

**Response to Submissions on proposed amendment
to section 3.7 of the Program Rules V8**

Submission from: Origin Energy

| Issue Raised | Steering Group Response |
|---|---|
| Prefer date for clearing the GreenPower Designated Account (GPDA) is changed from 15/2/13 to 20/2/13. | Date has been extended to 25 Feb 2013. |
| Clarification sought on whether the Program Manager (or their delegate) will be validating each LGC in the GPDA and the consequences of having non-GreenPower LGCs in the GPDA? | <p>The proposed rule change does not change the audit methodology used by the Program Manager's auditor. It is the responsibility of the Provider's auditor to validate each LGC in the GPDA. The Program Manager's auditor conducts a 'second' check to confirm the validity of LGCs.</p> <p>Should an error be discovered by the Program Manager's auditor (e.g. over/under surrender or non-eligible LGCs), Providers will be instructed to make the necessary adjustment. Once the Program Manager is satisfied that the correct adjustment has been made, Providers will receive written confirmation from the Program Manager to offer for voluntary surrender all of the LGCs held in the GreenPower Designated Account.</p> |
| <p>For clarity, suggest that last bullet point in Section 3.7 is reworded. For example:</p> <p><i>"Transactions in the GreenPower Designated Account will only be permitted between 1 January and 31 March. Transactions outside of this period require the written approval of the Program Manager".</i></p> | Agree to the proposed rewording. |

Submission from: Simply Energy

| Issue Raised | Steering Group Response |
|---|---|
| <p>Implementation: Concerned that there may be insufficient time to remove all LGCs from GreenPower Designated Accounts by 15/2/13. To achieve this, Simply Energy will need to set up a new REC-Registry account (which may take a number of weeks).</p> | CER has indicated that Providers may set up an additional REC Registry account via the REC Registry website and the account can be created in a matter of minutes. The REC Registry Technical Support helpdesk may assist in this matter. However, the Steering Group agrees to extend the deadline to 25 Feb 2013. |
| <p>Account access: It is unclear whether the steering Committee is proposing to require Providers to allow "view" access to the designated account only, or</p> | It is already a requirement for Providers to grant the Program Manager 'view access' to offers of voluntary surrender (approved in V8 of the Program Rules) and the proposed amendment to Section 3.7 of the Rules does not change this requirement. This user permission will only be used by the Program Manager (or its appointed auditor) to view |

| | |
|---|--|
| <p>whether permission to offer LGCs for voluntary surrender is also requested. Simply Energy requests clarification as to the exact access proposed. Provision of access beyond “view” access poses a commercial risk to the business, and as such would not be supported by Simply Energy.</p> | <p>offers of voluntary surrender in order to assist the verification process.</p> |
| <p>Procedural inconsistencies with other environmental certificate schemes in Australia.</p> | <p>The proposed amendment to section 3.7 of the Program Rules is intended to be an interim solution to address the concerns of the CER. The Program Manager will be working with the CER over the coming year to try and develop a more streamlined process for Providers.</p> |