



# **Inquiry into renewable and affordable energy for apartments**

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## About Housing for the Aged Action Group (HAAG)

Housing for the Aged Action Group (HAAG) is a member-based, community organisation specialising in the housing needs of older people. HAAG has more than 1,000 members across Australia actively working towards achieving housing justice. Established over 40 years ago as a grassroots movement, HAAG has developed a robust service delivery arm in Victoria and has a strong presence in advocacy for older people experiencing housing and homelessness related issues across Australia. During the 2024-25 financial year, HAAG supported over 2,600 older Victorians.

HAAG provides support and assistance to older Victorians experiencing homelessness or housing stress, including those living in range of multi-unit housing types, such as:

- Private rental apartments
- Public and community housing apartments
- Residential parks
- Retirement villages
- Caravan parks
- Independent Living Units

As such, HAAG welcomes the opportunity to provide input into the Legislative Assembly Environment and Planning Committee [Inquiry into renewable and affordable energy for apartments](#).

*Our submission primarily responds to terms of reference (b) barriers and inequities experienced by Victorians in such dwellings, including renters and social housing tenants, when accessing renewable and affordable electricity compared with other households.*

This submission is based on our experience delivering housing and aged care related support services to older people, research, and lived experiences of older people experiencing housing stress or homelessness in Australia. It draws on the experiences of older people living in all the above housing types. We especially acknowledge the contributions to this submission made by members of HAAG's lived experience advisory groups, particularly the Older Renters Working Group and the Retirement Accommodation Action Group.



## Summary

The older people HAAG assists survive on low or fixed incomes, most commonly the Age Pension, and predominantly live in housing they do not own. Energy affordability, energy efficiency, and access to renewable energy are increasingly raised as critical issues affecting their ability to age safely and with dignity. However, older renters and residents in low-income retirement housing remain largely excluded from Victoria's energy transition.

HAAG commends the Victorian Government for recent reforms requiring higher standards of amenity, thermal comfort and energy efficiency in rental properties,<sup>1</sup> along with the work underway to install energy efficient appliances in public housing, and air conditioning units in some public housing.

However, people living in apartments and multi-unit dwellings, particularly renters, continue to face numerous barriers to accessing renewable and affordable electricity. As a result, they are unable to share the financial and health benefits, and those most in need of lower cost electricity are least able to obtain it. We commend the Parliament for examining how best to expand access to renewable and affordable electricity for Victorians in these dwellings.

Without targeted action, Victoria's energy transition risks reinforcing existing housing and income inequalities. Affordable, renewable energy is not a privilege of home ownership. It is essential infrastructure for health, dignity, and the right to age safely in place.

HAAG urges the Inquiry to ensure that older people - particularly renters and residents without choice or control - are placed at the centre of Victoria's energy future.

## Recommendations

1. The Victorian Government enforce rules to make more homes energy efficient: Expedite the introduction and rigorous enforcement of the newly legislated minimum energy efficiency standards (insulation, draught-proofing, heating, cooling, etc.) to address the health and safety risks in existing properties, with clear compliance targets for older housing stock.
2. The Victorian Government improve pricing transparency, consumer protections, and access to dispute resolution for people in embedded networks, including actioning the

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<sup>1</sup> <https://vcoss.org.au/essential-services/2025/06/embracing-an-electric-future-will-benefit-all-victorians/>



remaining recommendations from the Embedded Networks Review to transition customers onto regular individual energy plans

3. Streamline processes for energy concessions and rebates to ensure they are applied to energy bills before residents pay their account.
4. Improve the ability of public housing to withstand extreme heat events, with a priority on 55+ public housing stock, by:
  - Investing in upgrades such as insulation, draught proofing, screen doors, overhead fans and other measures that do not require significantly more costly energy consumption by tenants.
  - Ensuring any air conditioning installed in public housing is appropriate and fit for purpose.
  - Continuing to electrify public housing properties and transition from gas.
5. That embedded networks be banned at community housing developments that house public housing renters relocated from the high-rise towers. Where it is impossible to avoid embedded networks, that only the State Electricity Commission should be engaged to supply electricity.
6. The Victorian Government ensure that programs designed to improve access to renewable and affordable energy are applied equally to public housing and community housing.
7. The Victorian Government explore arrangements to support retirement housing settings and/or residents to access solar energy.
8. Retirement housing providers be required to ensure transparent power arrangements, including: fee structures (that comply with the Victorian Default Offer), how solar power is used, and maintenance schedules.
9. Require all managers of multi-unit dwellings, including the operators of community housing, retirement villages, caravan parks, residential parks, and owners corporations to meaningfully consult with residents regarding energy infrastructure decisions, to ensure residents can share in the benefits of renewable and affordable energy.
10. The Victorian Government support the upgrade of pre-1990s apartments by:
  - Prioritising infrastructure upgrades for pre-1990s apartments with a majority of low-income households, particularly those where older people live.
  - Developing assistance for owners corporations to understand upgrading options, along with a retrofitting grants program.



## Context

Safe, affordable, accessible and long-term housing is fundamental to healthy ageing and the wellbeing of older people. However, decades of inadequate action and under-investment by all levels of government and private sector have resulted in housing being treated as an investment vehicle rather than a home. This in turn has distorted the housing market pushing many people, especially people on low to moderate incomes into housing precarity.

Despite the assumption that older people own their own home when they retire, this not the reality for increasing numbers of older people. Increasing numbers of older people are retiring with mortgages or as private renters. An increasing number of older people are experiencing homelessness, at risk of homelessness, or in housing stress. They are retiring into insecure and unstable housing, and the number experiencing this is only continuing to grow.

While they are among the most in need of access to affordable renewable energy, their capacity to access it is severely constrained.

Key demographic shifts:

- Over the past decade there has been a 77% increase in older people renting privately in Victoria, and this number will continue to rise.
- At least 85,000 Victorians over 55 are renting privately in the lowest two income quintiles.<sup>2</sup>
- Since 2023, the median rent in Victorian dwellings increased by \$100 from \$420 to \$520 in 2025.<sup>3</sup> Income support payments have not kept pace with rental increases, placing the majority of the older renters at risk of severe rental stress, experiencing, or at risk of, homelessness.
- 22.7% older people are still paying off a mortgage.<sup>4</sup>

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<sup>2</sup> W. Stone et al, Ageing in a Housing Crisis: Older people's housing insecurity & homelessness in Australia (Commissioned by Housing for the Aged Action Group), 2023, accessible at:

[https://www.oldertenants.org.au/sites/default/files/decades\\_of\\_decline\\_2011-21\\_victoria.pdf](https://www.oldertenants.org.au/sites/default/files/decades_of_decline_2011-21_victoria.pdf)

<sup>3</sup> Australian Bureau of Statistics: Latest insights into the rental market, 2025, accessible at:

<https://www.abs.gov.au/articles/latest-insights-rental-market>

<sup>4</sup> W. Stone et al, Ageing in a Housing Crisis: Older people's housing insecurity & homelessness in Australia (Commissioned by Housing for the Aged Action Group), 2023, accessible at:

[https://www.oldertenants.org.au/sites/default/files/decades\\_of\\_decline\\_2011-21\\_victoria.pdf](https://www.oldertenants.org.au/sites/default/files/decades_of_decline_2011-21_victoria.pdf)



## Energy affordability and health

Older people are disproportionately affected by extreme weather events such as heatwaves. A recent Australian Institute of Health and Welfare (AIHW) report found that age increased hospitalisations and deaths as a result of weather-related injuries, with over half the deaths (52%) related to extreme weather of people over 65 years.<sup>5</sup>

Prohibitive power costs result in older people not using heating in winter or cooling in summer, risking their health as they are unable to make their homes energy efficient. The vast majority of non-homeowners have little control over improvements that make the biggest difference to costs, such as insulation, solar or other energy efficient fixed appliances.

According to *Sweltering Cities Summer Survey Report*, older renters are more likely to feel unwell during heatwaves than the general older population (87% compared with 62%), are less likely to have air conditioners in their homes, and if they do, are less likely to turn them on due to prohibitive costs.<sup>6</sup>

## Priced Out, Run Down: connections with unaffordable and poor-condition housing

Research HAAG released in late 2025 – *Priced Out, Run Down: Older Australians in unaffordable and poor-condition housing* - illustrates the impact of increasing and overlapping forms of housing precarity on older people, particularly on their health and wellbeing.<sup>7</sup>

*Older adults are especially susceptible to the impacts of poor housing, given age-related vulnerabilities and reduced capacity to undertake repairs or relocate. These risks are particularly pronounced in rental housing, where physical dwelling standards tend to lag behind owner-occupied stock (White et al., 2021). Addressing housing problems can be difficult due to costs, weak tenant protections, or restrictions on modifications – factors that can prolong exposure to poor conditions.*

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<sup>5</sup> Australian Institute of Health and Welfare, Let's talk about the weather: injuries related to extreme weather, 2023, accessible at: <https://www.aihw.gov.au/reports/injury/extreme-weather-injuries/contents/about>

<sup>6</sup> Sweltering Cities, Summer Survey Report, 2024, accessible at: <https://swelteringcities.org/2024/04/04/summer-survey-2024/>

<sup>7</sup> <https://www.older tenants.org.au/publications/priced-out-run-down-older-australians-in-unaffordable-and-poor-condition-housing>



Key groups most affected are:

- Private renter households, especially those in unaffordable and poor-condition homes, who report: greater financial hardship; negative impacts on wellbeing, particularly on physical and mental health, financial circumstances, and social life; and higher residential mobility, shorter lease agreements and limited control over housing decisions.
- Mortgaged households in unaffordable poor-condition homes who report financial hardship and compromised wellbeing outcomes, though they tend to move less frequently and live in larger dwellings.
- Women, in both mortgaged and privately rented homes
- Single-person households, particularly in private rental housing
- People living in dwellings built before 1990, who are more likely to experience poor housing conditions and related problems.

Participants in poor condition dwellings, across both mortgaged and private rental households, commonly reported difficulty keeping homes warm or cool, along with issues such as leaks, flooding or plumbing problems and pest infestations. People living in unaffordable, poor condition dwellings, both private rental and mortgaged homes, also reported poorer physical and mental health.<sup>8</sup>

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<sup>8</sup> <https://www.older tenants.org.au/publications/priced-out-run-down-older-australians-in-unaffordable-and-poor-condition-housing>



## Barriers, inequities and impacts

Older people living in apartments and other multi-unit dwelling face a number of barriers to accessing renewable and affordable energy. Along with the cost of upgrades and improvements, which are out of reach of most people on low incomes, older people living in these settings have little or no choice or control over whether renewable and affordable energy is available to them. These barriers are described below, along with recommendations to address them.

### 1. Energy affordability and cost pressures

Older people on low and fixed incomes are particularly exposed to rising energy costs. For those on the Age Pension, energy bills compete directly with rent, food, medication, and transport.

Many older people HAAG assists already practice extreme energy rationing. High bills are not the result of excessive usage, but of inefficient buildings and systems they cannot change.

*“When it’s a cooler night I leave the window a little open. The window is up high so it’s safer. I don’t have security door or flyscreens, and the door is on the footpath, so I can’t leave them open when it’s cooler. At 8am I shut the window, put the blinds down and keep it dark, to keep the apartment cooler. When it’s very hot I have an air-conditioner but I only put on for 30-40 minutes because it costs too much” – HAAG client Jean, 75 years old, living in private rental paying two-thirds of her aged pension on rent.*

The lack of insulation, inefficient heating, and poor building design in many older apartment blocks leads directly to higher energy costs, with no pathway for tenants to reduce them.

#### Recommendation 1

**The Victorian Government enforce rules to make more homes energy efficient: Expedite the introduction and rigorous enforcement of the newly legislated minimum energy efficiency standards (insulation, draught-proofing, heating, cooling, etc.) to address the health and safety risks in existing properties, with clear compliance targets for older housing stock.**



## 2. Embedded energy networks

Embedded networks are a major source of concern for older people living in many forms of multi-unit developments, including apartments, both private rental and community housing, retirement villages, caravan parks, residential parks and Independent Living Units.

In an embedded network the manager of a multi-unit housing development (eg apartments or retirement housing) buys electricity from the main grid distributors and then on-sells it to residents.

Embedded networks have the potential to provide cheaper power to residents through bulk purchasing arrangements and access to renewable energy. However, as considered in the Embedded Networks Review<sup>9</sup>, too often, this does not occur.

For older people, these arrangements often result in:

- Barriers to choosing their own retailer to access better offers
- Limited transparency
- Fewer consumer protection, including weak dispute resolution pathways
- Higher costs

*‘Lots of residents in the village don’t believe the electricity charge is equal to the VDO [Victorian Default Offer]. There’s no way of knowing if the rate is at the VDO level’ – HAAG Retirement Accommodation Action Group member.*

Older people also report significant difficulty obtaining the energy concessions they are entitled to in settings with embedded networks. As their meters are not directly connected to the main grid distributor, concessions are not applied directly to their electricity bill. Instead, they have to pay the full amount upfront, then undertake a convoluted process of an annual concession application.<sup>10</sup>

Older residents, particularly those with limited digital access or English as a second language, are disproportionately affected by complex contracts and opaque billing practices, despite being one of the groups most in need of affordable energy.

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<sup>9</sup> <https://engage.vic.gov.au/embedded-networks-review>

<sup>10</sup> <https://www.ewov.com.au/fact-sheets/concessions-and-grants>



For more detail about the challenges faced by older people with embedded networks, see Housing for the Aged Action Group's [submission to the Embedded Networks Review \(Draft Recommendations Report\)](#).<sup>11</sup>

## **Recommendation 2**

**The Victorian Government improve pricing transparency, consumer protections, and access to dispute resolution for people in embedded networks, including actioning the remaining recommendations from the Embedded Networks Review to transition customers onto regular individual energy plans**

## **Recommendation 3**

**Streamline processes for energy concessions and rebates to ensure they are applied to energy bills before residents pay their account.**

### **3. Lack of choice and control**

#### **Private rental apartments**

Older renters have almost no control over energy efficiency or renewable energy access. Even when government incentives exist, renters require landlord consent, which can be refused or ignored.<sup>12</sup>

In the current private rental market, with almost no properties affordable to people on low incomes, older renters report being afraid to request upgrades and modifications due to fears of:

- Rent increases
- Leases not being renewed
- Retaliatory treatment

*Heyab (name has been changed) is an older woman relying on JobSeeker payment who lives in a one-bedroom private rental property in Victoria... She finds that she is*

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<sup>11</sup> <https://www.older tenants.org.au/publications/submission-the-embedded-networks-review>

<sup>12</sup> <https://www.energy.vic.gov.au/households/electric-and-efficiency-standards-for-buildings/energy-efficiency-for-rental-properties-in-victoria#:~:text=Solar%20for%20rentals.-,Did%20you%20know?,benefits%20of%20efficiency%20and%20electrification.>



*paying more money for basic necessities to compensate for the unrepaired issues around the home. When she raised these issues with the landlord, she was told she can leave if she does not like the property. She is reluctant to raise issues due to fear of a rent increase or being evicted. — HAAG case study*

This power imbalance effectively excludes older renters from Victoria’s renewable energy transition. See Recommendation 1, above, for our recommendation to address this issue.

#### **4. Public and community housing apartments**

Older residents in public and community housing often live in apartment buildings with very **poor thermal performance**. While residents do not control the infrastructure, they bear the cost consequences through high energy bills and uncomfortable living conditions.

While large-scale upgrades are possible in these settings, tenants are rarely consulted, and savings are not always clearly passed on.

##### **Recommendation 4**

**Improve the ability of public housing to withstand extreme heat events, with a priority on 55+ public housing stock, by:**

- **Investing in upgrades such as insulation, draught proofing, screen doors, overhead fans and other measures that do not require significantly more costly energy consumption by tenants.**
- **Ensuring any air conditioning installed in public housing is appropriate and fit for purpose.**
- **Continuing to electrify public housing properties and transition from gas.**

**Embedded networks** (see above) are a significant concern for older people living in community housing, preventing them from being able to access the energy market and chose the lowest cost provider.

Older public housing residents are being impacted by the program of demolition of the 44 high rise public housing towers, particularly the seven older person’s towers announced for demolition in January 2026. In the public housing towers their electricity is individually metered, allowing them to choose their provider, access lower prices on the market, and have concessions directly applied to their bills. However, many residents will be relocated



to community housing developments that have embedded networks. Impacted older residents are already deeply concerned about what this means for the cost of electricity.

*‘We will be receiving a very big "energy shock" if we move into community housing blocks that are being built at present. We know that already there have been issues with residents of some of the new community housing projects having to pay excessive rates. Embedded energy providers have been installed in these new estates. Residents do not have the ability to choose their provider. I live with Chronic Obstructive Pulmonary Disease (COPD) and often I need to use an air purifier. I will need to factor this into my decision as to whether to move into a new community housing property.*

*I use an overhead fan in my lounge kitchen area. Overhead fans are cheap to run.*

*What is needed is more information about the entire embedded energy provider sector. What regulations govern the sector?’ – HAAG Older Residents Working Group members, and resident of an older persons tower being redeveloped*

*‘I live in one of the older person’s high rises that is being demolished, and they are suggesting we move into [nearby community housing]. But with it comes the news that it has embedded electricity and they told us that our bills will be going up significantly...Already half the people here don’t use air conditioning in summer because of the cost’. – HAAG Older Residents Working Group members, and resident of an older persons tower being redeveloped*

HAAG supports the recommendation in the Victorian Public Tenants Association submission to this inquiry to limit the impact of embedded networks in the community housing developments older people are relocated to:

### **Recommendation 5**

**That embedded networks be banned at community housing developments that house public housing renters relocated from the high-rise towers. Where it is impossible to avoid embedded networks, that only the State Electricity Commission should be engaged to supply electricity.**



The Victorian Public Tenants Association submission to this inquiry has also identified **inconsistencies in the way government programs** supporting access to renewable energy are applied to public and community housing. For example:

- The ‘Community Housing Program, Solar Victoria’ allows not-for-profit community housing organisations to apply for a rebate of up to \$1,400 per tenancy on behalf of their renters to install solar panels on the properties they manage. However, there is no similar program assisting the installation of solar panels on public housing apartments.
- The Energy Efficiency in Social Housing Program, jointly funded by the Commonwealth<sup>13</sup>, aims to improve the energy efficiency and liveability of social housing properties across Victoria. However, in Victoria solar panels are not included in the program while in other states they are.

### **Recommendation 6**

**The Victorian Government ensure that programs designed to improve access to renewable and affordable energy are applied equally to public housing and community housing.**

## **5. Retirement housing settings – retirement villages, residential parks, caravan parks**

Many residents in these multi-unit retirement housing types are connected to embedded energy networks, limiting their ability to choose retailers or benefit from competition.

Older people living permanently in residential parks and caravan parks are among the most energy-vulnerable Victorians. Despite this, residents often express concern about:

- Unclear billing practices
- Inability to change providers
- No say in renewable energy decisions

Where solar panels are installed in retirement housing the power generated may be used for communal purposes. However, operators often do not disclose how the power is used,

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<sup>13</sup> Under the Federal Social Housing Energy Performance Initiative (SHEPI)  
<https://www.dcceew.gov.au/energy/programs/social-housing>



and if there is any benefit to individual residents. Residents have suspicions that solar generated power is sold into the grid, with profit accruing to the operator not the residents or the village as a whole.

*‘There are panels on the shed, and several batteries, that supposedly feed into the grid at the caravan park. But no information is provided to residents about how much of this electricity subsidises residents’ power. The solar was also meant to be a backup for the gates and water pump if the mains power goes down. But when there’s an outage we have to operate the gates by hand and there’s a generator for the water. Where there’s renewable power residents need to be given information about what that’s for – is it for subsidising residents, or for specific roles like common facilities, or is it fed back into the grid for income for the park owner?’ – HAAG Retirement Accommodation Action Group member*

The ability to install solar panels, and benefit from renewable affordable energy, is restricted in retirement housing. In these settings, residents need consent from the operator to install solar panels, which is often refused because village operators worry about becoming responsible for the maintenance of the solar panels for the next resident.

Despite paying ongoing fees, residents frequently have no control over how energy systems operate or whether savings flow to them.

### **Recommendation 7**

**The Victorian Government explore arrangements to support retirement housing settings and/or residents to access solar energy.**

### **Recommendation 8**

**Retirement housing providers be required to ensure transparent power arrangements, including: fee structures (that comply with the Victorian Default Offer), how solar power is used, and maintenance schedules.**



## 6. Exclusion from renewable energy programs

Most renewable energy programs are designed around home ownership or individual dwelling control. As a result, the many low-income older renters and residents in apartments, retirement villages, residential parks and caravan parks are systematically excluded.

This exclusion entrenches inequality by:

- Locking in higher energy costs
- Undermining health and wellbeing
- Preventing older people from sharing in public investment benefits

A just energy transition must recognise that lack of ownership does not mean lack of need, and support initiatives that mean all Victorians can share in the benefits of renewable and affordable energy.

### Recommendation 9

**Require all managers of multi-unit dwellings, including the operators of community housing, retirement villages, caravan parks, residential parks, and owners corporations to meaningfully consult with residents regarding energy infrastructure decisions, to ensure residents can share in the benefits of renewable and affordable energy.**

## 7. Ageing infrastructure

The lower cost apartments many older people live in – either as renters, owned with a mortgage, or owned outright – are often old,<sup>14</sup> and unable to handle the increased power required to install solar power and electrical appliances such as induction cookers and heat pumps. These aged buildings require new meters and wiring, a significant cost that low-income owners and residents are unable to meet. Without financial assistance to upgrade electrical infrastructure residents of these dwellings will be excluded from the financial and health benefits of moving to renewable power, and shifting off gas.

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<sup>14</sup> <https://www.older tenants.org.au/publications/priced-out-run-down-older-australians-in-unaffordable-and-poor-condition-housing>



## **Recommendation 10**

**The Victorian Government support the upgrade of pre-1990s apartments by:**

- **Prioritising infrastructure upgrades for pre-1990s apartments with a majority of low-income households, particularly those where older people live.**
- **Developing assistance for owners corporations to understand upgrading options, along with a retrofitting grants program.**