



14 September 2022

GreenPower
NSW Office of Energy and Climate Change
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Parramatta, NSW 2124

Sent to: greenpower.admin@planning.nsw.gov.au

GREENPOWER PROGRAM REVIEW 2022

Alinta Energy appreciates the opportunity to provide feedback on *GreenPower's Program Review 2022 – Consultation paper*.

Alinta Energy is a strong supporter of GreenPower, considering that it provides a high quality, trusted and transparent product in a market that can be difficult for organisations to navigate.

Alinta Energy provides the following responses to the paper's questions and proposals.

Recognising the RET and updating the minimum product

Alinta Energy supports the proposal to recognise the RET in GreenPower products to align with NGERs and Climate Active's new standards as well as international guidelines such as for the Science-Based Target initiative and RE100.

Alinta Energy supports option A¹ as a short-term solution but suggests that GreenPower consider increasing the minimum product to 100% as the increasing RPP decreases the contribution of the proposed 50% minimum product and undermines its relevance. Retaining products with different accounting methods may also make it difficult for customers to discern the value and integrity of the different options.

Promotional partnerships and marketing to increase awareness and grow demand

Alinta Energy supports increasing program fees to increase marketing and promotional activities, and to secure promotional partnerships.

Expanding GreenPower products to incorporate alternative fuels and a 24/7 product

Alinta Energy does not support creating products for alternative fuels, nor a 24/7 product.

Alinta Energy considers that adding different products for alternative fuels may increase complexity for potentially negligible benefit, noting that it would be difficult to equate each product to relative emissions reduction benefits, and there are already products to offset these emissions. Adding more may unnecessarily complicate decisions for organisations and public perceptions.

¹ Option A is to introduce a new 100% product that includes the RET, but to retain all other products, excluding the RET.

Alinta Energy suggests that a 24/7 product would also be complex to create and accredit, considering the difficulty in determining and guaranteeing the providence of energy for each interval. Alinta Energy also questions whether these products would deliver an emissions reduction or additionality benefit compared to traditional GreenPower products.

Thank you for your consideration of Alinta Energy's submission. Should you wish to discuss this further, please contact me at Oscar.carlberg@alintaenergy.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Oscar Carlberg', written in a cursive style.

Oscar Carlberg
Wholesale Regulation Manager
Alinta Energy