

Dear Mr Kelly

Thank you for your submission on the Draft National GreenPower Accreditation Program: Program Rules, Version 8, 2012. The National GreenPower Steering group (the Steering group) considered your submission and decided that no changes to the draft of the Program Rules were necessary at this time. Please find below a response to each of the points raised in your submission.

#### **The National Carbon Offset Standard**

The National Carbon Offset Standard (NCOS) is administered and controlled by the Commonwealth Government. It is outside the jurisdiction of the Steering group, which is entirely made up of State Government participants, to determine how the NCOS should be worded or administered.

Any claims made within the GreenPower Program Rules are merely a representation of the guidelines stipulated by the administering authority of the NCOS.

#### **The National Greenhouse and Energy Reporting System**

The National Greenhouse and Energy Reporting System (NGERS) is administered and controlled by the Commonwealth Government. Calculations under the NGERS Act are outside the jurisdiction of the Steering group, which is entirely made up of State Government participants. We recommend that any comments you have in relation to GreenPower and the NGERS Act be directed to the relevant Commonwealth Government authority.

#### **Treatment of System Losses**

The Steering group is satisfied with the methodology used by the Clean Energy Regulator to calculate system losses in relation to Large-scale Generation Certificates.

#### **Treatment of Blends of 'Green' and Other Energy**

The concept of a 100 per cent renewable product that does not contain 100 per cent GreenPower, but the relevant proportion of GreenPower plus the Renewable Power Percentage, being accredited under the GreenPower Program has been discussed by the Steering group and with GreenPower Providers. This is flagged as an issue for future consideration.

#### **Misleading Conduct**

The Steering group believes that the current wording of this clause provides adequate protection to consumers through the ability of the Program Manager to apply the currently accepted position of the market, as well as consumer protection groups, to

GreenPower advertising by GreenPower Providers. Should the position relating to emissions claims change, there is scope within the current clause to address this. Based on this assessment, the Steering group does not believe any change is required to this clause.

**Carbon Pricing**

The Steering group has released a fact sheet on this issue on the GreenPower website. We also continue a dialogue with industry and government in an ongoing attempt to further clarify the issue.

The Steering group would like to thank you for taking the time and effort to send such a detailed submission. Your submission, as well as this response, will be published on the GreenPower website shortly.

For further information, please contact Mr Gary Eisner, Program Manager, GreenPower, on (02) 8281 7314, or email [gary.eisner@dwe.nsw.gov.au](mailto:gary.eisner@dwe.nsw.gov.au)

Yours sincerely

**Andrew Lewis**  
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**Division of Resources and Energy**