Establishing a regulatory framework for retail customer initiated gas abolishment GRC0086

Submission to the Australian Energy Market Commission

December 2025

60 Leicester Street,
Carlton Vic. 3053
0422 974 857
admin@dea.org.au
www.dea.org.a

About Doctors for the Environment Australia

Doctors for the Environment Australia is an independent, non-government organisation of medical doctors in all Australian states and territories.

DEA's work is based on the premise that humans need a future with clean air and water, healthy soils capable of producing nutritious food, a stable climate, and a complex, diverse and interconnected humanity whose needs are met in a sustainable way. We are therefore interested in environmental protection and restoration to promote human health and social stability.

Acknowledgement of Country

Doctors for the Environment Australia's members live and work around Australia. We would like to acknowledge Aboriginal and Torres Strait Islander peoples as the Traditional Owners of these lands, in the spirit of reconciliation.

We recognise that First Nations peoples have cared for Country and lived sustainably for millennia, and that sovereignty of this land was never ceded. We pay our respects to First Nations Elders past and present, and to emerging leaders.

Summary

Doctors for the Environment Australia (DEA) supports the Australian Energy Market Commission's intention to define standard rules for gas service disconnection and abolishment. However, the documents as published are far from clear.

The health aspects of domestic gas use are our principal concern, and there is convincing evidence of health harm from exposure to gas combustion products.[1] A very large number of Australians are exposed to this in their homes, so anything that makes the disconnection process easier and cheaper for customers will have health benefits.

Recommendations

- Rules should clearly define a **cheap way to disconnect** from the gas network that does not require the customer to keep paying a gas fee.
- Only the absolute **minimum efficient cost of abolishment** services should be levied on users who choose to abolish their connection
- Rules should specify an **efficient and prudent way of leaving the network**, to avoid gas companies inflating the cost as a way of keeping customers.
- Disconnection costs of those that leave the network should **not be paid for by remaining customers**, in the interests of equity.
- Establishing the **cheapest, safe method of disconnection** should be based on real world data on the safety risks of leaving meters turned off, but pressurised, for a 10 year period.

- Network operators should be required to **document these incurred costs** and be able to demonstrate that the service was provided prudently and efficiently in line with the rest of their normal business activities.
- Disconnection costs to customers should **not include any profit or levy** on top that goes to the network operators.
- The determined minimum efficient costs should be shown to **not be a barrier to electrification** of customers' homes.

In detail

Health effects

Combustion products from gas appliances cause several well recognised health risks from exposure to indoor pollutants, especially nitrogen dioxide, carbon monoxide and formaldehyde. These pollutants pose a higher risk to health in modern, tightly weather-sealed buildings, as little fresh air enters.[2]

The most commonly seen health problem in which gas has a role is asthma, especially in children. A review of available literature showed the risk for children of having current asthma was 1.42 times higher for children in households with a gas stove, compared to those without a gas stove.[3] Applying this to the Australian context showed that indoor gas accounts for 12% of the attributable risk of asthma in Australian children.[4]

Carbon monoxide is a dangerous, colourless, odourless gas produced when carbon (including gas) is burned incompletely, which can happen easily with faulty appliances, especially heaters. The presence of carbon monoxide is often not suspected in the home, resulting in chronic ill health at low levels. At higher levels, carbon monoxide can become rapidly life-threatening.[5]

Need for realistic risk assessment

The cheapest option for customers no longer wishing to use gas is to turn off the meter and close their account. The more thorough option of removing the meter and all associated pipes can be very expensive as it will involve digging up footpaths and roadways. To dig up every gas connection in the street one by one is a very wasteful and inefficient process that would create huge costs.

The rule change proposal from the Justice and Equity Centre suggests that leaving meters in place creates a safety hazard, but this has not been quantified in any of the documentation. The gas meters in one DEA member's street have been in place for 100 years and there has never been a gas fire or explosion.

The safety risks of leaving meters in place but locked off, for the remaining ten or twenty years that there will be gas in the pipes, should be able to be quantified by suitable experts. The risks of leaving meters in place must be balanced against the risks of moving them, and assessed against the billions of dollars it would cost to remove them one by one.

The work of setting rules for the pricing of gas disconnections is incomplete without this quantitative analysis of the best way to do it.

Full consumer disclosure

Consumers who elect to connect to the gas network, should be informed there is no guarantee that there will necessarily be the ongoing availability of a gas network in the long term. This consideration is also relevant to those purchasing new gas appliances.

This will assist customers make a more realistic assessment of the likely eventual financial costs of investing in gas infrastructure and appliances at this stage of the energy transition.

Enabling low cost disconnection from reticulated gas

While total abolishment of gas connections is an important issue, it is more important to ensure the wide availability of a rapid and cheap process to disconnect gas supply to homes at the gas meter when requested by users, independent of a further abolishment process.

Disconnecting from reticulated gas should be easy, cheap and fast – it is the most efficient way for customers to protect members of their household from exposure to the noxious combustion products from gas appliances. This process also ends ongoing daily connection fees charged by gas network operators, independent of the amount of gas a household uses or does not use. Connection fees for remaining connected to reticulated gas is an economic impost even on households who change to all electric energy use.

In the event that many households in specific areas undergo disconnection, it will eventually be in the financial interest of the network operator to cease the supply of gas completely to that area, street or suburb. This would be a more efficient, simpler and overall cheaper method of 'abolishment' of supply.

It is important that the absolute minimum efficient cost of abolishment services only are levied on current gas network users who choose to abolish their connection. Network operators should be required to document these incurred costs and be able to demonstrate that the service was provided prudently and efficiently in line with the rest of their normal business activities. Costs to customers should not include any profit or levy on top that goes to the network operators.

Our approach is consistent with two other proposed rule change requests by Energy Consumers Australia and the Justice Equity Centre – *Depreciation (GRC0082)* and *Accelerated depreciation and redundancy (GRC0088)*. We agree that in the interests of equity and fairness, rule changes should remove the risks and costs of network depreciation from falling on the shoulders of consumers who have been good faith customers of the gas network providers, often for many years. The costs of accelerated depreciation should at least be shared equally by the network operators, and maintenance of operator profits should not be protected at the cost of consumers.

The determined minimum efficient costs to customers should also be shown to not be a barrier to electrification of their homes and businesses. This could be demonstrated, for example, by a customer feedback process such as surveys relating to the proposed costs.

Not creating barriers to electrification is the most important outcome. It is vital that customers and the wider community are allowed to protect their health and wellbeing by removing fossil gas from their homes, as

well as support the urgently needed electrification transition to reduce greenhouse gas emissions and slow global heating.

References

1. Doctors for the Environment Australia. *Fossil Fuels Are a Health Hazard*. Doctors for the Environment Australia; 2024. Accessed December 9, 2025. https://www.dea.org.au/fossil_fuels_are_a_health_hazard_report

2. Energy Safe Victoria. Heating your home with gas: always stay safe while staying warm. April 24, 2024. https://esv.vic.gov.au/safety-education/gas-safety-at-home/heating-your-home-with-gas/

3. Lin W, Brunekreef B, Gehring U. Meta-analysis of the effects of indoor nitrogen dioxide and gas cooking on asthma and wheeze in children. *Int J Epidemiol*. 2013;42(6):1724-1737. doi:10.1093/ije/dyt150

4. Knibbs LD, Woldeyohannes S, Marks GB, Cowie CT. Damp housing, gas stoves, and the burden of childhood asthma in Australia. *Med J Aust*. 2018;208(7):299-302. doi:10.5694/mja17.00469

5. Raub JA, Mathieu-Nolf M, Hampson NB, Thom SR. Carbon monoxide poisoning — a public health perspective. *Toxicology*. 2000;145(1):1-14. doi:10.1016/S0300-483X(99)00217-6