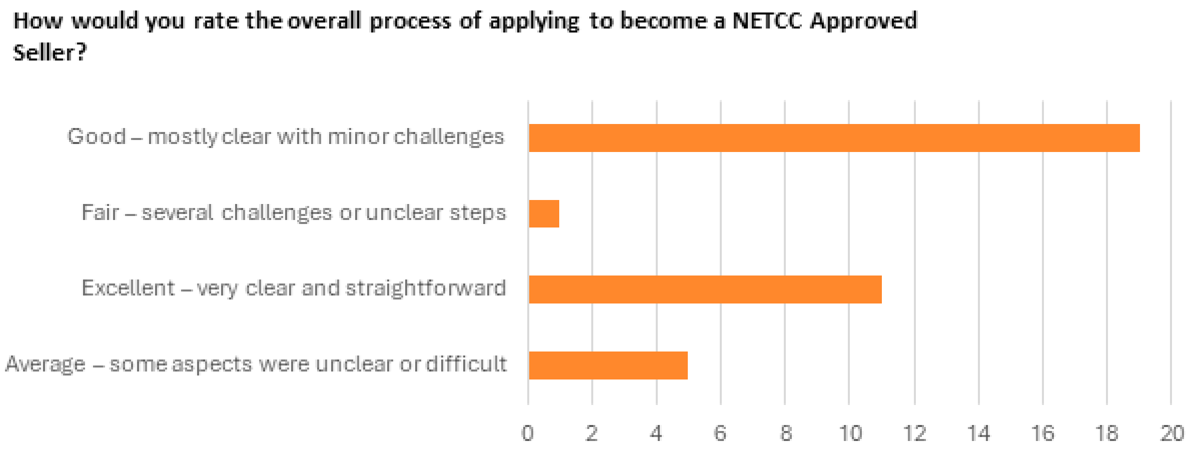
"Without being attached to Government rebate there is no advantage to being a signatory."

Insight: The Code currently operates, in part, as a gateway to market participation, with its value proposition closely linked to regulatory and funding frameworks.

Application and onboarding experience

Overall, sellers report that the onboarding process is generally functional and accessible:

- 83% (30 of 36) rated the application process as good or excellent



However, qualitative responses reveal inconsistent perceptions regarding the appropriateness and rigour of entry requirements.

Two contrasting perspectives are evident:

- Some respondents consider the process **insufficiently rigorous**, with concerns that low-quality operators are able to gain accreditation
- Others report **uncertainty and complexity**, particularly for smaller or newer businesses navigating compliance expectations

"Seems like anyone can become a NETCC member… the only reason you get members is to have access to rebates."

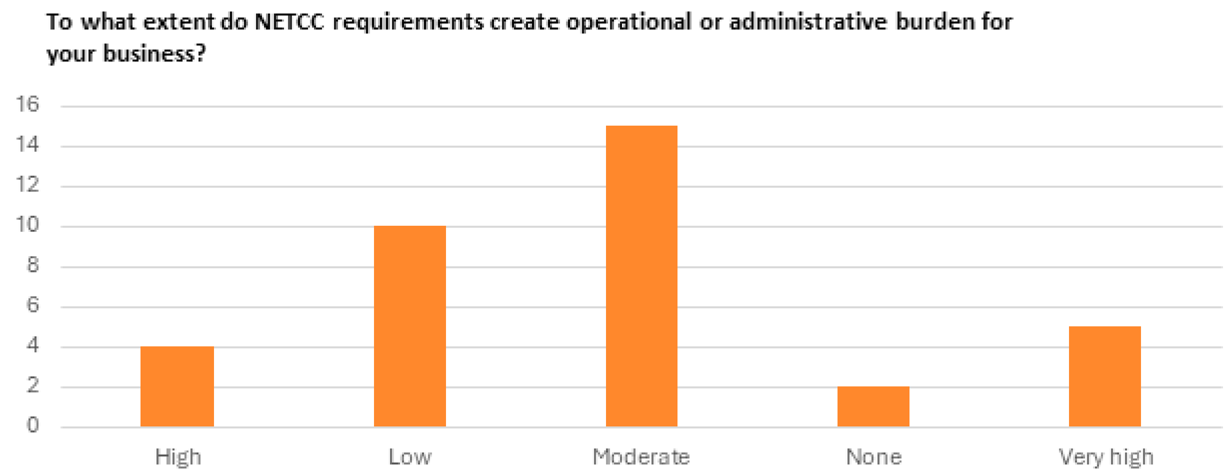
"The process is overly bureaucratic… written by people who do not work as installers."

Insight: These contrasting views point to a broader issue of confidence in the consistency and calibration of entry standards, rather than a singular concern regarding process design. This also reflect the diversity of operators that the NETCC covers and considerations for how to support businesses of different sizes and scales.

Compliance burden and implementation

The survey indicates that, while overall burden is most commonly described as moderate, experiences vary significantly across respondents:

- 42% (15 of 36) report a moderate administrative burden
- 28% (10 of 36) report low burden
- 25% (9 of 36) report high or very high burden



Key sources of burden

Qualitative responses highlight several recurring pressure points:

a. Documentation and evidence requirements
Administrative obligations relating to record-keeping, evidence capture and compliance documentation are frequently cited as resource-intensive, particularly where contractor networks are involved.

"Other companies not having to comply, regulatory burden – we basically need to be lawyers to comply fully."

"Less tick and flick approving low-end operators and more actual due diligence at the approval stage is required."

b. Contractual complexity and interpretation
Respondents report challenges in translating requirements into operational practice, particularly where guidance is perceived as overly legalistic.

"Too much legal mumbo jumbo in contract requirements – should be simplified."

c. Practical application in installation contexts
Some requirements are considered difficult to apply in real-world delivery environments, particularly where site conditions change during installation.

"It is impossible to provide all the documentation required and still operate viably."

Insight: Administrative burden is not uniformly experienced; rather, it is shaped by business scale, capability, and exposure to complex delivery models, including subcontracting arrangements.

Audit and complaints processes

Audit experience

- 31% (11 of 36) reported undergoing an audit or compliance check within the past 24 months
- 28% (10 of 36) indicated uncertainty regarding audit participation

Experiences of the audit process are mixed. While some respondents report constructive engagement, others identify limited transparency and insufficient feedback.

"We were requested to partake in the audit… and simply received an email saying the case was closed. This provided no insight or feedback."

Complaints and investigations

17% (6 of 36) reported involvement in complaint investigations

Feedback from these respondents highlights concerns regarding:

- Proportionality of investigative processes
- Administrative burden associated with documentation and evidence provision
- Perceived imbalance between retailer and contractor accountability

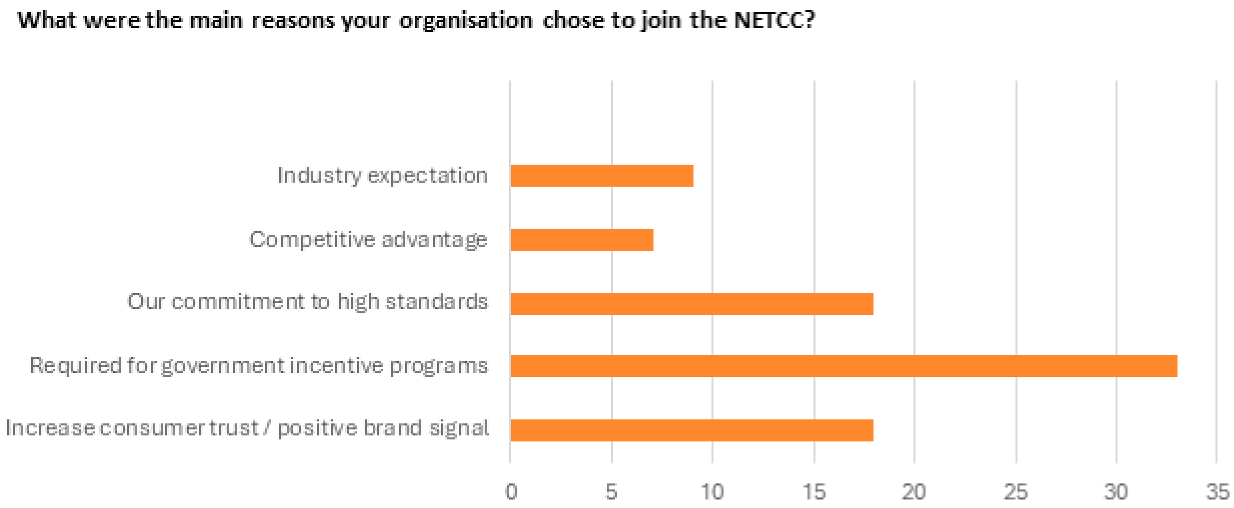
“Not to require the retailer to record each single tiny details of communication to prove innocent, as it is impossible to record the world event and still viable.”

Insight: While enforcement is recognised as necessary, there is a consistent call for more proportionate, transparent, and resolution-focused processes, particularly in relation to complaints.

Perceived value and impact

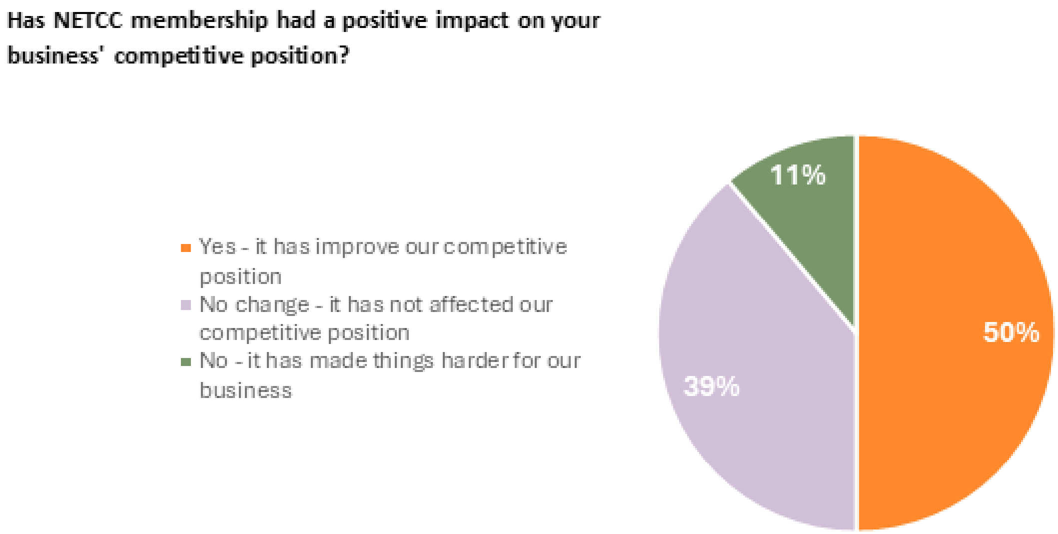
The perceived value of NETCC membership is **variable across respondents**:

- 33% (12 of 36) consider membership **very valuable**
- 25% (9 of 36) consider it **somewhat valuable**
- 25% (9 of 36) report a **neutral position**
- 17% (6 of 36) consider it **not valuable**



Impact on competitive position

When asked about the overall value the NETCC participation has had on their business 58% reported that it was very or somewhat valuable. Less than 15% noted it was not valuable at all.



Insight: While the Code delivers value for a proportion of participants, its impact is not consistently experienced as a strong differentiator in the market.

Qualitative responses indicate that perceived value is often contingent on:

- Alignment with incentive programs
- Consumer awareness of the Code
- Perceived enforcement against non-compliant operators

Customer outcomes

Respondents consistently identified the Code as influencing key drivers of customer satisfaction:

- Fair sales practices (58%)
- Clarity of information provided (56%)

followed by installation quality, warranties, and complaints processes

However, the most common customer concerns reported were:

- Delays or issues with installation (36%)
- Uncertainty regarding product performance and payback expectations (25%)

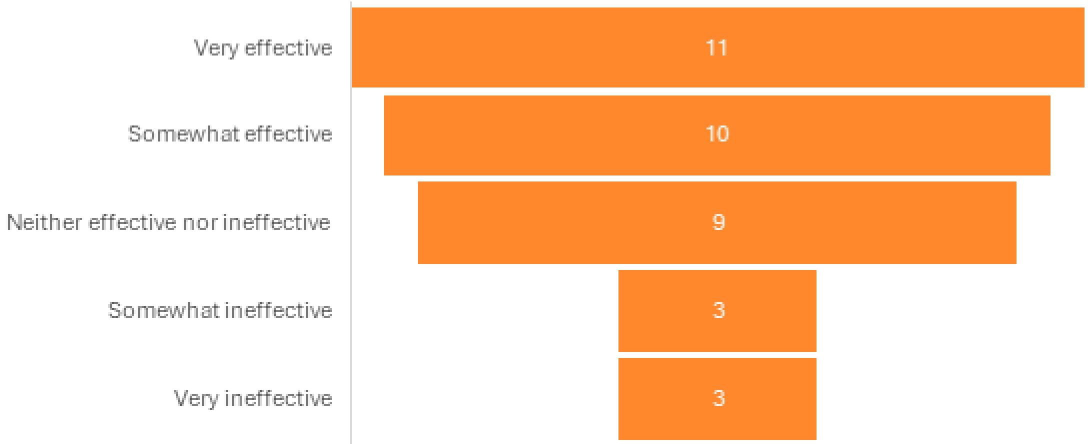
Secondary concerns include warranty issues and difficulty understanding solutions

Insight: There is a clear distinction between:

- Drivers of trust (sales clarity and transparency), and
- Drivers of dissatisfaction (delivery and operational performance)

This suggests that improving customer outcomes requires attention not only to sales practices but also to **end-to-end delivery and expectation management**.

From your perspective as an Approved Seller, how effective are NETCC requirements at supporting good customer outcomes?



Emerging risks and future considerations

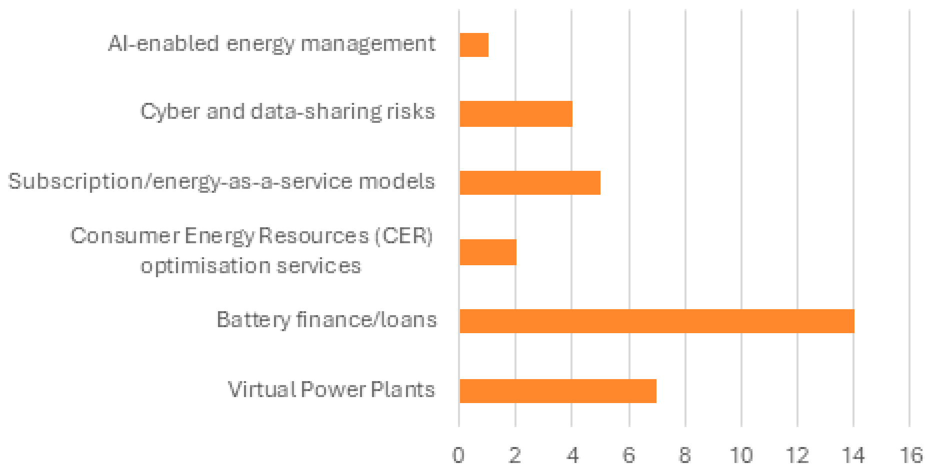
When asked about the future of the CER market, respondents were positive about in the strength of the sector with 75% confident in the future growth and stability.

When asked about which emerging technologies or business models pose potential risks for consumer protections, they were most concerned about battery finance and loan products (39%) and Virtual Power Plants (19%).

"Clearer requirements for finance and contract models."

"Expanded coverage for data, privacy, cyber."

Which emerging technologies or business models raise the biggest consumer protection challenges?



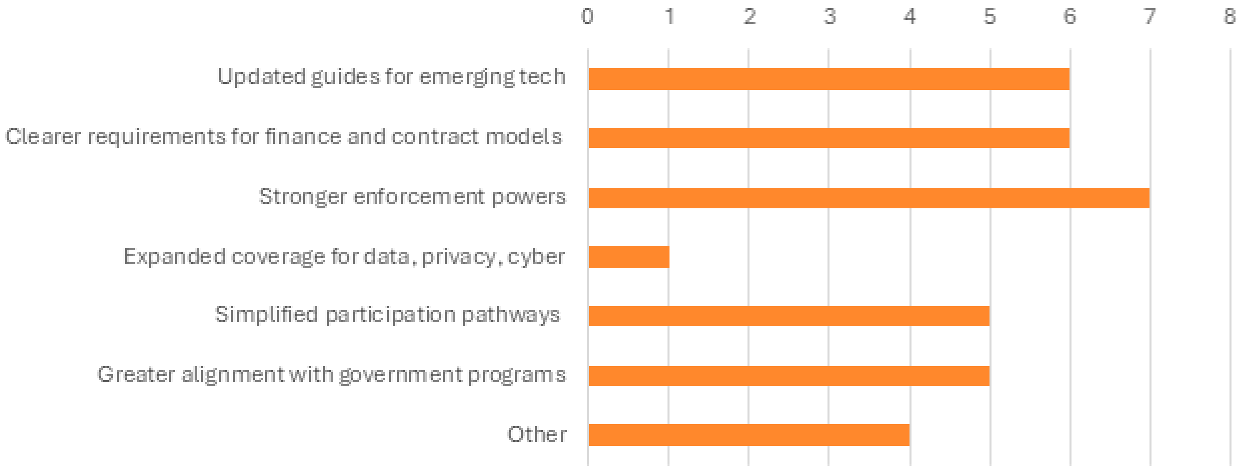
Insight: The risk profile of the sector is evolving beyond traditional installation issues to encompass financial, digital and service-based risks, requiring ongoing adaptation of the Code.

Priority areas for improving the Code

Feedback from Approved Sellers demonstrates a high degree of alignment on priority areas for improvement, with consistent themes across operational experience, compliance burden, and market evolution.

Taken together, these insights indicate a strong expectation that the NETCC should evolve from a primarily compliance-based framework toward a more practical, enabling and capability-focused system.

Which emerging technologies or business models raise the biggest consumer protection challenges?



Opportunity for improvement		Underlying issue
Simplification and clarity of requirements	Respondents consistently highlight the need for greater clarity, accessibility and usability of the Code, particularly in relation to contractual, disclosure and compliance requirements. A recurring concern is that elements of the Code are overly complex, legalistic, or difficult to interpret in practice, particularly for smaller businesses and installation-focused operators. “Do it in plain English… this document is meant to be for tradies and retailers, not contract lawyers.” In practical terms, sellers are seeking: • clearer articulation of what “good” looks like in practice, not just what is required • reduction in legal or technical language that obscures operational intent • improved consistency and coherence across different sections of the Code	The current structure requires sellers to interpret and translate requirements themselves, increasing the risk of inconsistent application and avoidable compliance burden.

	• more explicit guidance in areas where interpretation currently varies (e.g. performance assumptions, contract variations, documentation requirements)	
Standardised templates and practical implementation tools	There is a strong and consistent call for the NETCC to provide standardised, fit-for-purpose templates and tools that support compliance in day-to-day operations. "Provide a sample quote… publish examples… that retailers can use as a reference for compliance." Respondents emphasise that significant time and cost is currently spent developing internal documentation from first principles, including: • customer quotes and proposals • contract documentation • disclosure statements • complaints handling processes audit and evidence collection frameworks There is a particular need for: • standardised quote templates, including consistent pricing breakdowns • example contracts and disclosures aligned with Code requirements • practical checklists and compliance workflows • audit-ready documentation frameworks	The absence of standardised tools results in duplication of effort across the industry, inconsistent application of requirements, and increased risk of non-compliance.
Enhanced guidance, training and ongoing support	A significant proportion of respondents report limited engagement, guidance, or support following initial approval, resulting in uncertainty and self-directed interpretation of requirements. "There is no guidance, training and communications after we got the approval…" While the Code establishes expectations, sellers indicate a lack of ongoing capability-building support, particularly in relation to how requirements should be operationalised.	The current model is perceived as reactive and enforcement-focused, rather than proactively supporting sellers to meet and sustain compliance.

	Key areas of requested improvement include: • structured onboarding and post-approval support pathways • regular training sessions, webinars and updates • access to practical guidance materials and case studies • clearer process guidance for audits and compliance checks • improved responsiveness and availability of support channels Respondents also expressed interest in more interactive and proactive forms of engagement, including tools that provide real-time guidance or feedback on compliance.	
Stronger, more consistent and more targeted enforcement	There is broad agreement that the Code's credibility depends on more effective and visible enforcement, particularly in relation to poor-performing or non-compliant operators. Respondents expressed concern that: • lower-quality or non-compliant operators are able to enter or remain in the system • enforcement is not sufficiently visible or consistent across the market • compliant businesses are disproportionately burdened relative to those operating outside or at the margins of the Code Qualitative feedback highlights the importance of: • raising the bar at entry, including more robust vetting processes • ensuring ongoing compliance is monitored and enforced consistently • greater focus on targeting systemic or repeat non-compliance	Without consistent and credible enforcement, the Code risks being perceived as administratively burdensome for compliant businesses, without sufficiently constraining poor practice across the sector.

	"Less tick and flick approving low-end operators and more actual due diligence at the approval stage is required."	
Greater proportionality and fairness in compliance and complaints processes	While respondents recognise the importance of compliance oversight and complaints handling, there is a strong and consistent call for more proportionate, transparent and balanced processes. Key concerns relate to: • the administrative burden associated with investigations • perceived adversarial tone or approach in some interactions • limited recognition of good-faith efforts to resolve issues • insufficient differentiation between isolated incidents and systemic non-compliance "Not to require the retailer to record each single tiny detail… it is impossible… and still viable." Respondents consistently advocated for: • resolution-first approaches, allowing issues to be addressed before escalation • greater recognition of business scale and operational context • clearer delineation of responsibility between retailers, installers and third parties • improved transparency and feedback during audit and investigation processes	Processes are not consistently experienced as proportionate or outcomes-focused, which can reduce trust and increase compliance burden for businesses acting in good faith.
Cross-cutting insight	Across all priority areas, a consistent theme emerges: Sellers are not seeking a reduction in consumer protection standards — they are seeking a system that is clearer, more practical, and more effective in supporting compliance and improving outcomes.	

This points to a shift in expectation from the NETCC as:

- a compliance and enforcement mechanism, toward
- a capability-building, standard-setting and market-shaping framework
- with stronger alignment between:
    - policy intent
    - operational implementation
    - and real-world market conditions

Overall conclusion

The Approved Seller Survey indicates that the NETCC is recognised as an important mechanism for promoting minimum standards and consumer protection. It is functioning effectively in establishing baseline expectations and supporting industry accountability.

However, its impact is constrained by structural and operational factors, including:

- Reliance on government incentives as a participation driver
- Uneven perceived value across participants
- Administrative complexity in implementation
- Limited availability of practical compliance support

Looking forward, there is clear evidence of a shift in stakeholder expectations. Approved Sellers are seeking a Code that not only enforces compliance, but also actively supports capability, consistency, and adaptation to emerging market risk.

Appendix I: Reference documents

Key documents and references utilised through the Review include the following.

Regulatory & Government Sources

ACCC (Australian Competition & Consumer Commission) https://www.accc.gov.au/public-registers/authorisations-and-notifications-registers/authorisations-register/new-energy-tech-consumer-code-0

Submission by Energy & Water Ombudsman schemes (EWOV, EWON, EWOSA, EWOQ) https://www.accc.gov.au/system/files/public-registers/documents/Submission%20by%20Energy%20and%20Water%20Ombudsman%20schemes%20%28EWOV%2C%20EWON%2C%20EWOSA%2C%20EWOQ%29%20-%2017.10.25%20-%20PR%20-%20AA1000702%20NETCC_0.pdf

ACCC authorisation register – NETCC https://www.accc.gov.au/public-registers/authorisations-and-notifications-registers/authorisations-register/new-energy-tech-consumer-code

Federal / State Energy Policy

National Consumer Energy Resources Roadmap (2024) https://www.energy.gov.au/sites/default/files/2024-07/national-consumer-energy-resources-roadmap.pdf

Solar Victoria – NETCC Mandate. https://www.newenergytech.org.au/articles/netcc-mandated-by-solar-victoria-2

QLD Solar for Renters program – NETCC requirement. https://www.newenergytech.org.au/articles/qld-solar-for-renters-program-requires-netcc

PV Magazine Australia – Victorian standards article. https://www.pv-magazine-australia.com/2023/04/27/victoria-mandates-new-standards-for-solar-and-battery-retailers/

Consumer & Ombudsman Evidence

EWON Insights Energy Complaints. https://www.ewon.com.au/page/publications-and-submissions/reports/EWON-Insights/ewon-insights-oct-dec-2023/complaints-this-quarter

Consumer Protection WA. Solar installation consumer warning. https://www.consumerprotection.wa.gov.au/announcements/surge-solar-system-installations-not-without-consumer-issues

Media & Public Sentiment Sources

ABC News Investigations.

Door-to-door solar sales investigation. https://www.abc.net.au/news/2025-04-08/solar-door-to-door-accc-complaint/105094468

“Dodgy solar panels” consumer protection investigations. https://www.abc.net.au/news/2022-09-28/dodgy-solar-panels-spur-calls-for-greater-consumer-protections/101478300

NETCC–Related Programs, Governance & Compliance

NETCC Program & Compliance. NETCC compliance activity & breach listings. https://www.newenergytech.org.au/compliance-activity

NETCC Annual Report 2024 summary. https://www.newenergytech.org.au/articles/netcc-annual-report-2024

NETCC Quarterly Compliance Report (Apr 2023–Sept 2025). https://assets.newenergytech.org.au/uploads/NETCC-Quarterly-Compliance-Report-Apr-Jun-2023.pdf

Industry & Market Insights

Clean Energy Council (CEC) Resources. CEC Approved Solar Retailer program. https://cleanenergycouncil.org.au/industry-programs/retailers/approved-solar-retailer-program

CEC Batteries & products program. https://cleanenergycouncil.org.au/industry-programs/products-program/batteries/battery-programs

SolarQuotes Industry Analysis. NETCC compliance analysis. https://www.solarquotes.com.au/blog/netcc-compliance-2024-mb3097/

DWS Energy, NETCC Review 2026: What It Really Means for Solar Customers https://www.dswenergy.com.au/post/netcc-review-2026-what-it-really-means-for-solar-customers

SolarQuotes, The NETCC Is Running A Review: Tell Them It's Toothless https://www.solarquotes.com.au/blog/the-netcc-is-running-a-review-tell-them-its-toothless/