

National GreenPower™ Accreditation Program

Annual Compliance Audit for 1 January 2011 to 31 December 2011

A Report for the National GreenPower Steering Group
Prepared by Clear Environment Pty Ltd

March 2013



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1. Introduction

1.1 Background

The National GreenPower™ (GreenPower) Accreditation Program (the Program) was established in 1997 to support the growth of the renewable energy industry in Australia. The aim of the Program is to encourage the installation of new GreenPower generation facilities through increasing consumer demand and confidence in accredited GreenPower Products. This is achieved by allowing eligible electricity and credit providers, known as GreenPower 'Providers' under the Program, to provide consumers access to electricity produced from renewable sources (via the purchase of Large-scale Generator Certificates (LGCs)).

The Program is offered through a joint collaboration of participating government agencies in New South Wales (NSW), Victoria (VIC), Queensland (QLD), South Australia (SA), Australian Capital Territory (ACT) and Western Australia (WA) and is governed by the National GreenPower Steering Group (NGPSG). NSW Department of Trade and Investment (NSW Trade and Investment) is the GreenPower Program Manager – Accreditation, and is responsible for administering the Program of behalf of the NGPSG.

Each year an audit is conducted by an independent organisation to determine the compliance of GreenPower accredited Products against criteria set out in the National GreenPower Accreditation Program: Program Rules (Program Rules) see Appendix 2. The objective of this audit is to evaluate the compliance of GreenPower accredited Products offered by GreenPower accredited electricity and credit providers against the Program Rules.

NSW Trade and Investment appointed Clear Environment Pty Ltd (Clear Environment) to conduct the annual technical audit of GreenPower Products under the Program for the 2011 Settlement Period, which covers 1 January 2011 to 31 December 2011.

This report includes details of each of the GreenPower Products offered by GreenPower Providers during the 2011 Settlement Period, and includes relevant verified data relating to GreenPower sales to customers and the surrender of LGCs. Detailed findings of the audit are commercial-in-confidence.

1.2 Scope of Audit

The scope of the audit is to assess the compliance of GreenPower Products accredited under the GreenPower Program against technical and marketing criteria set out in sections 3 and 4 of the National GreenPower Accreditation Program: Program Rules Version 7.0 (January 2011).

The technical criteria are detailed in Section 3 of the Program Rules, and include:

- 3.1: Technical auditing of Annual Audit Report Forms by an independent, suitably qualified auditor;
- 3.2: Use of GreenPower approved Generators;
- 3.3: Changes to the GreenPower Products and Generators;
- 3.4: Minimum percentage requirement of accredited GreenPower in blended Products;
- 3.5: Claims of eligible generation for GreenPower Products;
- 3.6: Balancing GreenPower supply and demand;
- 3.7: Transfer and surrender of Large-scale Generation Certificates (LGCs);
- 3.8: Eligibility of LGCs;
- 3.9: Shortfall in LGCs;
- 3.10: GreenPower Provider purchase of GreenPower Products; and

- 3.11: Treatment of system losses.

The marketing criteria are detailed in Section 4 of the Program Rules, and include;

- 4.1: Introduction;
- 4.2: Compliance review;
- 4.3: GreenPower Provider's intellectual property;
- 4.4: Provision of information to customers;
- 4.5: Use of GreenPower logo;
- 4.6: GreenPower Product disclosure label
- 4.7: Treatment of blends of 'Green' and other energy; and
- 4.8: Misleading conduct.

An overview of the technical and marketing criteria is provided in Section 2.2 of this report.

1.3 Audit Methodology

The audit has been conducted in accordance with the methodology documented in Clear Environment's proposal dated 30 March 2012, which was approved by the GreenPower Program Manager – Accreditation. This methodology was further developed based on subsequent discussions between Clear Environment and the GreenPower Program Manager. An overview of the methodology is provided as follows:

- **Update the GreenPower Provider and GreenPower Generator Audit Templates:**
 - The GreenPower Program Manager provided Clear Environment with a list of GreenPower Products offered during the 2011 Settlement Period including the contact details of the GreenPower Providers, plus a list of GreenPower Accredited Generators and their contact details.
 - The GreenPower Provider and GreenPower Generator templates were updated to ensure that all necessary data and information was captured. Clear Environment worked in collaboration with the GreenPower Program Manager to update the templates, and provided a draft version of the updated templates to the Program Manager for comment and feedback prior to distribution.
 - Clear Environment ensured the templates were consistent with the relevant version of the National GreenPower Accreditation Program - Program Rules: Version 7, January 2011. Any changes made to the Program Rules since the previous version were to be taken into consideration.
 - Clear Environment was not required to gather data relating to Technical Criteria 3.3 and 3.11, or Marketing Criteria 4.1, 4.3 and 4.8 of the Program Rules.
 - Clear Environment reviewed the guidance for the independent auditors regarding the independent audit statement.
- **Distribute and Receive Forms and Liaise with Generators and Providers:**
 - The GreenPower Provider templates were distributed to all GreenPower Providers that offered GreenPower Products during the 2011 Settlement Period. Guidance for the independent auditors regarding the auditor statement was sent to GreenPower Providers. The GreenPower Generator template was distributed to selected Generators as identified by the GreenPower Program Manager. Only those accredited Generators that received accreditation during the 2011 settlement period

or had accreditation for only parts of their generation were required to complete GreenPower Generator templates.

- Clear Environment liaised with Providers and Generators by telephone and email, responding to queries in relation to completing of the audit reporting form, and other audit related queries.
- Clear Environment followed up on any late submissions. Requests for a deadline extension were forwarded to the Program Manager for consideration.
- **Desktop Review of Completed GreenPower Provider and Generator Returns**
 - Clear Environment undertook a desktop review of independently audited GreenPower Provider Returns to determine compliance with the Program Rules. Generator Reports were collated and used to check the GreenPower Provider claims of eligible LGC surrenders. Clear Environment informed Providers and Generators of non-compliance(s) with the Program Rules that were identified during the audit, and they were given the opportunity to correct the non-compliance(s). An agreed period was given to Providers and Generators to rectify the non-compliance(s). Material amendments to the Provider Returns were required to be signed-off by the independent auditor prior to re-submission to Clear Environment.
- **Preparation of the Public Report:**
 - This technical audit report was prepared for public release. This report contains data for each GreenPower Product offered during the 2011 Settlement Period and includes information about the Products offered and verified data relating to GreenPower sales to customers and the surrender of LGCs. This report contains the audit opinion of Clear Environment, and the audit opinions of the independent auditors engaged by the GreenPower Providers.
- **Preparation of the Commercial in Confidence Report:**
 - This is a detailed technical audit report that contains commercial-in-confidence information. The report includes a full assessment of each Provider against the technical criteria in Section 3 of the Program Rules, an assessment of compliance with the marketing criteria in Section 4 of the Program Rules, the audit opinion of the independent auditors that conduct the audits of the GreenPower Products, plus the audit opinion of Clear Environment.

1.4 Limitations and Exceptions

This report has been prepared by Clear Environment for the NGPSG in accordance with the contractual arrangements between Clear Environment and NSW Trade & Investment, and in accordance with the proposal submitted to NSW Trade & Investment on 30 March 2012. The findings of this report are limited to an assessment of the compliance of accredited GreenPower Products with the National GreenPower Accreditation Program: Program Rules Version 7.0 (January 2011), in accordance with the scope of the audit and supporting procedures.

Findings of this assessment are based on information provided to Clear Environment from GreenPower Providers and GreenPower Generators. All information submitted by Providers was audited by an independent auditor prior to submission to Clear Environment. Clear Environment has made no independent verification of this information beyond the agreed scope of the audit and assumes no responsibility for any inaccuracies or omissions.

This report was prepared between 1 August 2012 and 13 March 2013 and is based on information reviewed at the time of preparation. Clear Environment takes no responsibility for any changes made after this date.

This report should be read in full. No responsibility is accepted for use of any part of this report in any other context or for any other purpose other than that specified in the Scope of Audit. The report has been prepared for the use of the National GreenPower Accreditation Steering Group and Clear Environment accepts no responsibility for use by third parties.

1.5 Conflict of Interest

Clear Environment has conducted a number of Tier 1 GreenPower Audits for the 2011 Settlement Period. These audits were declared to the GreenPower Program Manager and it was agreed that they do not present a conflict of interest.

Clear Environment does not have a conflict of interest in conducting this Tier 2 GreenPower Audit.

1.6 Structure of the Report

The report has been structured as follows:

Table 1: Structure of the Report

Section Number	Content
Section 1	Introduction to the report.
Section 2	Overview of the National GreenPower Accreditation Program, including information on the Program Rules, GreenPower Products and GreenPower Providers, and GreenPower accredited Generators.
Section 3	Summary of the audit findings.
Sections 4-44	Summary of data relating to each of the GreenPower Products offered during the 2011 Settlement Period.

Sections 4-44 have been ordered alphabetically by GreenPower Provider name. The information presented is intended to provide an overview of each Product and includes details of each GreenPower Product, customer numbers and LGCs surrendered. Independent auditors verified data from GreenPower Providers. An audit opinion regarding the compliance of each GreenPower Product is stated for each Product. The opinion provided is the opinion provided by the independent auditor in the Audit Statement.

1.7 Key Terms

Some of the key terms used in this report are defined in the table below:

Table 2: Definition of Key Terms

Key Term	Definition
GreenPower Provider	Any person or organisation that operates a GreenPower Product.
GreenPower Generator	An electricity generator approved by the Program Manager that results in Net environmental benefits, and is based primarily on a Renewable Energy resource.
GreenPower Product	Any Product or service that enables customers to voluntarily contribute financially to Renewable Energy generation from GreenPower Generators, and has been accredited under the National GreenPower Accreditation Program.
GreenPower Customer	A domestic or commercial entity for which the GreenPower Provider has established a contract for the provision of a GreenPower Product.
Large-scale Generation Certificates (LGCs)	LGCs are created by electricity generators that have been accredited and registered for the Commonwealth Renewable Energy Target (1 LGC = 1 MWh).

Further definitions are contained in Appendix C of the Program Rules (Appendix 2).

2. National GreenPower Accreditation Program

2.1 Overview

The National GreenPower Accreditation Program is a voluntary market based program that was established by the NSW government in 1997. The objective of the Program is to encourage investment in new renewable energy generation by increasing consumer demand and confidence in accredited GreenPower Products. The aim of the Program is to:

- Facilitate the installation of new Renewable Energy generators across Australia beyond mandatory renewable energy requirements;
- Encourage growth in consumer demand for Renewable Energy;
- Provide consumer choice for, and increase confidence in credible Renewable Energy Products;
- Increase consumer awareness of Renewable Energy and greenhouse issues; and
- Decrease greenhouse gas emissions associated with electricity generation.

For the 2011 Settlement period, a total of 41 GreenPower Products were offered by 31 GreenPower accredited Providers. A total of 2,094,492 MWh GreenPower was sold to GreenPower customers (913,186 MWh to residential customers and 1,181,306 MWh to business customers). The number of customers for the 2011 Settlement Period was 733,566. A total of 2,094,570 LGCs were surrendered

2.2 GreenPower Program Rules

The GreenPower Program has stringent rules that GreenPower Providers and Generators must follow in order to gain and maintain accreditation under the Program.

This audit involved an assessment of GreenPower Products against the criteria in Sections 3 and 4 of the Program Rules. A non-technical summary of the criteria from Sections 3 and 4 of the Program Rules, relevant to the annual compliance audit, are included in the table below. This summary is intended to provide a non-technical background on the criteria. For a more formal interpretation and understanding of the criteria and requirements it is important to refer to the full version of the Program Rules (see Appendix 2).

Table 3: Summary of Criteria in Sections 3 and 4 of Program Rules

Number	Title of Criteria	Description of the Requirement
3.1	Technical Auditing	GreenPower Providers must complete a GreenPower annual technical report at the end of each Settlement Period. The technical report must be audited by an independent and suitably qualified auditor prior to submission.
3.2	Use of GreenPower Generators	All electricity Generators used by GreenPower Products must be approved by the Program Manager; and conform to the definition and eligibility requirements of a GreenPower Generator as set out in Section 5 of the Program Rules.
3.3	Changes to the GreenPower Products and Generators	GreenPower Providers must alert the Program Manager in writing of any changes that are made to the operation of the GreenPower Product (e.g. GreenPower Product structure, changes in fuel sources, etc) prior to those changes taking effect
3.4	Minimum Percentage Requirement of Accredited GreenPower in	GreenPower Providers are required to have a minimum 10% GreenPower content in Products offered to residential customers for all Products. The minimum GreenPower content of residential block-based Products is set at 647kWh/year from 1 January 2007 to 31 December

Number	Title of Criteria	Description of the Requirement
	Blended Products	2011.
3.5	Claims of Eligible Generation for GreenPower Products	GreenPower generation purchases are considered valid if it can be verified that a Large-scale Generation Certificate (LGC) is surrendered for each MWh of GreenPower generation sold through the GreenPower Product. Where only a proportion of the generation from a GreenPower Generator is eligible for use in a GreenPower Product, GreenPower Providers can only claim that eligible portion for a GreenPower Product
3.6	Balancing GreenPower Supply and Demand	<p>GreenPower Providers are required to have made valid claims for GreenPower purchases (as defined in Section 3.5) equivalent to the amount sold to their GreenPower Customers through their GreenPower Product within the Settlement Period. The Program Manager will allow a 3 month reconciliation period to complete transactions and LGC surrenders after the end of the Settlement Period.</p> <p>In cases where there is a shortfall of valid claims of new GreenPower purchases, a number of conditions apply. Where GreenPower Providers have excess purchases pertaining to GreenPower generation which have not been allocated to their GreenPower Product for a defined Settlement Period, GreenPower Providers will be able to carry over a 5 per cent excess of GreenPower LGCs surrendered in the 1-year Settlement Period only to the next Settlement Period for meeting GreenPower generation demand.</p>
3.7	Transfer and Surrender of Large-scale Generation Certificates	<p>GreenPower Providers are required to surrender (or invalidate) 'eligible' LGCs (see eligibility under Section 3.8) as created under the Renewable Energy Target (RET) for each MWh of generation acquired by the GreenPower Provider and sold as part of a GreenPower Product within a Settlement Period.</p> <p>GreenPower Providers are required to set up their own GreenPower Designated Account on the nominated LGC Registry (or registries) – established to administer the RET scheme - into which LGCs for GreenPower compliance will be transferred and then surrendered</p>
3.8	Eligibility of LGCs	<p>Only LGCs created by a GreenPower Generator are eligible for transfer against the requirement arising as a result of the sale of GreenPower generation. There is no requirement to transfer LGCs from the same GreenPower Generators as are used in the GreenPower Product.</p> <p>LGCs created under RET are eligible to be transferred as specified under Section 3.7.</p>
3.9	Shortfall in LGCs	Any sales of GreenPower generation for which a concession cannot be claimed and LGCs are not transferred, cannot be validly claimed as GreenPower. Where a shortfall for meeting supply with demand occurs as a result, the conditions outlined in Section 3.6 will apply.
3.10	GreenPower Provider Purchase of GreenPower Products	All GreenPower Providers are required to purchase GreenPower at a level which entitles them to use the GreenPower Customer Logo. This level is defined in "The GreenPower Logo Usage Guidelines". See Section 4. This requirement applies to each Provider's retail arm as a minimum.
3.11	Treatment of System Losses	GreenPower Providers can choose if they wish to specify to the GreenPower Customer and Program Manager whether transmission and/or distribution system losses attributable to a GreenPower Customer are supplied from GreenPower Generators. If system losses are included, generation supplying these losses must conform to all requirements above.
4.1	Introduction	GreenPower Customers must be provided with clear and concise

Number	Title of Criteria	Description of the Requirement
		information about their electricity Products and services.
4.2	Compliance Review	<p>GreenPower Providers must submit all GreenPower marketing materials to the Program Manager for approval prior to the commencement of marketing. The Program Manager will verify compliance with the GreenPower Marketing Guidelines 2008/2009.</p> <p>Compliance will subsequently be checked annually by the Provider's GreenPower Auditor as part of the annual audit process.</p>
4.3	GreenPower Provider's Intellectual Property	<p>The GreenPower Provider grants to the Program Manager without cost a non-exclusive licence to use any intellectual property relating to the advertising or marketing of the GreenPower Product for purposes covered by these Program Rules and the GreenPower Provider Agreement.</p>
4.4	Provision of Information to Customers	<p>Each GreenPower Provider wishing to use a GreenPower logo, or claim GreenPower accreditation for any of their electricity products agrees to provide all GreenPower Customers, during customer subscription and agreement fulfilment period, with contract pricing and terms and conditions written in clear, simple and easily understood terms.</p>
4.5	Use of GreenPower Logo	<p>Providers must refer to their product's accreditation in all advertising and marketing in connection with the GreenPower Product or the Program as per the GreenPower Provider Agreement. This includes all print, broadcast & online material including a hotlink from the Logo to the GreenPower website.</p> <p>Customers may be entitled to use the GreenPower customer logo if they have purchased or contracted to purchase sufficient levels of GreenPower.</p> <p>Generator owners are entitled to use the GreenPower logo where more than half of the output of the generator is classified as GreenPower generation.</p> <p>The GreenPower logo is available for use where an event will be powered by 100 per cent GreenPower accredited energy.</p>
4.6	GreenPower Product Disclosure Label	<p>The GreenPower Product Disclosure label is designed to provide full disclosure of the contents of GreenPower accredited Products through the inclusion of discrete percentages of all Product contents. The use of the GreenPower Product Disclosure Label is now compulsory for all marketing and collateral of GreenPower accredited Products. The full requirements are contained in the GreenPower Logo Usage Guidelines 2008/2009.</p>
4.7	Treatment of Blends of 'Green' and Other Energy	<p>Prior to entering into an agreement to provide energy to a customer, and in all marketing and advertising related to the composition of a GreenPower Product, the GreenPower Provider must provide clear information about the portions of GreenPower accredited electricity and non-accredited electricity that will be provided (for each level of GreenPower on offer).</p> <p>Only those GreenPower Products that contain 100 per cent GreenPower are able to be described as 100 per cent renewable. No 'blended' Product (i.e. a Product containing less than 100 per cent GreenPower) may be referred to as 100 per cent renewable. Where GreenPower accredited Products are less than 100 per cent, the description of the unaccredited portion (backfill) of the Product is prohibited other than referring to the backfill as other grid electricity.</p> <p>Only 100% GreenPower products can be described as carbon neutral, having zero greenhouse emissions or zero emissions.</p> <p>If a customer is offered a 'block tariff', the GreenPower Provider must clearly communicate how the 'block' is structured (e.g. proportions of</p>

Number	Title of Criteria	Description of the Requirement
		GreenPower approved energy and other components) and what the 'block' translates to in terms of approximate kWh of GreenPower purchased per day/month/quarter, emphasising that calculations are based on average consumer consumption levels rather than actual.
4.8	Misleading Conduct	GreenPower Providers must ensure that they do not undertake, in the opinion of the Program Manager, misleading advertising or conduct in relation to GreenPower. Of particular importance is misleading advertising relating to the composition of GreenPower Products.

2.3 GreenPower Products

GreenPower Products are available to electricity consumers in the residential and business sectors throughout Australia. GreenPower Products can only be offered by GreenPower Providers which have entered into a contractual agreement with the GreenPower Program Manager – Accreditation.

GreenPower Products are accredited under the Program and operate by guaranteeing that a certain amount or proportion of electricity is produced from renewable energy. A GreenPower Provider that sells a GreenPower Product to a consumer commits to ensuring that an equivalent amount of renewable energy is purchased from accredited GreenPower Generators. Under the Program Rules, 'blended' GreenPower Products refer to those Products, which are less than 100 per cent of the consumer's electricity consumption. The GreenPower accredited portion of a blended Product supplied to a residential customer must be equivalent to a minimum of 10 per cent consumption¹ and the term 'GreenPower Product' refers only to this GreenPower accredited portion.

The three main types of GreenPower Products offered in Australia are;

1. Consumption based Products whereby customers nominate the level of GreenPower purchased according to a nominated percentage of their total electricity consumption;
2. 'Block' based Products whereby customers purchase a kWh 'block' of GreenPower that is based on the average household electricity consumption and is not directly linked to an individual customer's consumption; and
3. Purchase of GreenPower to match consumption provided by another Provider. This is available nationally using web interfaces and direct sales to customers. While customers continue to purchase electricity from their standard electricity supplier, the GreenPower Provider will purchase and surrender the equivalent number of LGCs from eligible generation sources to meet the customers elected electricity consumption.

For the 2011 Settlement period, a total of 41 GreenPower Products were offered by 31 GreenPower accredited Providers. The audit covers GreenPower Products that were offered at any time during the 2011 Settlement Period.

In the 2010 Settlement Period there were 39 GreenPower Products offered by 32 GreenPower accredited Providers.

During the 2011 Settlement Period the following changes occurred to Providers and their GreenPower Products:

- Endeavour Energy (previously Integral Energy) divested its retail arm to Origin Energy on 1 March 2011. Each of its GreenPower products (INgreen and BusinessGreen) were audited by URS from 1 January 2011 to 28 February 2011 and then by Beca from 1 March 2011 to 31 December 2011. Clear Environment combined the data from both audits for this Annual Report.
- Essential Energy's 'CountryGreen' GreenPower product moved to Origin Energy on 1 March 2011. CountryGreen was audited by GHD from 1 January 2011 to 28 February 2011 and then by Beca from 1 March 2011 to 31 December 2011. Clear Environment combined the data from both audits for this Annual Report.
- EnergyAustralia's PureEnergy GreenPower products moved to TRUenergy when TRUenergy acquired EnergyAustralia's on 1 March 2011. PureEnergy products were audited by Beca for the entire calendar year within the TRUenergy 2011 GreenPower Audit.
- This report reflects the rebranding of Lumo Energy Providers with changes as follows:

¹ The minimum GreenPower content of residential block-based Products is set at 647kWh/year through to 31 December 2011.

- NSW Electricity became Lumo Energy (NSW);
 - Queensland Electricity became Lumo Energy (QLD);
 - South Australia Electricity became Lumo Energy (SA); and
 - Victoria Electricity became Lumo Energy Australia
- Carbon Planet left the GreenPower Program as an Accredited Provider prior to the 2011 Settlement Period.

Table 4 below provides key details regarding the 41 GreenPower Products offered during the 2011 Settlement Period (1 January to 31 December 2011).

Table 4: GreenPower Products offered during the 2011 Settlement Period

Provider	Product	Jurisdictions	Residential	Business
ActewAGL	GreenChoice	NSW, VIC, QLD, SA, WA, ACT, TAS, NT	✓	✓
ACXargyle (formerly ARK Climate)	GreenPower	NSW, VIC, QLD, SA, WA, ACT, TAS, NT	✓	✓
AGL	GreenPower	NSW, VIC, QLD, SA, ACT, WA	✓	✓
Alinta	GreenPower	WA	✓	✓
Aurora	AuroraGreen	NSW, VIC, TAS, QLD, SA, ACT	✓	✓
Australian Power & Gas	Greentricity	NSW, VIC, QLD	✓	✗
Click Energy	ClickNatural	NSW, VIC, QLD, SA, WA, ACT, TAS, NT,	✓	✗
Climate Friendly	GreenPower	NSW, VIC, QLD, SA, WA, ACT, TAS, NT	✓	✓
COzero	GreenPower	NSW, VIC, QLD, SA, WA, ACT, TAS, NT	✗	✓
Dodo Power & Gas	GreenPower	VIC, NSW, QLD	✓	✗
Ecofund Queensland	Resource	QLD	✗	✓
Energy Pacific	Pacific Hydro	NSW, VIC, QLD, SA, WA, ACT, TAS, NT	✗	✓
Ergon Energy Queensland	Clean Energy	QLD	✓	✓
ERM Power	ERM Green Energy	NSW, VIC, QLD, SA, WA, ACT, TAS, NT	✗	✓
Horizon Power	GreenSelect	WA	✓	✓
Lumo Energy Australia	Lumo Life VIC	VIC	✓	✓
Lumo Energy (NSW)	Lumo Life NSW	NSW	✓	✓

Provider	Product	Jurisdictions	Residential	Business
Lumo Energy (QLD)	Lumo Life QLD	QLD	✓	✓
Lumo Energy (SA)	Lumo Life SA	SA	✓	✓
Momentum	Green Energy	VIC, SA, NSW	✓	✓
Neighbourhood Energy	GreenLight	VIC	✓	✓
Origin Energy	Business Green	NSW	✗	✓
	Country Green	NSW, VIC, QLD, SA, ACT	✓	✓
	EcoPower	VIC	✓	✓
	EcoSaver	VIC	✓	✗
	GreenEarth	NSW, VIC, QLD, SA, WA, ACT, TAS, NT	✓	✓
	Earth's Choice	NSW, QLD, VIC	✓	✓
	INgreen	NSW, QLD	✓	✓
Pangolin Associates	GreenPower for Tenants	NSW, VIC, QLD, SA, WA, ACT, TAS, NT	✗	✓
Perth Energy	PE GreenPower	WA	✗	✓
Power and Water Corporation	Territory Green Power	NT	✓	✓
PowerDirect	GreenDirect	NSW, VIC, QLD, SA	✓	✓
Progressive Green	GreenPower Edge	NSW, VIC, QLD, SA, WA, ACT, TAS, NT	✗	✓
Red Energy	Evergreen	NSW, VIC, ACT	✓	✓
Simply Energy	Simply Green	VIC, SA	✓	✓
	Simply Green 100	VIC, SA	✓	✗
	Green@Work	SA, VIC	✗	✓
Synergy	NaturalPower	WA	✓	✓
	EasyGreen	WA	✓	✗
TRUenergy	TRUenergy Green	NSW, QLD, SA, VIC	✓	✓
	PureEnergy	NSW, QLD, SA, VIC	✓	✓

2.4 GreenPower Generators

The Program Rules define eligibility criteria to which electricity generators must comply in order to be approved under the Program as a GreenPower Generator (Section 5 of the Program Rules).

A GreenPower approved generator is defined as an electricity generator that:

- Results in a greenhouse gas emission reduction within the stationary energy sector;
- Results in net environmental benefit;

- Is based primarily on a renewable energy resource, such that the proportion of eligible renewable energy input exceeds 50 per cent averaged over the settlement period; and
- Meets all other specific eligibility requirements set out in Program Rules.

During the 2011 Settlement Period there were 219 GreenPower accredited Generators in Australia. In the 2010 Settlement Period there were 213 GreenPower accredited Generators in Australia.

Table 5 provides information on the number of LGCs surrendered by GreenPower generator type. It also identifies the number of GreenPower generators used by generator type.

Table 5: Summary of LGC Sources during 2011 Settlement Period

Type of Source	GreenPower Generators used for LGC surrender	Total LGCs Surrendered 2011
Biomass	29	197,512
Hydro	11	23,389
Solar PV	5 ²	10,963
Wind	31	1,862,707
Total	76	2,094,570

Please note that some of the totals do not sum exactly due to rounding. Refer to Appendix 1 for a list of GreenPower Accredited Generators used during 2011 Settlement Period.

Table 6 provides information on the types of GreenPower generator that were used by each GreenPower product during the 2011 Settlement Period.

Table 6: GreenPower Generator Types used by GreenPower Products during 2011 Settlement Period

Provider	Product	Biomass	Hydro	Solar PV	Wind
ActewAGL	GreenChoice				✓
ACXargyle (formerly ARK Climate)	GreenPower	✓		✓	✓
AGL	GreenPower				✓
Alinta	GreenPower				✓
Aurora	AuroraGreen				✓
Australian Power & Gas	Greentricity				✓
Click Energy	ClickNatural	✓			
Climate Friendly	GreenPower	✓			✓
COzero	GreenPower		✓		✓
Dodo Power & Gas	GreenPower				✓
Ecofund Queensland	Resource	✓			✓
Energy Pacific	Pacific Hydro				✓
Ergon Energy Queensland	Clean Energy	✓	✓		✓
ERM Power	ERM Green Energy				✓
Horizon Power	GreenSelect				✓
Lumo Energy Australia	Lumo Life VIC	✓			
Lumo Energy (NSW)	Lumo Life NSW	✓			
Lumo Energy (QLD)	Lumo Life QLD	✓			

² Excludes various small PV generators

Provider	Product	Biomass	Hydro	Solar PV	Wind
Lumo Energy (SA)	Lumo Life SA	✓			
Momentum	Green Energy				✓
Neighbourhood Energy	GreenLight				✓
Origin Energy	Business Green				✓
	Country Green		✓		✓
	EcoPower				✓
	EcoSaver				✓
	GreenEarth	✓	✓		✓
	Earth's Choice	✓			✓
	INgreen	✓			✓
	GreenPower for Tenants				✓
	Perth Energy	PE GreenPower	✓		
Power and Water Corporation	Territory Green Power	✓			
PowerDirect	GreenDirect				✓ ³
Progressive Green	GreenPower Edge		✓		✓
Red Energy	Evergreen		✓		
Simply Energy	Simply Green	✓			✓
	Simply Green 100	✓			
	Green@Work	✓			
Synergy	NaturalPower				✓
	EasyGreen				✓
TRUenergy	TRUenergy Green				✓
	PureEnergy	✓	✓	✓	✓

³ Reported under AGL

3. Summary of Findings

3.1 Introduction

As part of the audit procedures, data relating to sections 3 and 4 of the Program Rules was collected from each Provider in the Annual Audit Report Form. Independent auditors verified this data prior to submission to Clear Environment. In addition, data was collected from selected GreenPower accredited Generators in the form of Generator Reports, which contain the information specified in section 5.6 of the Program Rules. This data was used to confirm the eligibility of relevant LGC surrenders by Providers.

This Section of the report provides a summary of the data and audit findings for the 2011 Settlement Period. The detailed findings of the audit remain commercial-in-confidence. As stated in the methodology, this report is intended to provide relevant details on each Product along with verified statistics.

3.2 Summary Data

The table below shows a summary of customer numbers across each Australian jurisdiction in 2011.

Table 7: Summary of Customer Numbers 2011

	NSW	VIC	QLD	SA	WA	ACT	TAS	NT	Total
Residential	150,043	222,516	217,212	69,270	7,244	18,247	41	28	684,601
Commercial	11,490	17,067	10,760	7,722	1,628	280	12	6	48,965
Total	161,533	239,583	227,972	76,992	8,872	18,527	53	34	733,566

The table below shows a summary of the GreenPower Sales across each Australian jurisdiction in 2011.

Table 8: Summary of GreenPower Sales 2011 (MWh)

	NSW	VIC	QLD	SA	WA	ACT	TAS	NT	Total
Residential	210,943	249,627	308,041	89,972	15,771	38,568	220	44	913,186
Commercial	322,638	345,272	249,283	140,820	44,158	75,778	876	2,481	1,181,306
Total	533,581	594,899	557,324	230,792	59,929	114,346	1,095	2,525	2,094,492

Note that some of the totals do not sum exactly due to rounding.

3.3 Summary of Audit Findings

The audit findings are based on:

- Data received in the Annual Audit Report Forms completed by Providers (verified by independent auditors prior to submission to Clear Environment);
- Generator Reports submitted by selected GreenPower accredited Generators; and
- Clear Environment's analysis.

Table 9 and Table 10 summarise the findings of the compliance audit. This includes the opinions of independent auditors, and Clear Environment's audit opinion. In undertaking the audit GreenPower Products that were found to comply with all rules in Sections 3 and 4 of the Program Rules have received an unqualified opinion from Clear Environment (see Table 9 below).

Table 9: Unqualified Opinions

GreenPower Provider	GreenPower Product	Independent Auditor Opinion	Clear Environment's Audit Opinion
ACXargyle	GreenPower	In our opinion, the GreenPower Annual Audit Report for ACXargyle's GreenPower product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) and the GreenPower Provider Marketing Guidelines 2008/2009.	In Clear Environment's professional opinion, ACXargyle's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
AGL	GreenPower	Beca's unqualified opinion is that AGL's GreenPower Technical Reports for the settlement period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.	In Clear Environment's professional opinion, AGL's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Alinta	GreenPower	In our opinion, the GreenPower Annual Audit Report Form of Alinta's GreenPower products, for the Settlement Period 1 January 2011 to 31 December 2011, is fairly presented and in accordance with applicable requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules (Version 7, January 2011).	In Clear Environment's professional opinion, Alinta's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Aurora	AuroraGreen	In our opinion, in all material respects, the GreenPower Annual Audit Report has been prepared in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program rules, Version 7 (January 2011) for the period 1 January 2011 to 31 December 2011.	In Clear Environment's professional opinion, Aurora's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

GreenPower Provider	GreenPower Product	Independent Auditor Opinion	Clear Environment's Audit Opinion
Australian Power & Gas	Greentricity	In our opinion, the GreenPower Annual Audit Report for Australian Power & Gas' GreenPower product 'Greentricity', relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) and the GreenPower Provider Marketing Guidelines 2008/2009.	In Clear Environment's professional opinion, Australian Power & Gas' GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Click Energy	ClickNatural	In our opinion, the GreenPower Annual Audit Report of Click Energy's 'ClickNatural' for the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with applicable Accounting Standards and the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011)	In Clear Environment's professional opinion, Click Energy's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Ecofund Queensland	Resource	In our opinion, the GreenPower Annual Audit Report of Ecofund for the Settlement Period during 1 January to 31 December 2011 is fairly presented, and in accordance with applicable Accounting Standards and the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules Version 7, January 2011.	In Clear Environment's professional opinion, Ecofund Queensland's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Energy Pacific	Pacific Hydro	In our opinion, the GreenPower Annual Audit Report for Pacific Hydro's GreenPower product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).	In Clear Environment's professional opinion, Energy Pacific's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Ergon Energy Queensland	Clean Energy	In my opinion, the GreenPower Report for Ergon Energy Queensland for the Settlement Period 1 January to 31 December 2011 is fairly presented, in all material respects, in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program	In Clear Environment's professional opinion, Ergon Energy Queensland's GreenPower Product is compliant with Sections 3 and 4 of the National

GreenPower Provider	GreenPower Product	Independent Auditor Opinion	Clear Environment's Audit Opinion
		Rules, Version 7 (January 2011).	GreenPower Accreditation Program Rules, Version 7 (January 2011).
ERM Power	ERM Green Energy	In our opinion, the GreenPower Annual Audit Report for ERM Power's ERM Green Energy product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).	In Clear Environment's professional opinion, ERM Power's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Lumo Energy Australia	Lumo Life VIC	In our opinion, the GreenPower Annual Audit Report for Lumo Energy Australia's GreenPower product 'Lumo Life VIC', relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) and the GreenPower Provider Marketing Guidelines 2008/2009.	In Clear Environment's professional opinion, Lumo Energy Australia's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Lumo Energy (NSW)	Lumo Life NSW	In our opinion, the GreenPower Annual Audit Report for Lumo Energy (NSW)'s GreenPower product 'Lumo Life NSW', relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) and the GreenPower Provider Marketing Guidelines 2008/2009.	In Clear Environment's professional opinion, Lumo Energy (NSW)'s GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Lumo Energy (QLD)	Lumo Life QLD	In our opinion, the GreenPower Annual Audit Report for Lumo Energy (QLD)'s GreenPower product 'Lumo Life Qld', relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) and the GreenPower Provider Marketing Guidelines 2008/2009.	In Clear Environment's professional opinion, Lumo Energy (QLD)'s GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

GreenPower Provider	GreenPower Product	Independent Auditor Opinion	Clear Environment's Audit Opinion
Lumo Energy (SA)	Lumo Life SA	In our opinion, the GreenPower Annual Audit Report for Lumo Energy (SA)'s GreenPower product 'Lumo Life SA', relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) and the GreenPower Provider Marketing Guidelines 2008/2009.	In Clear Environment's professional opinion, Lumo Energy (SA)'s GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Origin Energy	Business Green Country Green Earth's Choice EcoPower EcoSaver GreenEarth INgreen	Beca Pty Ltd's unqualified opinion is that Origin Energy's GreenPower Technical Reports for the settlement period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.	In Clear Environment's professional opinion, Origin's GreenPower Products are compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Pangolin Associates	GreenPower for Tenants	In our opinion, the GreenPower Annual Audit Report for Pangolin Associates' GreenPower for the Tenants GreenPower product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011)	In Clear Environment's professional opinion, Pangolin Associate's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
PowerDirect	Green Direct	Beca's unqualified opinion is that AGL's GreenPower Technical Reports (which includes a product sold under the PowerDirect brand) for the settlement period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.	In Clear Environment's professional opinion, PowerDirect's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

GreenPower Provider	GreenPower Product	Independent Auditor Opinion	Clear Environment's Audit Opinion
Red Energy	Evergreen	In our opinion, the GreenPower Annual Audit Report for Red Energy's Evergreen product, relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) and the GreenPower Provider Marketing Guidelines 2008/2009.	In Clear Environment's professional opinion, Red Energy's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Simply Energy	Simply Green Simply Green 100 Green@Work	In our opinion, the Reported Data in the GreenPower Annual Audit Report of Simply Energy's products (Green@Work, Simply Green 100 and Simply Green) for the Settlement Period 1 January 2011 to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules version 7, issued January 2011.	In Clear Environment's professional opinion, Simply Energy's GreenPower Products are compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
TRUenergy	TRUenergy Green PureEnergy	Beca's unqualified opinion is that TRUenergy's GreenPower Technical Reports for the settlement period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.	In Clear Environment's professional opinion, TRUenergy's GreenPower Products are compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

Any cases whereby non-compliance with Sections 3 or 4 of the Program Rules was identified, the GreenPower Product received a qualified opinion from Clear Environment (see Table 10 below). The basis of the qualified opinion and the corresponding rule is stated in the Qualification Statement.

Table 10: Qualified Opinions

GreenPower Provider	GreenPower Product	Independent Auditor Opinion	Qualification Statement	Clear Environment's Audit Opinion
ActewAGL	GreenChoice	In our opinion, the GreenPower Annual Audit Report for ActewAGL's GreenChoice GreenPower product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).	ActewAGL did not complete the initial surrender of all LGCs by 31 March 2012 (Criteria 3.7).	In Clear Environment's opinion, except for the matter referred to in the Qualification Statement, ActewAGL's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Climate Friendly	GreenPower	In our opinion, the GreenPower Annual Audit Report for Climate Friendly's GreenPower product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) with minor exceptions relating to compliance with the GreenPower Provider Marketing Guidelines 2008/2009.	Climate Friendly stated that it has requested Program Manager approval of their marketing material but has not yet received the approval (Criteria 4.2). Climate Friendly has other non-approved products displayed on the same webpage as their GreenPower product (Criteria 4.6).	In Clear Environment's opinion, except for the matters referred to in the Qualification Statement, Climate Friendly's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
COzero	GreenPower	In our opinion, the GreenPower Annual Audit	COzero does not hold approval from	In Clear Environment's opinion, except for

GreenPower Provider	GreenPower Product	Independent Auditor Opinion	Qualification Statement	Clear Environment's Audit Opinion
		<p>Report for COzero's GreenPower product, relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) with the exception of 'Section 4.2 Compliance Review', relating to approval of GreenPower marketing materials by the GreenPower Program Manager, and 'Section 4.5 Use of GreenPower Logo' relating to the use of the GreenPower logo by COzero .</p>	<p>the GreenPower Program Manager for part of their GreenPower marketing materials (Criteria 4.2).</p> <p>COzero has not used the GreenPower logo in connection with its GreenPower product (Criteria 4.6).</p> <p>COzero did not complete the initial surrender of all LGCs by 31 March 2012 (Criteria 3.7).</p>	<p>the matters referred to in the Qualification Statement, COzero's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).</p>
Dodo Power & Gas	GreenPower	<p>In our opinion, the GreenPower Annual Audit Report for Dodo Power and Gas Pty Ltd 'Dodo GreenPower' product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).</p>	<p>Dodo Power & Gas did not complete the initial surrender of all LGCs by 31 March 2012 (Criteria 3.7).</p>	<p>In Clear Environment's opinion, except for the matter referred to in the Qualification Statement, Dodo Power & Gas' GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).</p>
Horizon Power	GreenSelect	<p>In our opinion, with the exception of Appendix 5 "Marketing", Appendices 1 to 4 of the GreenPower Annual Audit Report of Horizon Power for the Settlement Period 1 January 2011 to 31 December 2011 are in accordance with the requirements of the National</p>	<p>Horizon Power does not hold approval from the GreenPower Program Manager for part of their GreenPower marketing materials (Criteria 4.2).</p>	<p>In Clear Environment's opinion, except for the matter referred to in the Qualification Statement, Horizon's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation</p>

GreenPower Provider	GreenPower Product	Independent Auditor Opinion	Qualification Statement	Clear Environment's Audit Opinion
		GreenPower Accreditation Program as defined in section "6.2 Annual Audit Report", of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).	Horizon Power did not complete the initial surrender of all LGCs by 31 March 2012 (Criteria 3.7).	Program Rules, Version 7 (January 2011).
Momentum	Green Energy	In our opinion, the GreenPower Annual Audit Report for Momentum's GreenPower product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) with minor exceptions relating to compliance with the GreenPower Provider Marketing Guidelines 2008/2009.	Momentum does not have approval from the GreenPower Program Manager for the GreenPower section of their website and the 'GreenPower sticker' (Criteria 4.2).	In Clear Environment's opinion, except for the matter referred to in the Qualification Statement, Momentum's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Neighbourhood Energy	GreenLight	In our opinion, the GreenPower Annual Audit Report for Neighbourhood Energy's GreenPower product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) with exceptions relating to compliance with the GreenPower Provider Marketing Guidelines 2008/2009	Neighbourhood Energy does have approval from the GreenPower Program Manager for the GreenPower section of the Neighbourhood Energy website (Criteria 4.2).	In Clear Environment's opinion, except for the matters referred to in the Qualification Statement, Neighbourhood Energy's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
			Neighbourhood Energy does not appear to use the GreenPower logo in connection with its GreenPower product (Criteria 4.6).	

GreenPower Provider	GreenPower Product	Independent Auditor Opinion	Qualification Statement	Clear Environment's Audit Opinion
Perth Energy	PE GreenPower	In our opinion, except for the matters referred to in the Basis for qualified opinion paragraph, in all material respects, the GreenPower Provider Annual Report for the 2011 Settlement Period has been prepared in accordance with the requirements of the National Green Power Accreditation Program for the year ended 31 December 2011.	Perth Energy holds no record of approval by the Program Manager for marketing materials used on its website (Criteria 4.2). Perth Energy promotes non-accredited renewable electricity products on the same webpage as the GreenPower logo (Criteria 4.6).	In Clear Environment's opinion, except for the matters referred to in the Qualification Statement, Perth Energy's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Power and Water Corporation	Territory GreenPower	In our opinion, the data contained in Section 1: Product Information, Section 2: GreenPower purchases, Section 3: GreenPower Sales, Section 4: Surrender of LGCs and Section 5: Marketing, of Power and Water Corporation's Technical Report covering the Settlement Period 1 January 2011 to 31 December 2011 is presented, in all material respects, in accordance with the requirements of the National GreenPower Accreditation Program, Version 7 (January 2011).	Power and Water Corporation did not complete the initial surrender of all LGCs by 31 March 2012 (Criteria 3.7).	In Clear Environment's opinion, except for the matter referred to in the Qualification Statement, Power and Water Corporation's GreenPower Products are compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).
Progressive Green	GreenPower Edge	In our opinion, the GreenPower Annual Audit Report for Progressive Green's GreenPower product 'GreenPower Edge', relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program	Progressive Green was unable to provide a record of approval of their GreenPower marketing materials (Criteria 4.2).	In Clear Environment's opinion, except for the matter referred to in the Qualification Statement, Progressive Green's GreenPower Product is compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules,

GreenPower Provider	GreenPower Product	Independent Auditor Opinion	Qualification Statement	Clear Environment's Audit Opinion
		as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) with the exception of 'Section 4.2 Compliance Review', relating to approval of GreenPower marketing materials by the GreenPower Program Manager.		Version 7 (January 2011).
Synergy	NaturalPower EasyGreen	In our opinion, the GreenPower Annual Audit Report of Synergy's NaturalPower (and Easy Green) for the Settlement period 1 January to 31 December 2011 is fairly presented, and in accordance with applicable Accounting Standards and the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).	Synergy did not complete the initial surrender of all LGCs by 31 March 2012 (Criteria 3.7).	In Clear Environment's opinion, except for the matter referred to in the Qualification Statement, Synergy's GreenPower Products are compliant with Sections 3 and 4 of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

The detailed findings that support the qualification statements are commercial-in-confidence and are therefore not reported separately under the report on each GreenPower Product in the following Sections.

4. ActewAGL – GreenChoice

Energetics Pty Ltd's independent audit states that the GreenPower Annual Audit Report for ActewAGL's GreenChoice GreenPower product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block Based
GREEN 5	Residential / Business	13,204	All		Block of 5 kWh / day
GREEN 10	Residential / Business	1,872	All		Block of 10 kWh / day
GREEN 15	Residential / Business	286	All		Block of 15 kWh / day
GREEN 20	Residential / Business	95	All		Block of 20 kWh / day
GCON 10%	Residential / Business	1,771	All	10%	Consumption
GCON 25%	Residential / Business	1,587	All	25%	Consumption
GCON 50%	Residential / Business	166	All	50%	Consumption
GCON 100%	Residential / Business	672	All	100%	Consumption
GCON 200%	Residential / Business	39	All	200%	Consumption
Total Number of Customers		19,692⁴			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	40,588	50,844	91,433

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
91,433	✓	✓

⁴ This number exceeds the total customer count reported in Section 3.2 because some GreenChoice customers subscribe to more than one GreenChoice product. The total number of unique customers is 19,672.

5. ACXargyle – GreenPower

Clear Environment Pty Ltd's independent audit states that the GreenPower Annual Audit Report for ACXargyle's GreenPower product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) and the GreenPower Marketing Guidelines 2008/2009.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
ACXargyle GreenPower	Residential / Business	26	All	100%	Block
Total Number of Customers		26			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	32	71,985	72,017

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
72,017	✓	✓

6. AGL – GreenPower

Beca Pty Ltd's independent audit states that AGL's GreenPower Technical Reports for the Settlement Period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block Based
Green Energy	Residential / Business	18,250	NSW, VIC, QLD, SA, ACT	Varies	Consumption
Green Living	Residential	2,892	NSW, VIC, QLD, SA	20%	Consumption
Green Spirit	Residential	17,670	NSW, VIC, QLD, SA	10%	Consumption
Green for Free	Residential / Business	9,487	NSW, VIC, QLD, SA, ACT	10%	Consumption
Green Events	Business	3	NSW, VIC, QLD, SA, WA	100%	Block
Total Number of Customers		48,302			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	32,120	228,075	260,195

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
287,360 ⁵	✓	✓

⁵ As PowerDirect is a fully owned subsidiary of AGL, a separate PowerDirect GreenPower designated account has not been established. Total LGCs surrendered for the AGL GreenPower designated account contain sufficient LGC surrenders for PowerDirect

7. Alinta – GreenPower

URS Australia Pty Ltd's independent audit states that the GreenPower Annual Audit Report of Alinta's GreenPower products for the Settlement Period of 1 January 2011 to 31 December 2011 is fairly presented, and in accordance with applicable requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7, January 2011.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
GreenPower 10%	-	-	WA	10%	Consumption
GreenPower 25%	Business	1	WA	25%	Consumption
GreenPower 50%	Business	1	WA	50%	Consumption
GreenPower 100%	Business	3	WA	100%	Consumption
Total Number of Customers		5			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	-	523	523

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
522	✓ ⁶	✓

⁶ One-LGC shortfall carried forward to 2012

8. Aurora – AuroraGreen

KPMG's independent audit states that in all material respects, the GreenPower Annual Audit Report has been prepared in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) for the period 1 January 2011 to 31 December 2011.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
AuroraGreen	Residential / Business	57	NSW, VIC, QLD, SA, ACT, TAS	10%, 20%, 50%, 75%, 100%	Consumption
Total Number of Customers		57			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	220	17,514	17,734

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
17,734	✓	✓

Clear Environment notes that an LGC shortfall was incorrectly reported for the 2010 Settlement Period in the previous Annual Audit Report. Additional LGC surrenders were therefore not required during the 2011 Settlement Period.

9. Australian Power and Gas – Greentricity

Clear Environment Pty Ltd's independent audit states that the GreenPower Annual Audit Report for Australian Power and Gas' Greentricity product, relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) with minor exceptions relating to compliance with the GreenPower Marketing Guidelines 2008/2009.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Greentricity 10%	Residential	925	NSW, VIC, QLD	10%	Consumption
Greentricity 50%	Residential	296	NSW, VIC, QLD	50%	Consumption
Greentricity 100%	Residential	1,051	NSW, VIC, QLD	100%	Consumption
Total Number of Customers		2,272			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	6,498	-	6,498

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
6,500	✓	✓

10. Click Energy – ClickNatural

MORAN Chartered Accountants' independent audit states that the GreenPower Annual Audit Report of Click Energy's ClickNatural for the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with applicable Accounting Standards and the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
ClickNatural	Residential	220	All	25%	Consumption
Total Number of Customers		220			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	204	-	204

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
215	✓	✓

11. Climate Friendly – GreenPower

Treo Environment Pty Ltd's independent audit states that the GreenPower Annual Audit Report for Climate Friendly's GreenPower product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011), with minor exceptions relating to compliance with the GreenPower Marketing Guidelines 2008/2009.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
GreenPower	Residential/ Business	46	All	100%	Block
Total Number of Customers		46			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	115	6,597	6,711

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
6,714	✓	✓

12. COzero – GreenPower

Clear Environment Pty Ltd's independent audit states that the GreenPower Annual Audit Report for COzero's GreenPower product, relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) with the exception of 'Section 4.2 Compliance Review', relating to approval of GreenPower marketing materials by the GreenPower Program Manager, and 'Section 4.5 Use of GreenPower Logo' relating to the use of the GreenPower logo by COzero.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
GreenPower	Business	57	All	Varies	Block
Total Number of Customers		57			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	-	86,855	86,855

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
84,907 ⁷	✓	✓

⁷ Includes 2,365 LGCs to make up for the 2010 shortfall. A shortfall of 4,323 LGCs is carried forward from 2011 to 2012. The 2011 shortfall must be addressed in 2012.

13. Dodo Power & Gas – GreenPower

RSM Bird Cameron Chartered Accountants' independent audit states that the GreenPower Annual Audit Report for Dodo Power and Gas Pty Ltd 'Dodo GreenPower' product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with applicable Accounting Standards and the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Dodo 100% GreenPower	Residential	44	Vic, NSW, QLD	100%	Consumption
Dodo 10% GreenPower	Residential	54	Vic, NSW, QLD	10%	Consumption
Total Number of Customers		98			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	19	-	19

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
25	✓	✓

14. Ecofund Queensland – Resource

DNV Certification Pty Ltd's independent audit states that the GreenPower Annual Audit Report of Ecofund for the Settlement Period during 1 January to 31 December 2011 is fairly presented, and in accordance with applicable Accounting Standards and the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7, January 2011.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Resource	Business	4	QLD	Varies	Consumption
Total Number of Customers		4			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	0	23,643	23,643

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
23,643	✓	✓

15. Energy Pacific – Pacific Hydro

Treo Environment Pty Ltd's independent audit states that the GreenPower Annual Audit Report for Energy Pacific's 'Pacific Hydro' product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Pacific Hydro	Business	2	All	100%	Consumption
Total Number of Customers		2			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	-	3,239	3,239

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
3,524	✓	✓

16. Ergon Energy Queensland – Clean Energy

N. George's CPA (as delegate of the Auditor-General of Queensland) independent audit states that the GreenPower Report for Ergon Energy Queensland for the Settlement Period 1 January to 31 December 2011 is fairly presented, in all material respects, in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Clean Energy	Residential	61,041	QLD	10%, 25% 50%, 75%, 100%	Blocks of 800 - 8,000 kWh / yr
Clean Energy	Business	3,017	QLD	2.5% to 100%	Consumption
Total Number of Customers		64,058			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	51,270	7,960	59,230

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
59,263	✓	✓

17. ERM Power – ERM Green Energy

Environ Australia Pty Ltd's independent audit states that the GreenPower Annual Audit Report for ERM Power's 'ERM Green Energy' product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
ERM Green Energy	Business	4	All	Any	Consumption
Total Number of Customers		4			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	-	34,533	34,533

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
34,533	✓	✓

18. Horizon Power – GreenSelect

BDO Audit (WA) Pty Ltd's independent audit states that, with the exception of Appendix 5 "Marketing", Appendices 1 to 4 of the GreenPower Annual Audit Report of Horizon Power for the Settlement Period 1 January 2011 to 31 December 2011 are in accordance with the requirements of the National GreenPower Accreditation Program, as defined in section "6.2 Annual Audit Report", of the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
GreenSelect 50%	Residential / Business	5	WA	50%	Consumption
GreenSelect 100%	Residential / Business	10	WA	100%	Consumption
Total Number of Customers		15			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	111	5	117 ⁸

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
212	✓	✓

⁸ Please note that some of the totals do not sum exactly due to rounding.

19. Lumo Energy Australia – Lumo Life VIC

Clear Environment Pty Ltd's independent audit states that the GreenPower Annual Audit Report for Lumo Energy Australia's GreenPower Product 'Lumo Life VIC', relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) and the GreenPower Marketing Guidelines 2008/2009.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Lumo Life	Residential / Business	5,568	VIC	10%	Consumption
Lumo Life	Residential / Business	611	VIC	100%	Consumption
Total Number of Customers		6,179			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	3,890	3,819	7,709

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
7,709	✓	✓

20. Lumo Energy (NSW) – Lumo Life NSW

Clear Environment Pty Ltd's independent audit states that the GreenPower Annual Audit Report for Lumo Energy (NSW)'s GreenPower Product 'Lumo Life NSW', relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) and the GreenPower Marketing Guidelines 2008/2009.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Lumo Life	Residential / Business	138	NSW	10%	Consumption
Lumo Life	Residential / Business	60	NSW	100%	Consumption
Total Number of Customers		198			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	141	264	405

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
405	✓	✓

21. Lumo Energy (QLD) – Lumo Life QLD

Clear Environment Pty Ltd's independent audit states that the GreenPower Annual Audit Report for Lumo Energy (QLD)'s GreenPower Product 'Lumo Life QLD', relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) and the GreenPower Marketing Guidelines 2008/2009.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Lumo Life	Residential / Business	370	QLD	10%	Consumption
Lumo Life	Residential / Business	53	QLD	100%	Consumption
Total Number of Customers		423			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	269	13	282

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
282	✓	✓

22. Lumo Energy (SA) – Lumo Life SA

Clear Environment Pty Ltd's independent audit states that the GreenPower Annual Audit Report for Lumo Energy (SA)'s GreenPower Product 'Lumo Life SA', relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011) and the GreenPower Marketing Guidelines 2008/2009.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Lumo Life	Residential/ Business	285	SA	10%	Consumption
Lumo Life	Residential / Business	59	SA	100%	Consumption
Total Number of Customers		344			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	251	49	300

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
300	✓	✓

23. Momentum – Green Energy

Clear Environment Pty Ltd's independent audit states that the GreenPower Annual Audit Report for Momentum Energy's GreenPower product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011), with minor exceptions relating to compliance with the GreenPower Marketing Guidelines 2008/2009.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Green Energy	Business	24	NSW, VIC, SA	6%	Consumption
Green Energy	Business	136	NSW, VIC, SA	10%	Consumption
Green Energy	Business	5	NSW, VIC, SA	15%	Consumption
Green Energy	Business	108	NSW, VIC, SA	20%	Consumption
Green Energy	Business	28	NSW, VIC, SA	25%	Consumption
Green Energy	Business	8	NSW, VIC, SA	30%	Consumption
Green Energy	Business	12	NSW, VIC, SA	40%	Consumption
Green Energy	Business	30	NSW, VIC, SA	50%	Consumption
Green Energy	Business	3	NSW, VIC, SA	75%	Consumption
Green Energy	Business	44	NSW, VIC, SA	100%	Consumption
Green Energy	Residential	127	VIC, SA	10%	Block of 6,470 kWh / year
Green Energy	Residential	4	VIC, SA	25%	Block of 6,470 kWh / year
Green Energy	Residential	4	VIC, SA	50%	Block of 6,470 kWh / year
Green Energy	Residential	15	VIC, SA	100%	Block of 6,470 kWh / year
Total Number of Customers		548			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	118	33,839	33,957

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
33,967	✓	✓

24. Neighbourhood Energy – GreenLight

Clear Environment Pty Ltd's independent audit states that the GreenPower Annual Audit Report for Neighbourhood Energy's GreenPower product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011), with exceptions relating to compliance with the GreenPower Marketing Guidelines 2008/2009.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
GreenLight	Residential/ Business	167	VIC	100%	Consumption
GreenLight	Residential	8	VIC	50%	Consumption
GreenLight	Residential	22	VIC	25%	Consumption
Total Number of Customers		197			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	749	94	843

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
931	✓	✓

25. Origin Energy – Business Green

Beca Pty Ltd's independent audit states that Origin Energy's GreenPower Technical Reports for the Settlement Period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Business Green 100%	Business	3	NSW	100%	Consumption
Business Green 20%	Business	1	NSW	20%	Consumption
Business Green 2%	Business	1	NSW	2%	Consumption
Total Number of Customers		5			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	-	1,184	1,184

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
1,184	✓	✓

Endeavour Energy (previously Integral Energy) divested its retail arm (INgreen and Business Green products) to Origin Energy on 1 March 2011. Integral Energy was responsible for the data from 1 January 2011 to 28 February 2011. Origin Energy was responsible for the data from 1 March 2011 to 31 December 2011. Clear Environment combined the data from the two separate audits for this Annual Report.

26. Origin Energy – CountryGreen

Beca Pty Ltd's independent audit states that Origin Energy's GreenPower Technical Reports for the Settlement Period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
CountryGreen®10%	Residential	21,912	NSW, VIC, QLD, SA, ACT	10%	Block of 647 kWh/yr
CountryGreen®20%	Residential	2,436	NSW, VIC, QLD, SA, ACT	20%	Block of 1,294 kWh/yr
CountryGreen®50%	Residential	1,153	NSW, VIC, QLD, SA, ACT	50%	Block of 3,235 kWh/yr
CountryGreen®100%	Residential	1,269	NSW, VIC, QLD, SA, ACT	100%	Block of 6,470 kWh/yr
CountryGreenBusiness®10%	Business	895	NSW, VIC, QLD, SA, ACT	10%	Consumption
CountryGreenBusiness®100%	Business	293	NSW, VIC, QLD, SA, ACT	2.5 - 100%	Consumption
Total Number of Customers		27,958			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	38,159	7,447	45,606

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
45,606	✓	✓

Essential Energy's 'CountryGreen' GreenPower product moved to Origin Energy on 1 March 2011. Essential Energy was responsible for the data from 1 January 2011 to 28 February 2011. Origin Energy was responsible for the data from 1 March 2011 to 31 December 2011. Clear Environment combined the data from both audits for this Annual Report.

27. Origin Energy – EcoPower

Beca Pty Ltd's independent audit states that Origin Energy's GreenPower Technical Reports for the Settlement Period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
EcoPower Resi	Residential	5	VIC	100%	Consumption
EcoPower SME	Business	1	VIC	100%	Consumption
Total Number of Customers		6			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	42	9	51

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
51	✓	✓

28. Origin Energy – EcoSaver

Beca Pty Ltd's independent audit states that Origin Energy's GreenPower Technical Reports for the Settlement Period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
EcoSaver Resi	Residential	60	VIC	100%	Consumption
Total Number of Customers		60			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	34	0	34

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
34	✓	✓

29. Origin Energy – Green Earth

Beca Pty Ltd's independent audit states that Origin Energy's GreenPower Technical Reports for the Settlement Period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
GreenEarth	Residential	64,592	NSW, VIC, QLD, SA	20%	Consumption
GreenEarth 10%_NGPR_NEW	Residential	1,311	NSW, VIC, QLD, SA	10%	Consumption
GreenEarth 25%	Residential	259,865	NSW, VIC, QLD, SA	25%	Consumption
GreenEarth 25%_NGPR_NEW	Residential	19,138	NSW, VIC, QLD, SA	25%	Consumption
GreenEarth Extra	Residential	2,296	NSW, VIC, QLD, SA	50%	Consumption
GreenEarth Extra_NGPR_NEW	Residential	183	NSW, VIC, QLD, SA	50%	Consumption
GreenEarth Go Green Calculator	Residential	3	NSW, VIC, QLD, SA, WA, ACT, TAS, NT	100%	Consumption
GreenEarth NSW 10%	Residential	95	NSW, VIC, QLD, SA	10%	Consumption
GreenEarth Solar	Residential	6	NSW, VIC, QLD, SA	100%	Consumption
GreenEarth Solar_NGPR_NEW	Residential	-	NSW, VIC, QLD, SA	100%	Consumption
GreenEarth Wind	Residential	7,552	NSW, VIC, QLD, SA	100%	Consumption
GreenEarth Wind_NGPR_NEW	Residential	819	NSW, VIC, QLD, SA	100%	Consumption
GreenEarth_NGPR_NEW	Residential	806	NSW, VIC, QLD, SA	20%	Consumption
Green Events-NEW	Business	1	NSW, VIC, QLD, SA, WA, ACT, NT	100%	Consumption
GreenEarth 25%_NGPR_NEW	Business	632	NSW, VIC, QLD, SA	25%	Consumption
GreenEarth C&I (100)	Business	1	NSW, VIC, QLD, SA, WA, ACT, NT	100%	Consumption
GreenEarth C&I (80/20)	Business	-	VIC	100%	Consumption
GreenEarth C&I (100)_NEW	Business	30	NSW, VIC, QLD, SA, WA, ACT, NT	100%	Consumption
GreenEarth Extra_NGPR_NEW	Business	11	NSW, VIC, QLD, SA	50%	Consumption
GreenEarth NSW 10%	Business	53	QLD, VIC	10%	Consumption
GreenEarth SME 10%	Business	22	NSW, VIC, QLD, SA	10%	Consumption
GreenEarth SME			NSW, VIC, QLD,		

20%	Business	12,440	SA	20%	Consumption
GreenEarth SME 25%	Business	4,818	NSW, VIC, QLD, SA	25%	Consumption
GreenEarth SME Extra	Business	89	NSW, VIC, QLD, SA	50%	Consumption
GreenEarth SME SOLAR	Business	-	SA, VIC	100%	Consumption
GreenEarth SME WIND	Business	342	NSW, VIC, QLD, SA	100%	Consumption
GreenEarth Wind_NGPR_NEW	Business	68	NSW, VIC, QLD, SA	100%	Consumption
GreenEarth_NGPR_ NEW	Business	1,015	NSW, VIC, QLD, SA	20%	Consumption
Origin Energy (Internal)	Business	7	NSW, VIC, QLD, SA, WA, TAS, NT	10%	Consumption
Total Number of Customers		376,195			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	571,722	173,965	745,687

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
747,041	✓	✓

30. Origin Energy – Earth’s Choice

Beca Pty Ltd’s independent audit states that Origin Energy’s GreenPower Technical Reports for the Settlement Period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Earth’schoice 330 kWh	Residential	37	VIC, QLD	100%	Block Based
Earth’schoice 665 kWh	Residential	7	QLD	100%	Block Based
Earth’schoice 1,000 kWh	Residential	4	QLD	100%	Block Based
Earth’schoice 1,330 kWh	Residential	4	VIC, QLD,	100%	Block Based
Earth’schoice 1,665 kWh	Residential	1	QLD	100%	Block Based
Earth’schoice 1,990 kWh	Residential	1	QLD	100%	Block Based
Earth’schoice 2,310 kWh	Residential	1	QLD	100%	Block Based
Earth’schoice 2,640 kWh	Residential	0	QLD	100%	Block Based
Earth’schoice 2,970 kWh	Residential	0	QLD	100%	Block Based
Earth’schoice 3,300 kWh	Residential	0	QLD	100%	Block Based
Earth’schoice 3,960 kWh	Residential	0	QLD	100%	Block Based
Earth’schoice 4,800 kWh	Residential	0	QLD	100%	Block Based
Earth’schoice C&I	Business	12	NSW,QLD,VIC	100%	Consumption
Total Number of Customers		67			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	526	251	777

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
777	✓	✓

31. Origin Energy – INgreen

Beca Pty Ltd's independent audit states that Origin Energy's GreenPower Technical Reports for the Settlement Period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
INgreen Business 2.5%	Business	31	NSW, QLD	2.5%	Consumption
INgreen Business 10%	Business	41	NSW	10%	Consumption
INgreen Business 75%	Business	3	NSW, QLD	75%	Consumption
INgreen Business 100%	Business	22	NSW, QLD	100%	Consumption
INgreen Future 100%	Residential	181	NSW	100%	Consumption
INgreen Home 10%	Residential	79	NSW	10%	Consumption
INgreen Living 10%	Residential	15,186	NSW	10%	Consumption
INgreen Living 20%	Residential	27	NSW	20%	Consumption
INgreen Living 50%	Residential	30	NSW	50%	Consumption
INgreen Power 10%	Residential	165	NSW	10%	Consumption
INgreen Power 20%	Residential	1	NSW	20%	Consumption
INgreen Power 50%	Residential	6	NSW	50%	Consumption
INgreen Pure 100%	Residential	185	NSW	100%	Consumption
INgreen Living 10%	Residential	1,148	QLD	10%	Consumption
INgreen Pure 100%	Residential	9	QLD	100%	Consumption
Total Number of Customers		17,114			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	18,788	378	19,166

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
19,166	✓	✓

Endeavour Energy (previously Integral Energy) divested its retail arm (INgreen and Business Green products) to Origin Energy on 1 March 2011. Integral Energy was responsible for the data from 1 January 2011 to 28 February 2011. Origin Energy was responsible for the data from 1 March 2011 to 31 December 2011. Clear Environment combined the data from the two separate audits for this Annual Report.

32. Pangolin – GreenPower for Tenants

MGI Assurance (SA) Chartered Accountants independent audit states that the GreenPower Annual Audit Report for Pangolin Associates' 'GreenPower for Tenants' GreenPower product relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
GreenPower for Tenants	Business	7	All	100%	Consumption
Total Number of Customers		7			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	-	5,911	5,911

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
5,911	✓	✓

33. Perth Energy – PE GreenPower

KMPG's independent audit states that, except for the matters referred to in the Basis for qualified opinion paragraph, in all material respects, the GreenPower Provider Annual Report for the 2011 Settlement Period has been prepared in accordance with the requirements of the National Green Power Accreditation Program for the year ended 31 December 2011.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
PE Green Power	Business	4	WA	10 -100%	Consumption
Total Number of Customers		4			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	-	7,938	7,938

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
7,938	✓	✓

34. Power and Water Corporation – Territory Green Power

Ernst & Young's independent audit states that the data contained in Section 1: Product Information, Section 2: GreenPower Purchases, Section 3: GreenPower Sales, Section 4: Surrender of LGCs and Section 5: Marketing of Power and Water Corporation's Technical Report covering the Settlement Period 1 January 2011 to 31 December 2011 is presented, in all material respects, in accordance with the requirements of the National GreenPower Accreditation Program, Version 7 (January 2011).

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Territory GreenPower Level – 10%	Residential	7	NT	10%	Block of 647 kWh / year
Territory GreenPower Level – 50%	Residential	13	NT	50%	Block of 3,235 kWh / year
Territory GreenPower Level – 100%	Residential	7	NT	100%	Block of 6,470 kWh / year
Territory GreenPower Level - Commercial	Business	5	NT	1-100%	Consumption
Total Number of Customers		32			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	44	2,469	2,513

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
2,540	✓	✓

35. PowerDirect – Green Direct

Beca Pty Ltd's independent audit states that AGL's GreenPower Technical Reports (which includes a product sold under the PowerDirect brand) for the settlement period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Green Direct	Residential/ Business	5,819	NSW,VIC, QLD,SA	10%,20%,25% 50%, 75%,100%	Consumption
Total Number of Customers		5,819			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	1,345	25,820	27,165

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
0	✓	✓

As PowerDirect is a fully owned subsidiary of AGL, a separate PowerDirect GreenPower designated account has not been established. Instead, sufficient LGCs have been surrendered into the AGL GreenPower designated account on behalf of PowerDirect.

36. Progressive Green – Green Power Edge

Clear Environment Pty Ltd's independent audit states that the GreenPower Annual Audit Report for Progressive Green's GreenPower product GreenPower Edge, relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011), with the exception of 'Section 4.2 Compliance Review', relating to approval of GreenPower marketing materials by the GreenPower Program Manager.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
GreenPower Active	Business	1	All	10%	Consumption
GreenPower Edge	Business	1	All	100%	Consumption
Total Number of Customers		2			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	-	1,253	1,253

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
1,253	✓	✓

37. Red Energy – Evergreen

Clear Environment Pty Ltd's independent audit states that the GreenPower Annual Audit Report for Red Energy's 'Evergreen' GreenPower product, relating to the Settlement Period 1 January to 31 December 2011 is fairly presented, and in general accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011), and the GreenPower Marketing Guidelines 2008/2009.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Evergreen 100% GreenPower	Residential	821	NSW, VIC, ACT	100%	Consumption
Evergreen 100% GreenPower	Business	1	NSW, VIC, ACT		Block of 694 MWh / year
10% GreenPower	Business	2	VIC	10%	Consumption
Total Number of Customers		824			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	4,376	790	5,166

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
5,258	✓	✓

38. Simply Energy – Simply Green 100

PricewaterhouseCoopers's independent audit states that the Reported Data in the GreenPower Annual Audit Report of Simply Energy's 'Simply Green 100' product for the Settlement Period 1 January 2011 to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules version 7, issued January 2011.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
SA Simply Green 100, Simply Green 100	Residential	175	VIC, SA	100%	Consumption
Total Number of Customers		175			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	733	-	733

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
733	✓	✓

39. Simply Energy – Simply Green

PricewaterhouseCoopers's independent audit states that the Reported Data in the GreenPower Annual Audit Report of Simply Energy's Simply Greener product for the Settlement Period 1 January 2011 to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules version 7, issued January 2011.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
SA Simply Green10, Green 10, Green Mates, Green Mates V2, SA Loyalty Freedom Green 10, SA RAA Partnership Green 10, SA Simply Green 10, Simply Green 10 V2, Simply Greener, Simply Greener V2	Residential	24,559	VIC, SA	10%	Consumption
Previously sold 12.5% product	Residential/ Business	24,833	VIC, SA	12.5%	Consumption
Business Saver Green, SA Simply Green 10@Work	Business	81	VIC, SA	10%	Consumption
Total Number of Customers		49,473			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	27,412	298	27,709

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
27,731 ⁹	✓	✓

⁹ A shortfall of 11 LGCs from the 2010 Settlement Period has been included in this amount.

40. Simply Energy – Green@Work

PricewaterhouseCoopers's independent audit states that the Reported Data in the GreenPower Annual Audit Report of Simply Energy's Green@Work product for the Settlement Period 1 January 2011 to 31 December 2011 is fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules version 7, issued January 2011.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
C and I 10	Business	18	VIC, SA	10%	Consumption
C and I 25	Business	7	VIC, SA	25%	Consumption
C and I 30	Business	6	VIC, SA	30%	Consumption
C and I 50	Business	13	VIC, SA	50%	Consumption
C and I 100	Business	6	VIC, SA	100%	Consumption
Total Number of Customers		50			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	-	2,183	2,183

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
2,183	✓	✓

41. Synergy – NaturalPower

Stantons International Pty Ltd's independent audit states that the GreenPower Annual Audit Report of Synergy's 'NaturalPower' GreenPower Product for the Settlement period 1 January to 31 December 2011 is fairly presented, and in accordance with applicable Accounting Standards and the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
NaturalPower	Residential / Business	7,322	WA	2%-100%	Consumption
Total Number of Customers		7,322			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	14,143	31,519	45,662

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
45,662	✓	✓

42. Synergy – EasyGreen

Stantons International Pty Ltd's independent audit states that the GreenPower Annual Audit Report of Synergy's 'EasyGreen' GreenPower Product for the Settlement period 1 January to 31 December 2011 is fairly presented, and in accordance with applicable Accounting Standards and the requirements of the National GreenPower Accreditation Program as defined in the National GreenPower Accreditation Program Rules, Version 7 (January 2011).

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
EasyGreen	Residential	1,517	WA	\$10-\$80 per bill	Block based
Total Number of Customers		1,517			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	1,498	-	1,498

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
1,498	✓	✓

43. TRUenergy – TRUenergy Green

Beca's independent audit states that TRUenergy's GreenPower Technical Reports for the Settlement Period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
Go Green	Residential	46,590	NSW, VIC, QLD, SA	10%	Consumption
TRUenergy Planet	Residential	2,616	NSW, VIC, QLD, SA	20%	Consumption
TRUenergy Planet Starter	Residential	7,978	NSW, VIC, QLD, SA	10%	Consumption
TRUenergy Planet Plus	Residential	528	NSW, VIC, QLD, SA	50%	Consumption
TRUenergy Wind Power	Residential	849	NSW, VIC, SA	100%	Consumption
TRUenergy Eco Friendly - 2.5%	Business	515	NSW, VIC, QLD, SA	2.5%	Consumption
TRUenergy Eco Friendly - 5%	Business	19	NSW, VIC, SA	5%	Consumption
TRUenergy Eco Friendly - 10%	Business	273	NSW, VIC, QLD, SA	10%	Consumption
TRUenergy Eco Friendly - 100%	Business	3	NSW, VIC, QLD	100%	Consumption
TRUenergy Eco Friendly - 25%	Business	105	NSW, VIC, QLD, SA	25%	Consumption
TRUenergy Eco Friendly - 50%	Business	34	NSW, VIC, QLD, SA	50%	Consumption
TRUenergy Eco Friendly - 75%	Business	10	NSW, VIC	75%	Consumption
TRUenergy Wind Power	Business	180	NSW, VIC, QLD, SA	100%	Consumption
TRUenergy Green 100%	Business	1	VIC	100%	Consumption
TRUenergy Green 25%	Business	4	VIC	25%	Consumption
TRUenergy Green 10%	Business	113	VIC	10%	Consumption
Total Number of Customers		59,818			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	40,930	29,566	70,496

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
70,496	✓	✓

44. TRU Pure – PureEnergy

Beca's unqualified opinion is that TRUenergy's GreenPower Technical Reports (including PureEnergy) for the settlement period 1 January to 31 December 2011, are fairly presented, and in accordance with the requirements of the National GreenPower Accreditation Program as defined in the Program Rules.

Table 1: Product Details

Product Options	Residential / Business	Number of Customers	Australian Jurisdictions	GreenPower Accreditation	Consumption / Block
PureEnergy 10	Residential	31,660	NSW, QLD & ACT	10%	Block based
PureEnergy 10	Business	96	NSW, QLD & ACT	10%	Consumption
PureEnergy 25	Residential	4,006	NSW, VIC, QLD & ACT	25%	Block based
PureEnergy 25	Business	538	NSW, VIC, QLD & ACT	25%	Consumption
PureEnergy 50	Residential	1,410	NSW, VIC, QLD & ACT	50%	Consumption
PureEnergy 50	Business	124	NSW, VIC, QLD & ACT	50%	Consumption
PureEnergy 100 (including Premium)	Residential	3,425	NSW, VIC, QLD & ACT	100%	Consumption
PureEnergy 100 (including Premium)	Business	556	NSW, VIC, QLD & ACT	100%	Consumption
PureEnergy Choice (C&I)	Business	2,576	NSW, VIC, QLD & ACT	1-100%	Consumption
Total Number of Customers		44,391			

Table 2: GreenPower Sales

	Residential (MWh)	Business (MWh)	Total (MWh)
GreenPower Sales	56,839	320,474	377,313

Table 3: Surrender of LGCs

LGCs Surrendered	Sufficient LGCs Surrendered	GreenPower Approved LGCs
377,313	✓	✓

EnergyAustralia's PureEnergy GreenPower products moved to TRUenergy when TRUenergy acquired EnergyAustralia on 1 March 2011. PureEnergy products were audited by Beca for the entire calendar year within the TRUenergy 2011 GreenPower Audit.

Appendix 1: GreenPower Accredited Generators used during 2011 Settlement Period

Alinta Wind Farm (formerly Walkaway)	WD00WA08
Awaba Renewable Energy Facility	BEBGNS11
Atlas Renewable Energy Facility	BEBGWA10
Ballarat Landfill	BEBGVC14
Ballarat Solar Park	SRPVVC06
Banimboola Power Station	HY00VC07
Bendigo Renewable Energy Facility	BEBGVC15
Bendigo Solar Park	SRPVVC05
Blayney Wind Farm	WD00NS02
Browns Plains Landfill	BEBGQL01
Camellia Biogas Power Station	BEBGNS07
Cape Bridgewater Wind Farm	WD00VC10
Cathedral Rocks Wind Farm	WD00SA05
Challicum Hills Wind Farm	WD00VC03
Chichester Dam	HYMCNS01
Clements Gap Wind Farm	WD00SA11
Codrington Wind Farm	WDOOVC01
Crookwell Wind Farm	WD00NS03
Darwin Renewable Energy Facility	BEBGNT01
Dungog WFP	HYMCNS03
Eastern Creek 2 Renewable Energy Facility	BEBGNS13
Eastern Creek Landfill Power Station	BEBGNS06
Emu Downs Wind Farm (EDWF)	WD00WA09
Grange Ave Landfill	BEBGNS10
Hallam Hydro Plant	HYMIVC06
Hallam Road Renewable Energy Facility	BEBGVC12
Hallett 2 Wind Farm	WD00SA10
Hallett Wind Farm	WD00SA08
Hampton Wind Park	WD00NS04
Hepburn Community Wind Farm	WD00VC12
Homebush Photovoltaic Power Station	SRPVNS02
Huxley Hill Wind Farm (King Island)	WD00TA01
Jacks Gully WMC	BEBGNS03
Jounama Hydro	HY00NS13
Kelvin Road Landfill Gas Power Generation Facility	BEBGWA07
Koombooloomba Hydro (previously known as K5 unit)	HYMIQL01
Kooragang Wind Turbine	WD00NS01
Lake Bonney Stage 1 Wind Farm	WD00SA02
Lake Bonney Stage 2 Wind Farm	WD00SA07
Lake Bonney Stage 3 Wind Farm	WD00SA12
Landers Shute Pipeline	HYMCQL01
Lucas Heights 1 WMC Expansion	BEBGNS01

Millar Road Landfill Gas Power Generation Facility	BEBGWA08
Mt Millar Wind Farm	WD00SA06
Pioneer Sugar Mill	BEBMQL13
Remount Renewable Energy Facility	BEBGTA04
Rochdale Renewable Energy Facility	BEBGQL12
Rocky Point Sugar Mill Upgrade	BEBMQL28
Roghan Road Landfill	BEBGQL11
Singleton Photovoltaic Power Station	SRPVNS03
Sleeman Sports Centre Landfill	BEBGQL14
Snowtown Wind Farm	WD00SA09
South Cardup Renewable Energy Facility	BEBGWA09
South Johnstone Sugar Mill	BEBMQL16
Starfish Hill Wind Farm	WD00SA01
Sydney Superdome Photovoltaic	SRPVNS01
Tableland Sugar Mill	BEBMQL09
The Drop Hydro	HYMINS09
Thursday Island	WD00QL02
Tinaroo Hydro	HYMIQL04
Toora Wind Farm	WD00VC02
Tweed Renewable Energy Facility	BEBGNS09
Waterloo Wind Farm	WD00SA13
Wattle Point Wind Farm	WD00SA04
Waubra Wind Farm	WD00VC09
Whitwood Road Renewable Energy Facility	BEBGQL10
Windy Hill Wind Farm Stage 1	WD00QL01
Wivenhoe Mini Hydro	HYMIQL03
Wollert Renewable Energy Facility	BEBGVC11
Wonthaggi Wind Farm	WD00VC06
Woodlawn Bioreactor	BEBGNS12
Woolnorth Studland Bay Wind Farm	WD00TA04
Woolnorth Bluff Point Wind Farm	WD00TA02
Wyangala B	HYMINS11
Wyndham LFG	BEBGVC07
Yambuck Wind Farm	WD00VC08

Appendix 2: National GreenPower Accreditation Program: Program Rules

National GreenPower Accreditation Program:

Program Rules

Version 7

January 2011



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1. The National GreenPower Accreditation Program

1.1 Introduction

The *National GreenPower Accreditation Program: Program Rules* (formerly titled the *National GreenPower Accreditation Program Accreditation Document Version 3.4*) outlines the terms and conditions of participation in the National GreenPower Accreditation Program for GreenPower Providers and GreenPower Generators. It provides participating electricity GreenPower Providers and GreenPower Generators with information about the National GreenPower Accreditation Program, including:

- Section 1 Background and aims of the National GreenPower Accreditation Program; interaction with sustainable energy schemes in Australia
- Section 2 Definitions for GreenPower Products, GreenPower Generators and GreenPower purchases
- Section 3 Technical Criteria for gaining and maintaining accreditation for a GreenPower Product
- Section 4 Marketing Criteria for gaining and maintaining accreditation for a GreenPower Product
- Section 5 Eligibility requirements for GreenPower Generators
- Section 6 GreenPower Provider reporting and annual audits
- Appendix A Assessment guidelines for approval of GreenPower Generators
- Appendix B Application for GreenPower Generator approval
- Appendix C Definitions of terms
- Appendix D National GreenPower Steering Group Charter

1.2 Background

In 1997, the Sustainable Energy Development Authority (SEDA) in NSW established the GreenPower Accreditation Program to accredit electricity retailers' Renewable Energy products (N.B. SEDA's functions were incorporated into the NSW Department of Energy, Utilities & Sustainability (DEUS) on 1 July 2004 and DEUS' functions were incorporated into the NSW Department of Water and Energy (DWE) on 27 April 2007 and DWE's Energy Division functions were incorporated into Industry and Investment NSW on 1 July 2009). The program was developed in consultation with the energy industry, and various non-government organisations including the Australian Consumers Association, Greenpeace, the Australian Conservation Foundation and the World Wide Fund for Nature.

The program is now offered nationally through joint collaboration by participating jurisdictions, collectively known as the National GreenPower Steering Group (NGPSG).

As of March 2005 any organisation (including non-licensed energy retailers) that is eligible to purchase Renewable Energy Certificates are eligible to develop a product for accreditation as a GreenPower Product. As a result, all relevant references to 'retailers' in the Program Rules have been replaced with 'GreenPower Provider'.

Mission

Driving investment in Renewable Energy in Australia, with a view to decreasing greenhouse gas emissions from the generation of electricity, by increasing awareness of, and ensuring consumer confidence in, environmentally sound Renewable Energy products.

Aims

- To facilitate the installation of new Renewable Energy generators across Australia beyond mandatory renewable requirements.
- To encourage growth in consumer demand for Renewable Energy.
- To provide consumer choice for, and increase confidence in credible Renewable Energy products
- To increase consumer awareness of Renewable Energy and greenhouse issues.

- To decrease greenhouse gas emissions associated with electricity generation.

The National GreenPower Accreditation Program is an independent test for products offered by GreenPower Providers. Those that meet the Accreditation Criteria earn the right to use the GreenPower Product logo, providing customers assurance that their products adhere to these requirements and that monies will be put towards the purposes expected.

Both GreenPower Providers and GreenPower customers benefit from promotional packages, developed by the National GreenPower Accreditation Program's State and Commonwealth participants, which includes the use of the GreenPower logos at no cost (see Section 4), and may include joint promotional events and advertising through both print and electronic media.

National GreenPower Steering Group (NGPSG)

In May 2000, the National GreenPower Steering Group (NGPSG) was officially established to oversee management of the program. This governing body is comprised of representatives from state government agencies from NSW, Victoria, Queensland, Western Australia, South Australia and the ACT.

Program Managers

Accreditation:

Industry and Investment NSW has been appointed as Program Manager: Accreditation and administers the program on behalf of the NGPSG for GreenPower Products and GreenPower Generators.

Sustainability Victoria has been appointed as Program Manager: Marketing and administers the national marketing functions of the program on behalf of the NGPSG.

Refer to the Charter in Appendix D for further details on the role of NGPSG, and respective responsibilities of the Program Manager and the NGPSG.

1.3 Interaction with Other Sustainable Energy Schemes in the Australian Electricity Market

The Federal Renewable Energy Target (RET)

The Renewable Energy Target (RET) scheme has been established to encourage additional generation of electricity from renewable energy sources to meet the Government's commitment to achieving a 20% share of renewables in Australia's electricity supply in 2020.

The RET legislation places a legal liability on wholesale purchasers of electricity to proportionally contribute to an additional 45,000 gigawatt hours (GWh) of renewable energy per year by 2020. The legislation also sets the framework for both the supply and demand of renewable energy certificates (RECs) via a REC market.

The RET provides renewable energy power stations and owners of solar water heater and small generation unit installations (small-scale solar PV panels, wind and hydro electricity systems) with a financial incentive through the creation and trade of renewable energy certificates (RECs) via the REC Registry.

The *Renewable Energy (Electricity) Amendment Bill 2010* was passed by the Federal Parliament on the 24 June 2010 and received Royal Assent on 28 June 2010.

As of 1 January 2011, the RET will be split into two parts, the Large-scale Renewable Energy Target (LRET) and the Small-scale Renewable Energy Scheme (SRES).

Certificates created under the LRET will be Large-scale Generation Certificates (LGCs) whilst those created under the SRES will be Small-scale Technology Certificates (STCs).

Only LGCs will be accepted within the GreenPower Program. STCs will not be accepted within the Program for 2011 compliance purposes.

The RET and the National GreenPower Accreditation Program have similar objectives - to reduce greenhouse gas emissions from the electricity generation sector and drive investment in renewable energy projects. However, the two schemes utilise very different mechanisms to deliver the same objective - RET is a Federal mandatory requirement, while GreenPower relies on voluntary participation by consumers.

The Renewable Energy purchased to make GreenPower sales will not be able to be used by energy suppliers to meet their RET obligations.

Refer to Section 3.8 for accreditation requirements related to the interaction of GreenPower and the RET.

The Victorian Renewable Energy Target (VRET)

The Victorian Renewable Energy Target (VRET) scheme has now ended and was transitioned into the Commonwealth's expanded Renewable Energy Target (eRET) in stages throughout the calendar year 2010.

The VRET scheme commenced operating on 1 January 2007. The Victorian Renewable Energy Act 2006 (the Act) established the VRET scheme which mandated Victoria's consumption of electricity generated from renewable sources was increased to 10% by 2016. The aim of the VRET scheme was to encourage additional generation of electricity from renewable sources.

The Victorian Essential Services Commission (ESC) was responsible for administering the VRET scheme.

Renewable Energy purchased to meet GreenPower sales obligations could not be used by GreenPower Providers to meet their VRET obligations.

The VRET transition was a result of the Commonwealth's establishment of the eRET scheme through the enactment of the *Renewable Energy (Electricity) Amendment Act 2009* (Commonwealth Amendment Act).

For more information on the transition, please refer to <http://www.esc.vic.gov.au/public/VRET/>

Future Mandatory Energy Targets

GreenPower will interact with all future mandatory energy targets in a similar way to those already in existence. That is, Renewable Energy purchased to make GreenPower sales will not be able to be used by GreenPower Providers to meet mandatory obligations.

The NSW Greenhouse Gas Reduction Scheme

From 1 January 2003, NSW electricity retailers (and certain other parties) were required to meet mandatory targets for abating greenhouse gas emissions from electricity production and use. This scheme is known as the NSW Greenhouse Gas Abatement Scheme and is implemented through the *Electricity Supply Amendment (Greenhouse Gas Emission Reduction) Act 2002*.

Electricity retailers are required to reduce emissions in line with a sector-wide greenhouse 'benchmark', by sourcing cleaner energy supply and promoting energy efficiency. The sector-wide benchmark is to reduce emissions to 5 per cent below 1990 per capita emission levels, equivalent to 7.27 tCO₂-e per capita. Electricity retailers are required to meet annual reduction targets to achieve the benchmark. Targets each year will be enforced, with electricity retailers paying a penalty where they fail to meet their annual benchmarks.

Under this scheme, GreenPower Providers are not able to count sales and associated greenhouse gas reductions made through their GreenPower Products towards meeting their compliance targets.

The NSW Government has legislated that the NSW Greenhouse Gas Abatement Scheme will remain in place until 2020 and beyond, or until the commencement of a national emissions trading scheme.

For more information on the scheme, visit www.greenhousegas.nsw.gov.au, or contact the NSW Industry Pricing and Regulatory Tribunal (IPART) which is responsible for administering the scheme.

The Carbon Pollution Reduction Scheme

The proposed Carbon Pollution Reduction Scheme (CPRS) is an emissions trading scheme which would use a cap and trade mechanism. The cap - an upper limit on the country's carbon pollution that will be reduced in future years - achieves the environmental outcome. The ability to trade ensures that pollution reduction opportunities throughout the economy are harnessed which reduces the economic cost of meeting our ambitious carbon pollution reduction targets. The CPRS introduces a price on carbon pollution and ensures that all businesses take this into account when making their business decisions.

On 27 April 2010, the Prime Minister announced that the Government has decided to delay the implementation of the CPRS until after the end of the current commitment period of the Kyoto Protocol in 2012, and only when there is greater clarity on the action of other major economies including the US, China and India. Therefore any potential impact of the CPRS on the GreenPower Program is unknown.

The Kyoto Protocol

The Kyoto Protocol is an international agreement created under the United Nations Framework Convention on Climate Change (UNFCCC) in Kyoto, Japan in 1997. The Kyoto Protocol has been ratified by 188 countries and entered into force in 2005. It requires developed country Parties to take on binding emission reduction or limitation targets. The targets take the form of an absolute emissions cap for each country for the 2008 to 2012 period, and in aggregate equate to 5.2 per cent below 1990 baseline levels. International negotiations are currently underway to address climate change beyond the first compliance period of the Kyoto Protocol, which ends in 2012.

On 3 December 2007 the Australian Federal Government signed the instrument of ratification of the Kyoto Protocol which came into effect on 11 March 2008. Under the Protocol Australia has committed to ensuring its greenhouse emissions in the period 2008 to 2012 are no more than 8 per cent above 1990 levels. Australia remains on track to meet its Kyoto target with emissions expected to reach an average of 583 Mt CO₂-e per annum over 2008-2012, which is 7 per cent above 1990 levels.

Australia's Kyoto target represents a minimum, not absolute, level of effort with respect to emissions reductions. The Commonwealth Government has the ability to force a higher level of effort through the cancellation of Kyoto units, leading to a decrease in the cap and additional abatement.

The interaction of the GreenPower Program with the Kyoto Protocol is unknown until further information is provided by the Commonwealth Government.

The National Carbon Offset Standard

The National Carbon Offset Standard applies to the voluntary carbon market. The Standard provides guidance on what constitutes a genuine, additional voluntary offset. It sets minimum requirements for the verification and retirement of voluntary carbon credits and provides guidance for calculating the carbon footprint of an organisation or product for the purpose of achieving 'carbon neutrality'. The Standard also provides a voluntary standard for businesses to use in becoming carbon neutral or developing carbon neutral products.

The Department of Climate Change and Energy Efficiency and the [Australian Carbon Trust](#), who are the administrators of the NCOS Carbon Neutral Program, will be conducting consultations on the NCOS Offsets section of the Standard in 2011. For further information refer to <http://www.climatechange.gov.au>

The interaction of the GreenPower Program with the NCOS will not be known until after the consultation process has been finalised.

The National Greenhouse and Energy Reporting System

The [National Greenhouse and Energy Reporting Act 2007](#) (the NGER Act) introduced a [national framework](#) for the reporting and dissemination of information about greenhouse gas emissions, greenhouse gas projects, and energy use and production of corporations.

The objectives of the NGER Act, as stated in the legislation, are to inform government policy and the Australian public; help meet [Australia's international reporting obligations](#); assist Commonwealth, state and territory government programs and activities; avoid the duplication of similar reporting requirements in the states and territories; and underpin the introduction of an emissions trading scheme.

The first annual reporting period began on 1 July 2008.

Corporations that meet an NGER threshold must report their greenhouse gas emissions; energy production; energy consumption; and other information specified under NGER legislation.

The Department of Climate Change and Energy Efficiency are currently conducting a consultation process on the treatment of voluntarily purchased renewable energy in the NGERS. For further information refer to <http://www.climatechange.gov.au>

The interaction of the GreenPower Program with the NGERS will not be known until after the consultation process has been finalised.

2. GreenPower Providers, Products, Generators and Acquisitions

This section defines GreenPower Providers, GreenPower Products and GreenPower Generators, in addition to requirements related to the use of GreenPower Generators. Eligibility criteria for Generators are outlined in Section 5. Further details on applying for generator approval can be found in Appendix B with related definitions provided in Appendix C.

2.1 What is a GreenPower Provider?

A GreenPower Provider is an energy provider that has entered into a contractual agreement with the GreenPower Program Manager to sell GreenPower Products and has had a GreenPower Product accredited by the Program Manager.

2.1.1 GreenPower Provider Fees

The GreenPower Provider agrees to pay to the Program Manager an annual accreditation fee of five thousand dollars (\$5,000) as a contribution to the cost of administering the National GreenPower Accreditation Program.

Any new provider that first sells GreenPower to customers within the fourth quarter of the calendar year will be charged half of the annual fee in their first year of participation.

The NGPSG reserves the right to review and increase this fee.

2.2 What is a GreenPower Product?

GreenPower Products provide a 'green' tariff option to electricity purchasers (residential and/or commercial customers). The GreenPower Provider commits to ensuring an equivalent amount of Renewable Energy is produced from GreenPower Generators to the amount of GreenPower energy requested (purchased) by the GreenPower Customer.

The term 'GreenPower Product' refers only to the GreenPower accredited portion of any product offering by a GreenPower Provider.

2.2.1 Process of Product Accreditation

Any energy provider may apply to join the National GreenPower Accreditation Program. Energy providers should note that individual GreenPower Products, rather than GreenPower Providers, are accredited and that GreenPower Rights may not be traded outside of this scheme. A GreenPower Provider may choose to offer one or several GreenPower Products. Each GreenPower Product requires a separate application, which includes details on administration, eligible GreenPower Customers and a portfolio of 'green' generators. To offer GreenPower Products, GreenPower Providers must also meet any local jurisdictional licensing requirements.

The application process for GreenPower accreditation involves the following steps:

1. The applicant will be required to sign a contract with the Program Manager that specifies the undertakings of both parties. Execution of this contract entitles the applicant to use the GreenPower Logos and all other accreditation materials (promotional and reporting) available for any GreenPower accredited Products.
2. Request from the Program Manager the necessary GreenPower documentation and forms, including the contract, logo guidelines and logo license application forms (see 'Use of GreenPower Logos' in Section 4).
3. Forward the completed application form, contract and all necessary attachments to the Program Manager, allowing at least three weeks for initial assessment.
4. The Program Manager assesses the application for accreditation. Where the application does not meet the criteria of the National GreenPower Accreditation Program, or where insufficient details are provided, applicants are advised accordingly and amendments suggested.
5. Once the GreenPower Product has been approved, and the contract executed by the Program Manager, the GreenPower Provider will then be advised by letter.

6. The GreenPower Provider may apply to have further GreenPower products accredited at a later time and the contract will be amended accordingly.

When offering electricity contracts and tariffs, GreenPower Providers may wish to offer a combination of 'green' electricity with non-green electricity. Some GreenPower Customers will only wish to purchase a portion of their energy or elect a block tariff option associated with only a certain amount of energy from GreenPower Generators. Allowance for this has been made in the development of the National GreenPower Accreditation Program, whereby the 'green' component of a blend can be accredited.

On an annual basis, an independent auditor performs a technical audit of each GreenPower Provider's accredited Products to ensure continual compliance with the Accreditation Criteria outlined in Section 3.

2.2.2 Breaches and Withdrawal of Accreditation

The Program Manager, after agreement from the NGPSG, may withdraw accreditation from a GreenPower Product the operation of which has breached, or failed to comply with, the Accreditation Criteria (Section 3).

The Program Manager will advise the GreenPower Provider of any apparent breach of the Accreditation Criteria by way of a "show cause" notice of the apparent breach. Where the GreenPower Provider does not rectify the breach or provide evidence to the contrary within the required time period, the Program Manager will put the GreenPower Provider on probation and advise the NGPSG accordingly. The GreenPower Provider will be given a set period during which to rectify the breach of accreditation, and where the breach is not rectified during the time period the Program Manager will advise the NGPSG accordingly, and accreditation of the GreenPower Product will be withdrawn subject to NGPSG agreement. Details of any breaches, notices and withdrawal of accreditation will be listed in the annual GreenPower Audit.

If accreditation of a GreenPower Product is withdrawn, the GreenPower Provider will be required to cease promotion of the GreenPower Product and notify their GreenPower Customers, as agreed under contract.

In the event of a delay or failure to comply with the Accreditation Criteria due to Force Majeure circumstances (Appendix C), the GreenPower Provider must provide the Program Manager with sufficient details of the issue. Allowable concessions may then be considered by the Program Manager in consultation with the NGPSG. If the delay or failure to comply exceeds a 30 day period (or such timeframe as agreed to by Program Manager), accreditation may be withdrawn.

2.2.3 Changes to the Accreditation Program

The NGPSG reserves the right to review and amend the operation and conditions of the National GreenPower Accreditation Program and these Program Rules. The Program Manager will notify the GreenPower Provider of any proposed amendments to the operation and conditions of the National GreenPower Accreditation Program and the Program Rules. The GreenPower Provider will be given the opportunity to provide feedback in the review process at least one month prior to such amendments taking effect. Where necessary, the GreenPower Provider will be given reasonable time to adapt the existing GreenPower Product to meet any requirement modifications.

2.2.4 Special Waiver of Program Rules

The GreenPower Program Manager – Accreditation may waive any requirement of these Program Rules on a case by case basis. Any waiver under this section must first be approved through a unanimous vote of the National GreenPower Steering Group.

Before any waiver will be provided under this section the proponent must satisfy all of the following conditions:

- The proponent must demonstrate that it is unable to comply with the Rule/s due to extraordinary circumstances;
- The overall objectives of the scheme must not be compromised; and
- The proponent will be required to revise systems and processes to the satisfaction of the NGPSG, specifying what actions will be taken to rectify all systems and processes to ensure that a similar special waiver situation cannot reoccur.

Potential applicants should note that meeting the above criteria does not guarantee that a waiver will be granted.

For the purposes of a Special Waiver application extraordinary circumstances may arise due to, but are not limited to, any of the following events:

- Compliance by the proponent is likely to adversely impact on the Program;
- Compliance by the proponent is likely to adversely impact on their ability to participate in the Program;
- Compliance is likely to significantly impact the proponent due to unusual circumstances;
- Changes to Government Legislation or Program Rules that are likely to adversely impact upon the ability of the proponent to participate in the Program or will otherwise adversely affect the proponent in its efforts to participate in the Program

If the NGPSG grants a Special Waiver approval a set of conditions will be attached to the approval, including actions to rectify any systems or processes which resulted in the Special Waiver application.

The NGPSG reserves the right to decline Special Waiver applications from proponents who have previously been granted a Special Waiver approval under similar circumstances. The NGPSG also reserves the right to decline Special Waiver applications where it considers that it would not be in the overall interests of the Program to grant the approval.

All public communications related to the Special Waiver must first be approved by the NGPSG.

Any Special Waiver relating to the Program Rules under Section 3: GreenPower Product Technical Criteria will be published in the Annual Compliance Audit.

All media and Public Relations costs related to the Special Waiver will be met by the proponent.

Special Waiver applications for the 2011 Settlement Period relating to Section 3: GreenPower Product Technical Criteria should be submitted to the NGPSG by 31 January 2011. Applications received after this date may not be considered until 2012.

A flowchart showing the Special Waiver process and some indicative timelines is provided in Appendix C.

2.3 Use of GreenPower Generators

All electricity generators used in a GreenPower Product must be approved as a GreenPower Generator by the Program Manager. Under the National GreenPower Accreditation Program, a GreenPower Generator is defined as 'an electricity generator that results in greenhouse gas emission reductions (within the electricity sector), Net Environmental Benefits, is based primarily on a Renewable Energy resource, and is approved by the Program Manager.

For greenhouse gas emission reductions the GreenPower Program uses a conversion factor of 1MWh = 1 tonne CO2 equivalent.

All projects are individually assessed for approval against eligibility criteria (Section 5) and other generation type-specific considerations (Appendix A), and require support from consumer and environmental stakeholders.

Please note that "primarily based on a Renewable Energy resource" means that more than half of the energy output must be attributed to an eligible Renewable Energy resource. Non-renewable resources are those based on fossil fuels.

The major renewable electricity generation types include:

- Solar Photovoltaic and Solar Thermal Electric Systems
- Wind Turbines and Wind Farms
- Hydro-Electric Power Stations
- Biomass-Fuelled Power Stations
- Geothermal Power Stations
- Wave and Tidal Power Stations.

Section 5 outlines the eligibility requirements for all GreenPower Generators. Refer to Appendix A for approval considerations for each generation type, and relevant environmental and consumer considerations.

2.3.1 Definition of a GreenPower Generator

A GreenPower Generator is defined as an electricity generator or increase in generator capacity¹, which was commissioned or first sold energy (whichever is earlier) after January 1, 1997 and that has been accredited under the National GreenPower Accreditation Program.

2.3.2 Approval Process

GreenPower Providers must ensure that all generators to be used in their GreenPower Product have been given written GreenPower approval, prior to the inclusion of these generators in the GreenPower Product (as under Section 3.2). Either GreenPower Providers or generator owners can request for approval. The approval application process, and associated fees, for GreenPower Generators is outlined in Appendix B.

The date of accreditation for a generator will be the date on which the application is approved by the Program Manager.

GreenPower Providers should advise the Program Manager of the addition of any New GreenPower Generators to the GreenPower Product as soon as practicable. GreenPower Providers will be required to report regularly to the Program Manager of all GreenPower Generators used in the GreenPower Product (see Reporting Section 6).

2.3.3 Generator Pre-approval

Power station developers, generator owners or GreenPower Providers may approach the Program Manager at any time to inquire about possible eligibility of generators for GreenPower approval. However, while a preliminary view can be given as to the likely eligibility of a generator (subject to provision of project-specific information including site/location details, environmental and consumer considerations), the proponent will be required to submit a formal application and pay the associated fee for approval once all details are finalised, including fuel sources, technologies and environmental management (as specified in Appendix B).

2.4 GreenPower Acquisitions

As of 1 July 2001, GreenPower Providers were able to purchase and on-sell the GreenPower Rights (GPRs) separately to the electricity produced from a GreenPower Generator, for use in GreenPower Products.

2.4.1 GreenPower Rights

From 1 January 2011 GPRs are no longer required or accepted in the Program. All GreenPower sales to customers will require one LGC to be surrendered for each MWh sold. The GreenPower compliance audit will focus solely on LGCs.

2.5 Dispute Resolution

The Program Manager is acting on behalf of the NGPSG. As such a GreenPower Provider or GreenPower Generator owner has the right to appeal to the NGPSG if there is a dispute over the Program Manager's decision regarding GreenPower Product accreditation, generator approval, ownership of GreenPower Rights or other. The decision of the NGPSG is final and cannot be contested.

3. GreenPower Product Technical Criteria

Sections 3 and 4 define the Technical and Marketing Accreditation Criteria for a product to gain and maintain accreditation under the National GreenPower Accreditation Program. GreenPower Providers are audited against these criteria on an annual basis, and information is made publicly available.

¹ Where it involves an increase in generator capacity (e.g. upgrades), new generation is measured as that generation which occurs over and above the existing installed capacity as a result of significant capital investment.

3.1 Technical Auditing

The GreenPower Provider must provide the Program Manager with the reports and other information necessary to carry out a technical audit of all GreenPower Products each year. The technical report must be audited by an independent and suitably qualified auditor (Tier 1 or Tier 2 accounting companies) approved by the GreenPower Provider.

This audited technical report and a separate audit statement prepared by the independent auditors must be provided to the Program Manager in the format specified by the Program Manager and in the timing referred to in Section 6. If a GreenPower Provider fails to submit the technical report in the specified time frame without prior written consent from the Program Manager, it will be considered a breach of accreditation and accreditation may be withdrawn (as per Section 2.2.2).

In cases where it is deemed necessary for auditing purposes, GreenPower Providers will be required to provide financial statements upon request by the Program Manager.

3.2 Use of GreenPower Generators

All electricity generators installed as a result of or used by GreenPower Products must:

- be approved by the Program Manager; and
- conform to the definition and eligibility requirements of a GreenPower Generator as set out in Section 5.

The Program Manager, on behalf of the NGPSG, has the right to disallow particular generators that in its opinion do not fulfil the definition of a GreenPower Generator.

3.3 Changes to the GreenPower Product and Generators

GreenPower Providers must alert the Program Manager in writing of any changes that are made to the operation of the GreenPower Product (e.g. GreenPower Product structure, changes in fuel sources, etc) prior to those changes taking effect.

GreenPower Providers are not required to seek approval from Industry and Investment NSW for inclusion of New GreenPower Generators, however this information must be advised in the Quarterly Report following the inclusion. It is the GreenPower Provider's responsibility to ensure that those generators being used in their product do have GreenPower approval (see 3.2).

3.4 Minimum Percentage Requirement of Accredited GreenPower in Blended Products

GreenPower Providers are required to have a minimum 10 per cent GreenPower content in products offered to residential customers for all products. The minimum GreenPower content of residential block-based products is set at 647kWh/year from 1 January 2007 to 31 December 2011. This value represents 10 per cent of the national average residential electricity consumption (based on 2003-2004 ESAA data).

The above figure will be reviewed and stakeholder consultation undertaken during 2011. This will allow the amount for residential block based products to be upgraded from 2012 onwards.

3.5 Claims of Eligible Generation for GreenPower Products

The Program Manager will only accept claims for GreenPower generation purchases as valid, if it can be verified that:

- An LGC is surrendered for each MWh of GreenPower generation sold through the GreenPower Product (subject to conditions outlined in Section 3.8); and
- Where only a proportion of the generation from a GreenPower Generator is eligible for use in a GreenPower Product (see Section 5.2.2), GreenPower Providers can only claim that eligible portion for a GreenPower Product, as defined under the conditions in the GreenPower Generator approval by the Program Manager.

Any claim found to be invalid (i.e. if either of the above conditions are not satisfied) will be rejected, and it will be the GreenPower Provider's responsibility to rectify the GreenPower purchase. See Section 3.6 for balancing supply and demand.

*Actual GreenPower generation output is verified through the generator reporting process as part of the Annual Audit, as outlined in Section 5.6.

3.6 Balancing GreenPower Supply and Demand

Each GreenPower Product must have an identified Settlement Period over which GreenPower supply balances demand i.e. GreenPower Providers are required to have made valid claims for GreenPower purchases (as defined in Section 3.5) equivalent to the amount sold to their GreenPower Customers through their GreenPower Product within the Settlement Period.

The Program Manager will allow a 3 month reconciliation period after the end of the Settlement Period. i.e. GreenPower Providers must have completed any GreenPower Rights transactions and surrendered the required number of LGCs, as determined by the Program Manager, within this timeframe (see Section 3.7).

The generation of any GreenPower Rights transactions which are finalised in this period after 31 December, must have occurred within the defined Settlement Period (this does not include the 3 month reconciliation period).

It is considered a serious breach of accreditation if demand is not met over the Settlement Period. In cases where there is a shortfall of valid claims for the purchase of GreenPower generation the following will apply.

- 1.(a) The Program Manager will allow a leeway for a 5 per cent shortfall on energy sales from GreenPower generation within the 1-year Settlement Period, subject to notification by the GreenPower Provider. Conditions 2 and 3 will apply.
 - (b) Where a shortfall exceeds the allowable leeway level (as specified in 1(a)), the GreenPower Provider will be placed on probation and given 2 months to rectify the shortfall via credits/rebates to affected GreenPower Customers. The GreenPower Provider must provide proof that this action is taken and the Program Manager will assess the evidence for compliance and audit the GreenPower Provider at the expense of the GreenPower Provider if necessary. Where the GreenPower Provider makes no attempt to make up the GreenPower generation shortfall, withdrawal of accreditation may be considered by the NGPSG.
2. This shortfall must be rectified in the following 1-year Settlement Period by purchasing sufficient additional GreenPower Generation (and LGCs) to make up that shortfall. Evidence of this purchase must be provided within their audited statement, submitted to the Program Manager's independent auditors at the end of the following Settlement Period for evidence of compliance.
3. Where the GreenPower generation shortfall is not made up as required in the following Settlement Period, it is considered a serious breach of accreditation and the NGPSG would then consider appropriate action, as described above in (1b).

Where GreenPower Providers have excess purchases pertaining to GreenPower generation which have not been allocated to their GreenPower Product for a defined Settlement Period, GreenPower Providers will be able to carry over a 5 per cent excess of GreenPower LGCs surrendered in the 1-year Settlement Period only to the next Settlement Period for meeting GreenPower generation demand.

Please note that any shortfall and carry-over generation used by GreenPower Providers will be publicly reported each year in annual audit reports.

3.7 Transfer and Surrender of Large-scale Generation Certificates (LGCs)

GreenPower Providers are required to surrender (or invalidate) 'eligible' LGCs (see eligibility under Section 3.8) as created under RET for each MWh of generation acquired by the GreenPower Provider and sold as part of a GreenPower Product within a Settlement Period.

The transfer and surrender of LGCs must be made each year within three months of the end of the Settlement Period, i.e. by 31 March.

3.7.1 GreenPower Designated Accounts

In order to comply, GreenPower Providers are required to set up their own GreenPower Designated Account on the nominated LGC Registry (or registries) – established to administer the RET scheme - into which LGCs

for GreenPower compliance will be transferred and then surrendered. GreenPower Providers are not permitted to use these LGCs to meet their obligations under RET.

GreenPower Providers are also required to grant the Program Manager 'view' access to their GreenPower Designated Account/s to enable the Program Manager or the auditor to complete annual audit reports.

Details on set-up, granting 'view' access and operation of GreenPower Designated Accounts can be obtained from the Program Manager.

3.8 Eligibility of LGCs

Only LGCs created by a GreenPower Generator are eligible for transfer against the requirement arising as a result of the sale of GreenPower generation. There is no requirement to transfer LGCs from the same GreenPower Generators as are used in the GreenPower Product.

LGCs created under RET are eligible to be transferred as specified under Section 3.7. For the avoidance of doubt, all LGCs created under RET are classified as GreenPower generation.

STCs derived from the use of solar water heaters are not eligible to be used within the GreenPower Program.

3.9 Shortfall in LGCs

Any sales of GreenPower generation for which a concession cannot be claimed and LGCs are not transferred, cannot be validly claimed as GreenPower. Where a shortfall for meeting supply with demand occurs as a result, the conditions outlined in Section 3.6 will apply.

For example, where a GreenPower Provider has 100GWh sales of GreenPower generation over the Settlement Period, but transferred only 70GWh of LGCs to the GreenPower Designated Account, that GreenPower Provider can only claim 70GWh GreenPower generation acquisitions for that year (as long as those GreenPower purchases satisfy all other conditions to be valid).

The GreenPower Provider shall pay to such of its customers as subscribed to the Product in the relevant period pro rata a sum equivalent to the greater of:

- a) the then prevailing market value; or
- b) the value of the consideration received by the GreenPower Provider

in respect of any LGCs which it failed to deposit into the Designated Account or any LGCs which it dealt with, in breach of its obligations under the GreenPower Provider Agreement.

3.10 GreenPower Provider Purchase of GreenPower Products

Under the Accreditation Program all GreenPower Providers are required to purchase GreenPower at a level which entitles them to use the GreenPower Customer Logo. This level is defined in "The GreenPower Logo Usage Guidelines". See Section 4.

This requirement applies to each Provider's retail arm as a minimum. Electricity consumption levels for the retail arm will be worked out with, and agreed to by, the Program Manager.

3.11 Treatment of System Losses

GreenPower Providers can choose if they wish to specify to the GreenPower Customer and Program Manager whether transmission and/or distribution system losses attributable to a GreenPower Customer are supplied from GreenPower Generators. If system losses are included, generation supplying these losses must conform to all requirements above.

4. GreenPower Product Marketing Criteria

4.1 Introduction

GreenPower Providers that offer GreenPower Products provide GreenPower Customers with the choice to make a positive contribution to the environment, encourage the development and use of Renewable Energy technologies, and open new investment opportunities in the energy sector.

To realise this market potential and maintain GreenPower Customer confidence, GreenPower Customers must be provided with clear and concise information about their electricity products and services.

4.2 Compliance Review

GreenPower Providers must submit all GreenPower marketing materials to the Program Manager for approval prior to the commencement of marketing. The Program Manager will verify compliance with the GreenPower Marketing Guidelines 2008/2009.

Compliance will subsequently be checked annually by the Provider's GreenPower Auditor as part of the annual audit process.

4.3 GreenPower Provider's Intellectual Property

The GreenPower Provider grants to the Program Manager without cost a non-exclusive licence to use any intellectual property relating to the advertising or marketing of the GreenPower Product for purposes covered by these Program Rules and the GreenPower Provider Agreement.

4.4 Provision of Information to Customers

Each GreenPower Provider wishing to use a GreenPower logo, or claim GreenPower accreditation for any of their electricity products agrees to provide all GreenPower Customers, during customer subscription and agreement fulfilment period, with contract pricing and terms and conditions written in clear, simple and easily understood terms.

4.5 Use of GreenPower Logo

The GreenPower logo has been developed to build recognition of the GreenPower brand. To strengthen the effect of these efforts, a common logo has been developed for use across Australia by GreenPower Providers, Customers and GreenPower Generators.

GreenPower Providers

It is important that GreenPower Providers support the recognition of the GreenPower brand, the accreditation processes and overall enhancement of the GreenPower concept. Providers must refer to their product's accreditation in all advertising and marketing in connection with the GreenPower Product or the Program as per the GreenPower Provider Agreement. This includes all print, broadcast & online material including a hotlink from the Logo to the GreenPower website.

The GreenPower logo must be used in compliance with the conditions of use that are available in a document entitled "GreenPower Marketing Guidelines", available from the GreenPower website (<http://www.greenpower.gov.au/greenpower-marketing-guidelines.aspx>).

GreenPower Providers are required to submit all marketing material, including all print, broadcast & online material, to the Program Manager for approval prior to publication.

Customers

Commercial GreenPower Customers may be entitled to use the GreenPower logo if they have purchased or contracted to purchase sufficient levels of GreenPower as outlined in the GreenPower Logo Usage Guidelines 2008/2009. This document also describes how and where the logos can be used, and is available from the GreenPower website (<http://www.greenpower.gov.au/using-the-greenpower-logo.aspx>)

GreenPower Providers must promote the use of the GreenPower logo to all commercial GreenPower Customers purchasing or approached to purchase a GreenPower Product by providing them with information about their eligibility to use the GreenPower logo.

GreenPower Generators

Generator owners are entitled to use the GreenPower logo where more than half of the output of the generator is classified as GreenPower generation. Additional requirements are contained in the GreenPower Logo Usage Guidelines 2008/2009. This document also describes how and where the logos can be used, and is available from the GreenPower website (<http://www.greenpower.gov.au/using-the-greenpower-logo.aspx>).

GreenPower Events

The GreenPower logo is available for use where an event will be powered by 100 per cent GreenPower accredited energy. The GreenPower logo must only be used on marketing materials directly relating to the event and it must be clearly communicated that the event rather than the entire company responsible for the event is purchasing GreenPower. Additional requirements are contained in the GreenPower Logo Usage Guidelines 2008/2009. This document also describes how and where the logos can be used, and is available from the GreenPower website (<http://www.greenpower.gov.au/using-the-greenpower-logo.aspx>).

Example of GreenPower Logo



4.6 GreenPower Product Disclosure Label

The purpose of the GreenPower Product Disclosure label is to establish a mechanism to differentiate GreenPower products and communicate how environmentally friendly each option actually is. It provides full disclosure of the contents of GreenPower accredited products through the inclusion of discrete percentages of all product contents. This more detailed design will present consumers with a greater amount of information. The use of the GreenPower Product Disclosure Label is now compulsory for all marketing and collateral of GreenPower accredited products. The full requirements are contained in the GreenPower Marketing Guidelines 2008/2009. This document is available from the GreenPower website (<http://www.greenpower.gov.au/greenpower-marketing-guidelines.aspx>).

Example of GreenPower Product Disclosure Label



4.7 Treatment of Blends of 'Green' and Other Energy

Prior to entering into an agreement to provide energy to a customer, and in all marketing and advertising related to the composition of a GreenPower Product, the GreenPower Provider must provide clear information about the portions of GreenPower accredited electricity and non accredited electricity that will be provided (for each level of GreenPower on offer).

Only those GreenPower Products that contain 100 per cent GreenPower are able to be described as 100 per cent renewable. No 'blended' Product (i.e. a Product containing less than 100 per cent GreenPower) may be referred to as 100 per cent renewable.

Where GreenPower accredited products are less than 100 per cent, the description of the unaccredited portion (backfill) of the product is prohibited other than referring to the backfill as other grid electricity.

Only 100% GreenPower products will be able to be described as 100% renewable.

Only 100% GreenPower products can be described as carbon neutral, having zero greenhouse emissions or zero emissions.

If a customer is offered a 'block tariff', the GreenPower Provider must clearly communicate how the 'block' is structured (e.g. proportions of GreenPower approved energy and other components) and what the 'block' translates to in terms of approximate kWh of GreenPower purchased per day/month/quarter, emphasising that calculations are based on average consumer consumption levels rather than actual.

4.8 Misleading Conduct

GreenPower Providers must ensure that they do not undertake, in the opinion of the Program Manager, misleading advertising or conduct in relation to GreenPower. Of particular importance is misleading advertising relating to the composition of GreenPower Products. GreenPower Providers must not deliberately or inadvertently mislead GreenPower Customers as to what generation types are used in their GreenPower Products, or the proportion of GreenPower from different generation types, or to the function and operation of GreenPower Rights used in their GreenPower Products. GreenPower Providers must:

- Agree to use only factually based and objectively verifiable environmental marketing claims in all advertising relating to their GreenPower Products;
- Be sufficiently clear and prominent in all advertising and marketing materials and other correspondence to potential and actual GreenPower Customers to prevent deception, in particular in regard to the GreenPower Customer's level of GreenPower purchase and in regard to the balance of the supply;
- Not represent that GreenPower Customers are actually delivered 'green' electrons from specific generation facilities;
- Not overstate environmental attributes or benefits, expressly or implicitly; and
- Present comparative claims in a manner that makes the basis for comparison clear to avoid GreenPower Customer deception.

5. GreenPower Generator Eligibility Requirements

Each electricity generator used in a GreenPower Product must be approved as a GreenPower Generator by the Program Manager prior to their inclusion in a GreenPower Product. This section defines the eligibility criteria to which all generators must comply to gain and maintain approval from the Program Manager as a GreenPower Generator.

5.1 General Definition

To be eligible for GreenPower approval, an electricity generator must result in greenhouse gas emission reduction (within the electricity sector), result in Net Environmental Benefits, be based primarily on a Renewable Energy source, and meet the eligibility requirements below.

GreenPower Generators must be accredited by ORER under the LRET and thus be able to create LGCs.

All projects are individually assessed and considered for approval against the above general definition and the eligibility criteria below, in addition to other more specific considerations outlined in Appendix A, including stakeholder consultation and acceptability for the project. Details on the application and approval process are given in Appendix B.

5.2 Eligibility Criteria

5.2.1 Minimum Renewable Energy Input

The electricity generator must be based primarily on a Renewable Energy resource. As such the proportion of eligible Renewable Energy input must exceed 50 per cent averaged over the Settlement Period. With the exception of minor contaminants, all renewable fuels used must be eligible under GreenPower.

5.2.2 Eligible Generation

Eligible generators can only create LGCs for electricity generated above their ORER baseline. Generation below the baseline does not create LGCs and therefore is not eligible for GreenPower accreditation. For further information on ORER baselines please refer to www.orer.gov.au

Only the portion of the energy generated that is based on Renewable Energy resources (i.e. >50 per cent) is eligible for GreenPower approval. The annual generation of a generator shall be pro-rated on the proportion of renewable vs. non-Renewable Energy (i.e. fossil fuel) input, as detailed in the letter of approval.

5.2.3 Approval Conditions

A generator is only eligible for GreenPower approval as long as it complies with the approval conditions defined in the approval letter, and the eligibility requirements for GreenPower Generators in this Program Rules (as modified over time).

5.2.4 Changes to the GreenPower Generator

The generator owner must notify the Program Manager in writing of any changes made, or any intention to make changes to the operation of the GreenPower Generator e.g. change in fuel sources or upgrade in capacity. It is recommended that the proponents consult the Program Manager as early as possible to confirm acceptability of these changes under the Program (e.g. eligibility of fuel sources), for an upgrade of the project's approval status.

5.2.5 Specific Exclusions and Inclusions

Generators must comply with specific eligibility criteria detailed below in Section 5.3 and Section 5.4.

5.3 Specific Exclusions

The following fuels/technologies are not acceptable for the purposes of the definition of a GreenPower Generator.

- 1) Utilisation of any materials (including wastes, primary or secondary) derived from forests other than sustainably harvested plantation forests. Plantation-derived wastes must not be sourced from plantations that clear, or have cleared after 1990, existing old growth or native forests.
- 2) Generators that involve the incineration of industrial, commercial or municipal solid wastes.
- 3) Hydro-electric projects, which require new dam construction that results in large-scale flooding of ecosystems.
- 4) Hydro-electric projects, which involve major diversion of rivers and do not adequately allow for environmental flows.

5.4 Specific Inclusions

The following fuels are acceptable Renewable Energy sources for the purposes of the definition of a GreenPower Generator.

- 1) Wood waste from clearing specified noxious weeds; sustainably managed plantations; Municipal Green Waste.
- 2) Industrial, commercial and municipal solid wastes (excluding incineration). Where a fossil fuel component is mixed in with the waste stream and cannot be reasonably removed from the fuel mix, the fossil fuel component will be netted out on a pro-rated basis (according to calorific value of fossil fuel component).

5.5 Treatment of Small Generation Units (SGUs)

From 1 January 2011 STCs created by SGUs under SRES will not be eligible for GreenPower accreditation.

ORER's transitional arrangements for RECs mean that any RECs created by an SGU till the end of 2010 will be classified as LGCs. For further information please refer to www.orer.gov.au

Any LGC from an SGU to which a multiplier has been applied under the Commonwealth Solar Credits Scheme will not be eligible for accreditation under the GreenPower Program. The existing GreenPower Rules for SGUs will continue to apply under LRET.

5.6 Review Process for Accreditation

5.6.1 Special Approvals

In situations where generators do not fully meet the above criteria or assessment considerations in Appendix A, but where the generator owner or GreenPower Provider believes there is significant merit in the operation of the project or the utilisation of the fuels, the Program Manager may consider granting a special approval for the generator (subject to NGPSG endorsement). Consideration of approval will be subject to provision of project details, as well as evidence of relevant stakeholders consultation and acceptance of the project.

5.6.2 Changes to Accreditation Program

The NGPSG reserves the right to amend the operation and conditions of the National GreenPower Accreditation Program and these Program Rules. The Program Manager will notify the GreenPower Generator owner of any proposed amendments to the operation and conditions of the National GreenPower Accreditation Program and these Program Rules. Modifications will apply to all GreenPower Generators and GreenPower Products, where relevant. The GreenPower Generator owner will be given reasonable time to provide feedback in the review process prior to such amendments taking effect. Where such amendments require the GreenPower Generator owner to make alterations to the operation of the GreenPower Generator, the GreenPower Generator owner will be given reasonable time to adapt to meet any amendments.

5.6.3 Breach of Generator Approval

If a GreenPower Generator is in breach of, or is anticipated to be in breach of, the above eligibility requirements, approval conditions specified by the Program Manager (or of any other related development or environmental legislation which may impact its GreenPower compliance), the GreenPower Generator owner must notify the Program Manager immediately. The approval status of the GreenPower Generator will be reviewed. The owner will have the opportunity to provide evidence and respond to any issues raised in the review process. The Program Manager, after agreement with the NGPSG, may suspend or withdraw the approval of a GreenPower Generator if the breach is considered to conflict with the National GreenPower Accreditation Program, including these Program Rules.

An appeal may be made to the Program Manager, who will subsequently advise and make a decision with the NGPSG.

If GreenPower approval is withdrawn, the generator must notify any GreenPower Providers with which it has GreenPower purchase arrangements, and cease its supply of GreenPower to these GreenPower Providers.

5.7 Generator Reports

Generator owners will need to provide reports of annual output for each GreenPower Generator during the Settlement Period, which may be verified as part of the annual audit process. These must be provided to the Program Manager or nominated representative within 3 months following the end of the Settlement Period (on or before 31 March).

Information should include the following:

- Name of power station;
- Generation capacity (MW);
- Fuel source(s);
- Metered data for total eligible GreenPower generation (net annual output), including information on metering point;
- Volume of electricity generated (MWh);
- Period of time (dates) of electricity production;
- Details of initial purchase of GreenPower e.g. name of buyer;
- ORER status.

The Program Manager will accept reports prepared and supplied by the GreenPower Provider for GreenPower Generators where the GreenPower Generator owners have not reported directly to the Program Manager, as long as they have been signed off by the GreenPower Generator owner.

5.8 Selling GreenPower Generation

All generation sold and branded as 'GreenPower' to an end consumer must be sold as a GreenPower Product, which has been accredited under the National GreenPower Accreditation Program and subject to the Accreditation Criteria. This rule is applicable to GreenPower Generators, where the GreenPower Generator owner is selling electricity directly to a GreenPower Customer. GreenPower Generator owners will

need to submit a product application for assessment and undergo the necessary compliance reporting procedures (see Section 2.1).

If a GreenPower Generator owner fails to comply with these standard procedures and sells 'GreenPower' to customers outside of the scope of an accredited GreenPower Product, it will be considered a breach of accreditation by the GreenPower Generator, and approval may be withdrawn.

6. GreenPower Provider Reporting

The public release of information about the operation of GreenPower Providers helps to ensure the consumer confidence required to gain acceptance of GreenPower Products. Ongoing accreditation of GreenPower Products requires the GreenPower Provider to provide regular reports, parts of which the Program Manager will collate and publicly release. These reports also include information required to assess whether a GreenPower Product continues to meet the Accreditation Criteria.

The required reports are described below..

6.1 Quarterly Status Reports

Each quarterly status report provides a summary of each GreenPower Provider including sales and customer numbers for the quarter.

GreenPower Providers must provide the reports to the Program Manager within two weeks of the end of each quarter, for quarters ending 31 March, 30 June, 30 September and 31 December, each year. The report format will be provided by the Program Manager..

The quarterly status report should include the following information, in the format requested by the Program Manager.

Information intended for public release by the Program Manager:

- A breakdown of total GreenPower sales made in the quarter, between residential GreenPower Customers and commercial GreenPower Customers, and according to each state in which GreenPower Customers are based (NOTE: Only total residential and commercial figures for the GreenPower Product will be released. Sales figures by state will be released as aggregated program totals only).
- GreenPower Customer numbers, broken down between residential and commercial GreenPower Customers, and according to the location of these GreenPower Customers signed onto the GreenPower Product (state-based) (NOTE: Only total residential and commercial numbers for the GreenPower Products will be released. GreenPower Customer numbers by state will be released as aggregated program totals only.).

6.2 Annual Audit Report

The annual technical report is to be provided to the Program Manager within 3 months of end of each Settlement Period (on or before 31 March). The Program Manager or its appointed auditor will provide the report formats and details of requirements. These reports will be used in the annual audit.

Information as to which other parts of these reports remain confidential and which parts are required to be made public will be contained within the report pro-formas, which are available from the Program Manager or its appointed auditor.

Information should include the following (as required and in the format requested by the Program Manager):

- Technical reports and supporting documentation for the GreenPower Product. It is incumbent upon the GreenPower Provider to ensure that the information provided in the technical reports (in accordance with Section 3, and verification documentation for GreenPower purchases and LGC concession arrangements, to be submitted to the Program Manager have been independently audited within this timeframe;
- Report providing details of the LGCs transferred to GreenPower Designated Accounts and subsequently surrendered, and any concessions granted. The Program Manager will independently obtain records from all LGC Registries of LGC transfers into the Designated Accounts and subsequent surrender for verification with GreenPower Provider reports. The total number of LGCs held, transferred and surrendered across all GreenPower Designated Accounts and the source of these LGCs specified by GreenPower Generators will be reported in the compliance audit report;

- All relevant marketing and consumer information materials as required, to check compliance in accordance with marketing Accreditation Criteria detailed in Section 4.
- Any additional information requested by the Program Manager's independent auditor which is required to ensure the GreenPower Product's compliance with the National GreenPower Accreditation Program;
- Details of the number of MWh's sourced from each specific GreenPower Generator in a GreenPower Provider's portfolio allocated to that GreenPower Provider's GreenPower sales in the period will be reported in the Commercial-In-Confidence Audit Report.

As part of the Annual Audit process GreenPower Generators are required to submit a GreenPower Generator Report to confirm actual generation output and sales, broken down by purchaser.

Where GreenPower Generator owners do not report directly to the Program Manager or nominated representative, the Program Manager will accept reports submitted by the GreenPower Provider, as long as they have been signed off by the GreenPower Generator owner.

Any breaches of GreenPower accreditation will be reported in the Annual Audit Report.

1. General Considerations

1.1 ORER Accreditation

GreenPower Generators must be accredited by ORER under the LRET and thus be able to create LGCs. For further information please refer to www.orer.gov.au

1.2 Consumer Perceptions

The National GreenPower Accreditation Program is a voluntary market-based program mechanism for stimulating investment in new Renewable Energy generation. It is wholly dependent on GreenPower Customers generally choosing to pay more for a GreenPower Product. As such, GreenPower Customers generally wish to see their contributions leading to overall environmental improvements, i.e. they may not approve of projects which, although they produce no emissions, cause damage to the environment in some other way.

As contribution to GreenPower Products is entirely voluntary, customer perceptions of what is acceptable must, by necessity, be given careful consideration alongside any 'objective' view of the environmental merit of a particular electricity generator. The views of the local community (particularly those impacted by the project), consumer and environmental advocacy groups should therefore be taken into account by the GreenPower Provider, and will be considered by the Program Manager in assessing approval of individual generators.

1.3 Environmental Issues

Individual electricity generation projects may have adverse environmental impacts that will outweigh the benefits and would therefore not be considered acceptable for inclusion within this program. Negative environmental and/or cultural impacts of each project should be minimised to maintain consumer satisfaction. GreenPower Providers and GreenPower Generator owners are responsible for ensuring that all generation projects meet any statutory environmental, planning, and licensing requirements, and relevant environmental guidelines.

The environmental criteria for generator eligibility are related to the generation process only, and not the sustainability of the host resource industry (with the exception of energy crops). Whilst the sustainability of the host resource industry is not assessed, the impact of the individual generation project on that host industry will be taken into account. In cases where issues are raised regarding the expansion of the host industry due to electricity generation from that project, the associated impacts in the context of ecologically sustainable development will be considered.

For example, whilst concerns may be raised over the long-term sustainability of some biomass resource industries, as long as the biomass is Sustainably harvested, results in greenhouse gas reduction, and demonstrates a Net Environmental Benefit, it may be eligible for use under the National GreenPower Accreditation Program.

All submissions seeking GreenPower approval for generators must include a full, independently prepared Statement of Environmental Effects, Environmental Impact Assessment (or similar), to the satisfaction of the Program Manager. Refer to the *GreenPower Generator Approval Application* in Appendix B and Table 1 Key ESD Considerations for further information.

GreenPower approved projects must also be consistent with other federal and state government sustainability and environmental objectives, including but not limited to:

- The National Strategy for Ecologically Sustainable Development
- State and Local Government waste management policies
- National Waste Minimisation and Recycling Strategy
- Water management objectives and use of tertiary treated waste water
- Management of soil contamination issues.

1.4 Public Consultation

The Accreditation Criteria reflect the current environmental data, consumer and expert opinions of what constitutes 'green environmentally friendly' and 'sustainable energy' generation. Over time it is possible that a changing environment or technology will mean that the accreditation guidelines will change. All stakeholders will be consulted accordingly of any proposed amendments to the operation and conditions of the National GreenPower Accreditation Program and the Program Rules, and be given reasonable time to provide feedback in the review process prior to such amendments taking effect.

2. Acceptability of Generation

Eligibility criteria for generator approval are outlined in Section 5. The following section provides a guide as to the acceptability of generation projects. Clearly, these views are general and cannot take account of particular local factors that may concern potential participants. In addition to this information, the following will be taken into account in the assessment process:

1. Consumer perception of the generation process;
2. The overall impact of the generation process on greenhouse emissions;
3. Whether the process is based primarily on Renewable Energy sources;
4. The nature of the environmental impacts associated with the construction and operation of the generation facility, including the extent, intensity and duration of those impacts;
5. The level of mitigation, either planned or in place;
6. Details relating to planning approvals and environmental management procedures related to the generation process;
7. Other matters as deemed relevant by the Program Manager including the specific considerations detailed below.

If generator developers or GreenPower Providers require clarification, they can seek pre-approval of the Program Manager for individual projects (see Section 2.3.3). GreenPower Providers should avoid projects that are likely to be contentious in any way.

These guidelines will change as the program evolves and as perceptions change over time, and will be made available in the Program Rules from the Program Manager.

2.1 Types of Generation – Specific Considerations

The following types of Renewable Energy generation are generally acceptable under GreenPower.

- Solar Photovoltaic and Solar Thermal Electric Systems
- Wind Turbines and Wind Farms
- Hydro-Electric Power Stations
- Biomass-Fuelled Power Stations
- Geothermal Power Stations
- Wave and Tidal Power Stations

Specific considerations are discussed below.

Cofiring with fossil fuels

Cofiring biomass resources with fossil fuels in generators can be classified as green electricity generation for the Renewable Energy component. It should be noted that, under the definition used in the National GreenPower Accreditation Program, generators must be primarily based on Renewable Energy resources and therefore the cofiring level would by necessity be greater than 50 per cent. Each Renewable Energy component must be eligible according to GreenPower requirements. Where there are two plants feeding into one system, then the renewable component can be prorated.

Landfill Gas Generation

Methane emissions result from the decomposition of putrescible and green waste (both biomass resources) in landfill sites. The use of methane emissions from landfill sites to generate electricity has considerable

greenhouse benefits. However, the disposal of general municipal waste in landfill sites requires large quantities of land that will remain contaminated by undecomposed matter.

It is not the intention of the National GreenPower Accreditation Program to promote the development of new landfill sites, at the expense of waste minimisation. However, landfill gas generation projects are considered generally suitable for inclusion in the National GreenPower Accreditation Program. Any measures undertaken to reduce their environmental impact (such as best practice NO_x control) would assist the Program Manager in approving their use under the National GreenPower Accreditation Program.

Industrial/Commercial/Municipal Solid Wastes – Incineration

There is wide scale public concern about the operation of incinerators for solid wastes. Such generators are therefore unsuitable for inclusion in GreenPower Products. 'Green' waste incineration, where plant matter is separated from other wastes, is covered in the paragraphs below on "Wood Wastes".

Industrial/Commercial/Municipal Solid Wastes – Direct Gasification/Pyrolysis

There is significant benefit in the Gasification or Pyrolysis of mixed solid wastes that would otherwise be diverted to landfill. Aside from recovery of energy, destruction of these wastes significantly reduces the volume of waste going to landfill (approx. 95 per cent reduction), and in addition removes many problems associated with leachates and gas and odour emissions. The use of materials recovery technology also assists in reclaiming recyclable material that is mixed in with the waste stream, and would otherwise end up in landfill.

Generation plants based on these technologies are generally eligible for inclusion in GreenPower Products if the process has been approved under all relevant environmental legislation and demonstrate compliance with relevant emissions standards. Generator owners are responsible for applying the principles of the Waste Management Hierarchy, such that wherever possible, all materials able to be recycled, re-used or processed, are extracted from the waste stream. Where it is demonstrated that a fossil fuel component is mixed in with the waste stream and cannot be reasonably removed from the fuel mix, the fossil fuel component will be netted out on a pro-rated basis (according to calorific value of fossil fuel component).

Wood Wastes

Utilisation of any materials (including wastes, primary or secondary) from high conservation value forests, such as old growth forests, other native forests, and ecologically sensitive sites (for example, areas of remnant native vegetation) are not acceptable under the National GreenPower Accreditation Program.

Utilisation of waste derived from sustainably harvested plantation forests – where there are insufficient market opportunities for reuse or reprocessing of this waste – is generally acceptable under the National GreenPower Accreditation Program. These wastes must not be sourced from plantations that clear, or have cleared after 1990, existing old growth or native forests. Plantations that allow for and specify wildlife corridors and set aside areas of native forest are preferable. Demonstration of best-practice saw-milling technologies and the like would assist in the approval of generators based on forestry resources. Wood waste from clearing specified noxious weeds, where clearing activities are managed properly (e.g. to control seed spread), are acceptable, as long as commercial aims do not override the environmental management priority of weed control or elimination.

Municipal Green Waste, and wood wastes from suburban development, building and construction projects, where there are insufficient market opportunities for reuse and reprocessing, are acceptable fuel sources (as long as they are not sourced from high conservation value forests, such as old growth and other native forests, and ecologically sensitive sites). Generator owners are responsible for demonstrating that all areas from which fuels are sourced have been assessed and approved, according to any relevant statutory environmental, planning, and licensing requirements. Manufactured wood products and by-products (e.g. packing cases, furniture, crates, pallets, recycled timber) destined for disposal that are not contaminated and have not been chemically treated (e.g. toxic glues, solvents, finishes etc.), are also likely to be acceptable.

For projects using wood wastes (including Municipal Green Waste), all wood waste sources must meet the above eligibility requirements for the project to be granted GreenPower approval. Verification conditions for approval are given below.

It is the generator owner's responsibility to implement appropriate quality control systems and procedures (including auditing) to ensure all reasonable effort is made to keep contamination with ineligible wood sources to a minimum.

Where there is a degree of contamination of the wood source with ineligible wood sources, then the proportion of wood source not acceptable under these guidelines would be netted out from GreenPower on a fuel input basis.

Contamination in this case is defined as traces of unacceptable wood sources which have entered into the fuel stream for a project against all reasonable endeavours of the generator owner, and which cannot reasonably be removed.

If this is the case, the generator owner must demonstrate to the Program Manager that the ineligible wood source component due to contamination cannot be satisfactorily extracted from the fuel mix, and provide verification on the amount of generation attributable to the contamination component.

Verification conditions for approval

The Program Manager must approve any sources of wood products prior to their inclusion in a generation project based on detailed information (fuel type and origin of supply) provided by the generator owner.

Further to this, it is the generator owner's responsibility to provide verification that the wood materials supplied on an on-going basis comply with the eligibility requirements. Generator owners will be required to: -

- Provide evidence for implementing and maintaining a rigorous tracking system (e.g. detailed inventory, delivery records) to monitor all received wood sources, in terms of both source type, waste composition (by mass and energy/calorific value) and origins of supply;
- Make these records available for spot auditing by the Program Manager or other appointed independent third party, at any point in time. The generator owner must also make the site available for random on-site spot checks, which may be undertaken by the Program Manager or other appointed independent third party.
- Provide these records on a quarterly and annual basis to the purchasing GreenPower Provider and Program Manager. The Program Manager may require that these records be independently audited;
- Notify the Program Manager and request approval of any new sources in the future prior to their utilisation.

Failure to meet approval conditions and compliance requirements outlined above and, more specifically in the official letter of approval, will lead to revocation of GreenPower approval for the generator.

Refer to Table 1, Key ESD Considerations, for further information on other issues to consider and address towards receiving GreenPower approval for projects.

Agricultural and Other Biomass Wastes

Waste materials from sugar cane, winery and cotton industries, amongst others, as well as methane captured from sewerage treatment works or large scale organic composting offer considerable potential for electricity generation. Generation projects based on these resources will be assessed on a case-by-case basis.

Energy Crops

There are a wide variety of crops which could be grown specifically for energy generation purposes ("energy crops"), including crops such as timber, vegetable oils, fibre crops or complex sugars. Many of these crops have benefits in addition to the production of Renewable Energy, such as the production of timber and oils, provision of habitat corridors, alleviation of salination problems etc; and projects that have multi-use purpose may be more likely to be accepted by the community. The acceptability of various energy crops will depend upon the agricultural and harvesting practices used, and whether these are considered sustainable. Energy crops sourced from crop activities that clear, or have cleared after 1990, existing old growth or native forests, will not be accepted.

Hydro-Electric

The environmental impact and perceptions of consumers towards hydro-electric generators varies depending upon the size of the system, its location, the conservation and community value of the impacted area and the hydrology management.

Consumers may be critical of hydro-electric projects which: -

- Result in the large scale flooding of ecosystems;
- Reduce conservation values, particularly in highly sensitive areas;
- Involve major diversions of rivers;
- Provide inadequate environmental flows;
- Involve the construction of major new dams and roads in sensitive areas.

Consumers are more likely to accept projects that: -

- Have had broad stakeholder consultation and acceptance;
- Have adequate environmental flows;
- Are retrofitted dams that have been built for other purposes.

Hydro-electric projects which require new dam construction resulting in the flooding of ecosystems can have considerable impact on the environment. As a result consumer perceptions are likely to be critical and as such, projects of this nature will not be accepted for inclusion in GreenPower Products.

In addition, hydro-electric projects which divert water from rivers, or from one river to another, and do not adequately allow for environmental flows, can severely alter eco-systems associated with the river. Such projects are not accepted for inclusion in GreenPower Products.

Hydro-electric projects which involve the installation of generation facilities alongside dams which have already been built for other purposes are likely to be acceptable. In this case the production of electricity has not led directly to construction of the dam. The precise environmental impacts of any proposal need to be examined to ensure that these are minimised.

In situations where hydro-electric generators are used in pumped storage mode, only the net export of the system can be classified as 'green' electricity generation.

Wind Power and Windfarms

Wind turbines and windfarms have the ability to impact the local environment, particularly in relation to visual amenity, noise and bird-strike. Sufficient consultation with local stakeholders and efforts to minimise the impact on local amenity should be undertaken to ensure their acceptability under the National GreenPower Accreditation Program.

Solar Thermal Electric

Solar thermal electric generation plants may use a non renewable fuel such as natural gas to support the generator when sufficient solar energy is not available. In such cases, only that contribution which can be directly attributed to the Renewable Energy component would be considered to be 'green' (at a level greater than 50 per cent as per the definition of a GreenPower Generator).

Coal Mine Waste Gas and Coal Seam Methane

Coal mine waste gas generation based on vent or drainage gas from mines, where the methane must be drained for safety reasons, has the capacity to reduce greenhouse gas emissions substantially. However, coal mine waste gas is a fossil fuel, and therefore does not pass the test of being renewable. Non-waste coal seam methane is a fossil fuel equivalent to natural gas.

Coal mine waste gas and coal seam methane generation therefore cannot be considered as a Renewable Energy source under the definition of the National GreenPower Accreditation Program.

Small Generation Units (SGUs)

From 1 January 2011 STCs created by SGUs under SRES will not be eligible for GreenPower accreditation.

ORER's transitional arrangements for RECs mean that any RECs created by an SGU till the end of 2010 will be classified as LGCs. For further information please refer to www.orer.gov.au

Any LGC from an SGU to which a multiplier has been applied under the Commonwealth Solar Credits Scheme will not be eligible for accreditation under the GreenPower Program. The existing GreenPower Rules for SGUs will continue to apply under LRET.

Geothermal, Wave and Tidal Power Stations

Geothermal, wave and tidal technologies are relatively new to the Australian Renewable Energy market, and have only reached demonstration phase to date. Applications for approval for these types of projects will be accepted under the National GreenPower Accreditation Program. Generation projects based on these resources will be assessed on a case-by-case basis, and general project, community and environmental eligibility criteria will apply.

Appendix B: GreenPower Generator Approval Application

All generators used in a GreenPower Product must be GreenPower Generators, as defined in Section 2.3. GreenPower Providers must ensure that all generators to be used in their Product have been given written GreenPower approval, prior to the inclusion of these generators in the GreenPower Product. Either GreenPower Providers or generator owners can request approval. Application details are provided below.

1. Process of Application

The application and assessment process for gaining approval for a GreenPower Generator involves the following steps:

1. The generator owner or GreenPower Provider submits the GreenPower Generator Application form and any supplementary documentation to the Program Manager, allowing at least two weeks for initial assessment.
2. Where the application does not meet the requirements and guidelines in the National GreenPower Program Rules, or where insufficient details are provided, the applicant is advised accordingly. Where required by the NGPSG, a formal public consultation process will be undertaken and coordinated by the Program Manager prior to the assessment of the project for approval (see Appendix A for details). The NGPSG will accept written submissions within a specified time-frame for each round.
3. In cases where a formal consultation process is not required, the Program Manager may undertake an ad-hoc informal consultation process with stakeholders.
4. The Program Manager assesses application for approval, having regard to the fundamental objectives of the National GreenPower Accreditation Program, the generator eligibility criteria and where applicable, submissions received in the formal and informal consultation processes. Proponents will be given the opportunity to respond to issues raised.
5. If the application meets all guidelines, the Program Manager advises the applicant of this by way of an official letter of approval for the generator, and invoices the applicant for the associated fee (see Section 3 of this Appendix). The date of accreditation for a generator will be the date the application is received by the Program Manager, provided all accreditation criteria were met by the generator at that time. Subject to receiving approval the GreenPower Generator can be used in an accredited GreenPower Product and the generator owner confirming in writing acceptance of the terms of accreditation.

Required Information

The following information must be submitted such that the Program Manager can assess and approve a generator, prior to its inclusion in a GreenPower Provider's GreenPower Product: -

- Name, location (include postcode), owner of station, key contact (name and contact details), connection point;
- Commissioning date, date of first operation of each unit (where available) and date of first sale of electricity; *
- Electrical capacity of each unit (MW); *
- Expected annual energy production of station (MWh);
- Detailed description of site, including maps, schematics where available, in particular showing any water diversions for hydro projects;
- Description of operation of the generator, to clarify whether the operation may impose any environmental impacts that need consideration;
- Description of fuel sourcing, particularly for projects using biomass fuels;
- Details of any proportion of non-eligible fuel components (e.g. fossil fuels) that would need to be netted out, outlining how the Renewable Energy component would be quantified; *

- Details of auxiliary loads²
- Details of community and stakeholder consultation relating to the project; and,
- Statement of Environmental Effects (see below);
- RET accreditation details (if applicable);
- Confidentiality of information**;
- Other details required by the Program Manager

* Please note that applicants are welcome to submit a copy of the OREER Application for Accreditation with the additional details marked with *, or evidence that the OREER has deemed it ineligible for RET Accreditation.

** Please note that where generators are approved and used in a GreenPower Product, certain details provided above are released publicly under GreenPower reporting requirements (e.g. description of generator, name, location, owner and commissioning date).

Submissions may be forwarded to the Program Manager via fax, email or post.

It is important that all information provided in an application is correct and not misleading. The Program Manager is within its rights to withdraw approval of any generators, which are subsequently found to have environmental concerns that were not advised at the time of application. Proponents who disagree with a decision of the Program Manager may appeal against the decision to the NGPSG. A decision of the NGPSG is final and cannot be contested.

2. Statement of Environmental Effects or Environmental Impact Statement

A full, independent Statement of Environmental Effects, Environmental Impact Statement (or similar) should address key environmental issues including potential impacts of the project and proposed mitigation, and how the project fits in with the principles of Ecological Sustainable Development³ (ESD). In summary, these principles would include: -

- The precautionary principle** namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.
- Inter-generational equity** namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.
- Conservation of biological diversity and ecological integrity** namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration.
- Improved valuation, pricing and incentive mechanisms** namely, those environmental factors should be included in the valuation of assets and services.

Key environmental considerations for a generator can be broadly categorised into the following:

- Global warming
- Impact on natural and cultural heritage
- Land use
- Transport use and impacts
- Project impact on the host industry
- Impact on flora and fauna
- Water, soil and air quality
- Visual & noise impacts
- Use and disposal of waste or by-products

² Auxiliary loads and electric parasitics associated with the process of electricity generation are netted out of the total output for determining eligible 'green' generation, unless they are considered to be insignificant (i.e. less than 1 per cent). The generator owners will need to provide verification of the magnitude of these losses.

³ Refer to the Commonwealth Environment Protection and Biodiversity Conservation Act, 1999.

Potential impacts can differ for each generation project type and are often site-specific. Issues to consider are detailed below in Table 1 and while not comprehensive, provide a guide to address the key environmental and community concerns for each generation type.

Applicants will need to provide evidence of community and local stakeholder consultation and support for each project (e.g. local residents, interest groups, environmental advocacy groups).

Where possible, supporting documentation (e.g. development approvals) should also be submitted with the application.

Where an Environmental Impact Statement or Environmental Impact Assessment has been undertaken for the project as required by relevant planning legislation, the Program Manager will accept a copy as appropriate documentation, provided they contain all required details.

Table 1 – Key ESD Considerations

Generator Type	Key ESD Considerations
<p><u>SOLAR</u> Solar Farm</p>	<p>Potential land-use impacts – interference with cultural heritage, archaeological sites, recreational use.</p> <p>Biodiversity impacts – vegetation clearance, loss of wildlife habitat.</p> <p>Visual impacts.</p> <p>Plans for decommissioning stage e.g. rehabilitation of site to its original state, disposal/reuse of materials.</p>
<p><u>WIND FARM</u></p>	<p>Noise, and visual amenity – assessment of impacts and minimisation efforts for local residents (e.g. proximity to domestic dwellings).</p> <p>Potential land-use impacts – interference with cultural heritage and archaeological sites, high conservation value area, recreational use.</p> <p>Biodiversity impacts – vegetation clearance, loss of wildlife habitat, interference with bird migratory routes.</p> <p>Eco-tourism considerations – increased traffic issues, road access, visitor facilities and parking etc.</p> <p>Plans for decommissioning stage – rehabilitation of site to its original state, disposal/reuse of turbines and blades.</p>
<p><u>HYDRO</u></p>	<p>Locational considerations including cultural, wilderness, scientific, recreational and conservation values.</p> <p>Construction impacts e.g. noise and dust, downstream nutrient and sediment effects, barriers to fish migration, disturbance to breeding habitat for birds and fish.</p> <p>Biodiversity impacts – changes to terrestrial/riverine habitats, soil erosion, effects on migratory fish species, reductions in in-stream fisheries (fish barrier).</p> <p>Changes to water quality and groundwater recharge e.g. nutrient concentration levels, O₂ concentrations, temperature, and pH.</p> <p>Transmission lines and road access considerations e.g. visual intrusion, habitat fragmentation, and disturbance of historical sites, land-use changes.</p> <p>Consideration of mitigation measures or offset, restorative and compensatory opportunities to address potential adverse affects outlined above (contamination and physical, ecological etc.)</p> <p>Management measures for adequate environmental flows.</p> <p>Impact of variations in downstream water flows.</p> <p>Plans for decommissioning stage e.g. rehabilitation of site to its original state, disposal/reuse of materials.</p> <p>Approved water management plan for the sustainable management of the hydro catchment (where applicable).</p>
<p><u>BIOMASS</u> General <i>These issues should be considered for all types of</i></p>	<p>Compliance of generator with relevant 'best-practice' environmental pollution requirements (i.e. noise, air emissions) e.g. EPA requirements.</p> <p>Air quality impacts/improvements – assessment of air emissions levels (e.g. NO_x, SO_x, dioxins, particulates, ash).</p>

Generator Type	Key ESD Considerations
<p><i>biomass (below).</i></p> <p><u>Biomass (cont.)</u></p>	<p>Water quality impacts – surface and groundwater pollution. On-going monitoring and treatment/control measures proposed.</p> <p>Use or disposal of by-products (e.g. ash recycling, landfilling).</p> <p>Diversion of material from other disposal mechanisms e.g. pit-burning, landfill.</p> <p>Noise, visual amenity, odour and health impacts during construction and operational stages.</p> <p>Effect on existing industries or activities (e.g. will the project support marginal activity or encourage expansion?).</p> <p>Transmission lines and road access considerations e.g. visual intrusion, habitat fragmentation, and disturbance of historical sites, land-use changes.</p> <p>Consideration of production of biomass in a landscape context, with farm management practices linked to regional targets for sustainable environmental and natural resource management.</p> <p>Fuel transport - energy used and distance travelled to site.</p> <p>Plans for decommissioning stage e.g. rehabilitation of site to its original state, disposal/reuse of materials. Appropriate and transparent community consultation process from siting stage throughout project development.</p>
<p>Landfill Gas</p>	<p>On-going monitoring and treatment/control measures proposed e.g. cleaning of landfill gas prior to burning, scrubbers, and catalytic converters.</p> <p>Land-use impacts – potential interference of gas extraction with landfill site rehabilitation and intended use.</p>
<p>Municipal Solid and Green Wastes</p>	<p>Application of the Waste Management Hierarchy</p> <p>Diversion from existing use and consideration of alternative uses, avoidance/reuse/reprocess mechanisms (e.g. composting, horticultural)</p> <p>Diversion from other disposal mechanisms e.g. pit-burning, landfill</p> <p>Quantity of non-renewable materials converted to energy (e.g. plastics).</p>
<p>Wood Wastes</p>	<p>Compliance of fuel source with GreenPower wood waste requirements and guidelines, and ability to meet verification conditions (Appendix A).</p> <p>Diversion from existing use and consideration of alternative uses, avoidance/reuse/reprocess mechanisms (e.g. composting, horticultural)</p> <p>Influences of generation project on future operational viability of agricultural site (i.e. host industry).</p>
<p>Agricultural Wastes</p>	<p>Influences of generation project on future operational viability of agricultural site (i.e. host industry).</p> <p>Diversion from existing residue utilisation (e.g. field retention, composting, stockfeed, animal bedding).</p> <p>Impact of storage.</p>
<p>Wet Wastes</p>	<p>Use or disposal of post-digested waste (e.g. fertiliser).</p> <p>Impact of transport and storage of pre- or post-digested wastes (e.g. odour).</p> <p>Avoidance of toxic and noxious emissions.</p>
<p>Energy Crops</p>	<p>Sustainability of agricultural practices (e.g. use of fertiliser, irrigation, herbicides, pesticides).</p> <p>Biodiversity impacts - vegetation clearance, loss of wildlife habitat.</p> <p>Salination and nutrient cycling considerations.</p> <p>Additional uses and benefits of product produced.</p>

The Program Manager will provide examples of the above criteria upon request.

3. Generator Fees

As from 1 January 2003 a generator assessment fee applies to all GreenPower accreditation applications for projects greater than 1MW. An annual accreditation fee was applied to all New GreenPower Generators ($\geq 1\text{MW}$) from 1 January 2004.

The fee structure is detailed in the following table.

Type	Description	Fee
Generator Assessment Fees		
Small Projects	Small scale projects, less than 1MW. For example, domestic solar installations and Solar in Schools projects.	No charge
Pre-approval Assessment of projects (or upgrades)	The generator is seeking board approval (either own or GreenPower Provider) for a development or upgrade and GreenPower pre-approval will add weight to the proposal; A submission has been received prior to development permits being granted, or to community consultation having been undertaken. In these situations, a pre-approval may be granted.	\$500 (non-refundable)
Projects (or upgrades) greater than or equal to 1MW	Full GreenPower approval process, including stakeholder consultation.	\$1000* *\$500 if pre-approved (i.e. Total: \$1000)
Annual Accreditation Fees for GreenPower Generators (applicable from 1 January 2007)		
Applicable only to projects greater than or equal to 1 MW	Maintain accreditation and benefits thereof, including use of GreenPower Generator Logo; administration of ongoing generator concerns/appeals etc	\$1000 per year

Generator Assessment Fees are applied to both successful and unsuccessful applications. All applicants will be invoiced the associated fee on completion of the assessment process.

A maximum of \$4,000 per annum is charged to owners of multiple GreenPower Generators as an annual accreditation fee.

The annual accreditation fee must be settled by the GreenPower Generator owner on an annual basis.

The Program Manager reserves the right to change Annual Accreditation and Generator Assessment Fees without notice.

Appendix C: Special Waiver Process

The Special Waiver application process, under Section 2.2.4 of the Program Rules, involves four major steps:

1. Special Waiver applications should be submitted to the GreenPower Program Manager, Industry and Investment NSW, GPO Box 3889 Sydney NSW 2001. Special Waiver applications relating to Section 3: GreenPower Product Technical Criteria should be submitted to the NGPSG by 31 January 2011.
2. The Program Manager will assess the Special Waiver application within one month of receiving it. If necessary further information will be requested from the proponent.
3. Complete applications are forwarded to the NGPSG for their decision. In reaching a decision the NGPSG may need to request further information from the proponent. The NGPSG decision will be made by 31 May 2011.
4. If the NGPSG decision is in the affirmative final approval will be granted by the Program Manager, Industry and Investment NSW within one month of the NGPSG decision being made.

Appendix D: Definition of Terms

Accreditation Criteria	The criteria for GreenPower Products as detailed in Section 3, 4 and 5 of this document.
Program Rules	This document and its appendices as may be amended from time to time.
GreenPower Customer	A domestic or commercial entity for which the GreenPower Provider has established a contract for the provision of a GreenPower Product. In the event that several contracts have been established for a single agency or commercial entity (e.g. for separate retail outlets or government agency departments) then each contract should be considered a separate customer.
Force Majeure	In relation to a party, means any cause outside the affected party's control including, but not limited to, an act of God, fire, lightning, explosion, flood, subsistence, insurrection or civil disorder, war or military operation, sabotage, vandalism, embargo, government action, or compliance in good faith with any law, regulation or direction by any Federal, State or Local Government or authorities, any network failure, or any failure on the part of the Network Operator or a generator, industrial disputes of any kind.
Gasification	The efficient conversion of solid fuel to gaseous fuel. The gas made can produce heat and electricity using gas engine generators.
GreenPower Designated Account	A separate 'account' created by a GreenPower Provider on the LGC Registry website for the purpose of surrendering LGCs which have been transferred into this account for compliance with the Accreditation Criteria.
GreenPower Generation	Electricity generated by a GreenPower Generator.
GreenPower Generator	For the purposes of this Program, a GreenPower Generator is defined as an electricity generator approved by the Program Manager that results in greenhouse gas emission reduction (within the electricity sector) and Net environmental benefits, and is based primarily on a Renewable Energy resource.
GreenPower Generator Eligibility Requirements	The requirements to which generators must comply in order to gain and maintain GreenPower Generator approval, as detailed in Section 5 and Appendix A and B of this document.
GreenPower Product	Any product or service that enables customers to voluntarily contribute financially to Renewable Energy generation from GreenPower Generators, and has been accredited under the National GreenPower Accreditation Program.
GreenPower Provider	Any person or organisation that operates a GreenPower Product.
GreenPower Right	A right to claim any eligible GreenPower generation (or a portion of generation) from a GreenPower Generator that may be bought by or transferred to a GreenPower Provider for use in respect of a GreenPower Product.
Incineration	The burning of solid or liquid residues or wastes to produce heat and electricity using steam turbine generators.
Industrial/Commercial/Municipal Solid Wastes	Mixed waste stream sourced from domestic garbage collections and council operations (e.g. sweeping and litter bins), commercial and industrial collections, which can include food waste, organic matter, plastics, paper and other materials.
Large-scale Generation Certificates	Large-scale generation certificates (LGCs) are an electronic form of currency created on the LGC Registry by eligible parties. A LGC is equivalent to 1 MWh of renewable electricity generated above the power station baseline
Large-scale Renewable Energy Target	The Large-scale Renewable Energy Target (LRET), covering large-scale renewable energy projects is a subset of the RET which will deliver 41,000 GWh by 2020 and continuing out to 2030.
Municipal Green Waste	Trimmings, prunings and clippings from domestic and council vegetation management and gardening activities including grass, leaves, mulch, branches/twigs, tree boles, stumps and loppings.

National GreenPower Accreditation Program	The framework established for GreenPower Products, as described in this document.
Net Environmental Benefit	The environmental benefits associated with a project outweigh the adverse environmental impacts. Impacts are considered within an Ecologically Sustainable Development (ESD) framework and include: greenhouse gas reduction; water and air quality; land use; impact on flora and fauna; impact on cultural/natural heritage; visual and noise impacts; use and disposal of waste products; transport etc.
Product Development Plan	GreenPower Providers will need to provide a Product Development Plan in any product application for GreenPower accreditation. This includes details of GreenPower Generators to be used in the proposed GreenPower Product, including description, type of unit, location, ownership details and capacity (where known). Where details of a specific generator have not yet been identified, the plan would include a general description of the development direction of the product.
Program Manager	The Program Manager nominated by the NGPSG, the contact details for whom are set out after the contents pages of these Program Rules.
Pyrolysis	The production of a carbon rich solid fuel and a hydrocarbon rich gas by heating a biomass feedstock in the absence of oxygen.
Renewable Energy	Energy which is naturally occurring and which is theoretically inexhaustible, such as energy from the sun or the wind, and which by definition excludes energy derived from fossil fuels or nuclear fuels. (<i>Source: The Macquarie Concise Dictionary</i>)
Renewable Energy Target	The Renewable Energy Target (RET) scheme has been established to encourage additional generation of electricity from renewable energy sources to meet the Government's commitment to achieving a 20% share of renewables in Australia's electricity supply in 2020. The RET legislation places a legal liability on wholesale purchasers of electricity to proportionally contribute to an additional 45,000 gigawatt hours (GWh) of renewable energy per year by 2020.
Settlement Period	1 January through to 31 December each year unless otherwise agreed with the Program Manager.
Sustainably harvested	Harvesting operations undertaken in a manner as to maintain the area's ecological viability and productive capacity*, and minimise any adverse environmental impacts in accordance with the principles of ecologically sustainable development e.g. to prevent soil erosion and contamination, protect water resources, provide for biodiversity conservation and protect culturally significant sites and threatened species habitat. Operations are approved under, or comply with, relevant Commonwealth, State or Territory planning and assessment processes. *Where applicable i.e. for agriculture, plantation forests, energy crops.
Waste Management Hierarchy	A system of prioritising ecologically sustainable waste solutions, based on the maximum conservation of resources (listed in order of preference): <ol style="list-style-type: none"> 1. Cleaner production 2. Waste avoidance 3. Waste minimisation 4. Re-use or recycle 5. Waste to energy 6. Landfill

Appendix E: National GreenPower Steering Group Charter

The National GreenPower Accreditation Program in Australia is governed by a national body known as the National GreenPower Steering Group (NGPSG). The NGPSG is responsible for the overall management of the affairs of the Program.

Representatives

The NGPSG is comprised of representatives from participating state government agencies in the ACT, NSW, Queensland, South Australia, Victoria and Western Australia, in correspondence with non-financial member organisations in Tasmania, Northern Territory and the Commonwealth. Agencies include:

- Department of Environment, Climate Change, Energy and Water ACT
- Industry and Investment NSW NSW
- Office of Clean Energy Queensland
- Department of Transport, Energy and Infrastructure South Australia
- Sustainability Victoria Victoria
- Office of Energy Western Australia
- Department of Climate Change and Energy Efficiency Commonwealth
- Department of Infrastructure, Energy and Resources Tasmania
- Department of the Chief Minister Northern Territory

Mission

Delivering effective strategic management of the National GreenPower Accreditation Program through widespread collaboration with all relevant stakeholders on accreditation and policy issues to guarantee program integrity, consistency and credibility.

The Role of the NGPSG

- To facilitate the operation of the National GreenPower Accreditation Program in keeping with its aim to drive investment in the Renewable Energy industry in Australia;
- To ensure the rules of the program evolve and develop over time to maintain the program's relevance according to the changing market environment, consumer behaviour and industry conditions;
- Address and resolve strategic and policy issues as they arise;
- To ensure that the accreditation and verification of GreenPower Products and GreenPower Generators is handled in a credible, timely and effective manner;
- To determine and implement modifications to the GreenPower Logos;
- To determine the removal of accreditation of GreenPower Products;
- To resolve any disputes that arise through the appeal process;
- To agree the annual program budget and to review the appointment of the Program Manager at the end of each three year term; and
- To carry out any other such activities as are necessary for the successful operation of the National GreenPower Accreditation Program.

In each state, NGPSG participants are responsible for building relationships with local GreenPower Providers and other stakeholders, and providing support for any general policy and generator accreditation issues. Specifically, each participant agrees to:

- Help to undertake marketing activities;
- Liaise with stakeholders to identify and address local issues associated with particular generators, generator proposals, or GreenPower Products; and with the press on local issues;
- Advise the Program Manager of specific or potential local issues arising which may have an impact on the National GreenPower Accreditation Program; and

- Inform relevant local community and industry members via the GreenPower progress reports (quarterly and annual) and other related materials.

These agencies may also co-ordinate information and education activities within their jurisdiction to support the efforts of GreenPower Providers. Such campaigns may include advertising, joint promotional events, seminars or provision of information in hard copy or on-line.

The NGPSG encourages all stakeholders to participate in the growth and evolution of the National GreenPower Accreditation Program.

Role of the Program Manager - Accreditation

Day-to-day management of the Program rests with the Program Manager, currently the Industry and Investment NSW (IIN). In brief, IIN is responsible for:

- initial and ongoing accreditation of GreenPower Products and GreenPower Generators;
- reporting – quarterly and annual audits;
- provision of information to participating agencies, GreenPower Providers, GreenPower Generators, potential and actual GreenPower Customers and consumer groups;
- coordinating consultation and central contact point for stakeholders (i.e. environmental and consumer organisations, GreenPower Providers and GreenPower Generators) with regard to changes to the program or issues as they arise; and
- other projects and activities as they arise.

Role of the Program Manager - Marketing

- development of marketing guidelines;
- processing licence applications to use the GreenPower Customer logo;
- maintaining the national website at www.greenpower.gov.au; and
- other projects and activities as they arise.

Further information

The NGPSG meets at least twice a year, and new representatives may join as the National GreenPower Accreditation Program expands into new states or regions.

For contact details of the NGPSG, visit www.greenpower.gov.au.