	Fields coloured in dark blue were not answered by respondend
	Energy Australia
1. Do you agree with the above market changes being the main drivers impacting GreenPower sales, public perception and its future role?	
1a. Please explain why.	No specific comment.
1b. Are there any other key drivers not included here?	
1c. If yes, please list.	
2.Should a vintage requirement for GreenPower certificates be introduced?	Yes
2a. Please explain why.	EnergyAustralia supports the proposal to introduce a 36-month eligibility vintage requirement for LGCs used for GreenPower.
2b. What should the validity period be for a vintage requirement for GreenPower certificates?	
3. Do you agree with GreenPower aligning its generator accreditation dates with the CER accreditation date?	Yes
4. Does Option A sufficiently address the demand from stakeholders to recognise the RET for 100% renewable electricity claims?	No

4a. Please explain why.	EnergyAustralia recommends the preservation of existing settings, which require GreenPower purchases to be additional to the Renewable Power Percentage (RPP) mandated under the RET. This might seem counterintuitive but reflects our desire to communicate factually with our customers about what their GreenPower purchases achieve. GreenPower is fundamentally about the customer interface through which green electricity is purchased. When customers pay for GreenPower, they expect to get something that is more than what retailers are already mandated to provide. Electricity retailers provide product descriptions through marketing materials and other communications, describing GreenPower as promoting investment in renewable electricity, and implying that it achieves something that would not otherwise have been achieved. By blending in the mandated volume, the message becomes that the customerâ€™s funds sometimes contribute to renewable output and sometimes donâ€™t â€“ an impossible line to communicate, and one that many customers may not agree to. Particularly for household and smaller customers, it is important that this message remains clear, and that GreenPower-accredited energy spend remains additional to the mandatory volume. For larger, more sophisticated buyers, the additionality rule can be applied by the retailer confirming the RPP procured for their load, and providing a share of GreenPower, around 82%, that takes the total to 100%. This composite GreenPower + RPP approach for 100% renewable electricity for larger businesses is preferable to diluting the offering and narrative for smaller customers by conflating the two schemes. If the Department pursues a change to incorporate the RPP into 100% GreenPower, irrespective of the issues highlighted above with clean messaging, then Option A might be less problematic than Option B.
5. 5What are the advantages of Option B?	EnergyAustralia counsels against the approach proposed under Option B.
5a. Would fixing the recognised RET percentage be a good solution to deal with the annual changes to the RPP?	No
5b. Please explain why.	
6.The proposal is a solution that can be quickly implemented. Should GreenPower consider a different approach in its long-term program design?	
6a. Please explain why.	No specific comment.
7. Which minimum percentage do you think is the most appropriate if Option B noted in 4.3.2 is chosen?	

7a. Please explain why.	EnergyAustralia calls for an outcome that provides for maximum customer participation and growth in literacy. A forced minimum share of renewable electricity will work against affordability and participation. Rather, we suggest that no minimum product percentage be set. At this time, many energy users are experiencing high bill costs and the wider effects of inflation. We suggest that GreenPower should retain flexibility in the percentage of accredited electricity permitted under the scheme and suggest that customers will pay for and access as much renewable electricity as they can feasibly afford. The Department should consider also the unnecessary costs that a change in the product percentage would trigger, with retailers needing to update complex billing systems, notify and migrate customers on lower plans, and refresh all associated marketing and materials.
8.Should GreenPowerâ€™s mission expand to include all forms of renewable energy, for example hydrogen?	No
8a. Please explain why.	It is critical that integrity not be sacrificed, and that clean energy must represent a genuine solution that is capable of progressively reaching zero emissions. Gas blending to replace the use of piped natural gas, whether biomethane or green hydrogen, does not meet this requirement because it necessarily involves blending with fossil gas and the continuation of greenhouse gas emissions. Some industrial uses for gas, including high-heat processing, will continue to rely on gaseous fuel for the foreseeable future. Steps can be taken case by case to support biogas and hydrogen blending within the technical limits of industrial equipment and processes. While these steps are beneficial, and represent the most responsible response, they are not equivalent to clean and fully carbon neutral electricity: Existing biomethane sources are limited, production of new biogas is not guaranteed as sustainable. Hydrogen blending is only currently tested to ~10%1 in the reticulated network. Even with 20% hydrogen blending, the associated emissions reduction would be capped around 7%, because of its lower energy content, before adding emissions associated with hydrogenâ€™s higher propensity to leak from networks and hydrogenâ€™s greenhouse gas Global Warming Potential, estimated at 33 over a 20-year period. Households and commercial sites are best positioned to move towards zero emissions through progressive electrification, with readily available and high-efficiency appliances, including heat-pump hot water units and reverse-cycle air conditioners. Blending hydrogen at any greater share thanâ€¯~10-20%â€¯is understood to requireâ€¯simultaneousâ€¯appliance replacement andâ€¯the extensiveâ€¯upgrade of both network and domestic pipework necessary to prevent embrittlement. Pursuit of hydrogen blending for use in the home, and similarly in many commercial business applications, ultimately comes at a high price with limited gains in emissions reduction. Further, consideration of a â€˜clean gasâ€™ or â€˜green hydrogenâ€™ accreditation would seem to be in direct competition with the Clean Energy Regulatorâ€™s Guarantee of Origin development work which would cause undue confusion among buyers of green hydrogen for appropriate industrial usage, including EnergyAustralia.
8b. Is the role of GreenPower the same across different energy carriers?	
8c. Please explain why.	No specific comment.
9.Is there anything else that you think should be part of GreenPowerâ€™s mission statement?	Yes

9a. If yes, please list.	EnergyAustralia suggests that an expansion of the definition to encompass all forms of energy, rather than an explicit objective to drive investment in electricity in Australia, is too broad. We endorse the sub-objective of â€œdecreasing greenhouse gas emissions from energy useâ€ but suggest that a more specific focus on growing renewable electricity and complementary investment is a more appropriate focus for other parts of the statement. The focus on emissions is appropriate to minimise the diversion of investment into fuels and pathways that donâ€™t have a credible, cost-efficient pathway to majority zero emissions. Again, in the last sentence, the focus should be returned to ensuring consumer confidence in environmentally sound renewable electricity products rather than providing for energy from other fuels. This is discussed further in our response to Question 8. The inclusion of a reduction in emissions associated with â€œenergy useâ€ is an important expansion of the scope and interests of the GreenPower scheme, as it naturally creates space for consideration of appropriate electrification, energy efficiency, demand response and emissions reduction from driving more renewable electricity into more hours of the day through storage.
10. Please give each of the below items a score between 1 and 5 for how important it should be for the development of the programâ€™s mission and objectives, 5 being of the highest importance. You can give the same score to several items. **- Increase awareness and demand for voluntary renewable energy products**	
10. - Decrease nationwide greenhouse gas emissions from energy use	
10. - Support new voluntary markets for emerging renewable energy and fuel types	
10. - GreenPower products should be 100% renewable	
10. - GreenPower products should lead to new and additional renewable energy projects being built and dispatched	
10. - GreenPower products should be transparent, independently audited and assured	
10. - GreenPower products should be affordable	
10. - GreenPower products should be aligned with best practice carbon accounting frameworks	

10. - GreenPower products should enable consumers to reduce and avoid energy-related emissions	
10. - GreenPower products should support best practice in renewable energy development to improve environmental, social and economic outcomes in their host communities	
10. - Advocate for consistent and best practice renewable energy and carbon accounting	
10. - Advocate for best practice energy product marketing to enable informed decision making by consumers	
12. Should GreenPower focus on maximum additionality, electricity carbon accounting, or should both types of products be supported?	Both types of products should be supported
13.Should a vintage requirement for GreenPower certificates be considered in the long-term design of GreenPower?	Yes
13a. Please explain why.	
14. Should GreenPower consider a generator age limit approach?	
14a. Please explain why.	No specific comment.
15.Should GreenPower restrict participating generators to new projects only?	
15a. Please explain why.	No specific comment.
16.How well would this option deliver on the GreenPower mission and objectives?	
16a. Does this differ for households, small and large businesses?	
16b. Please explain why.	
17.Which organisations would be most suited to partner with GreenPower to drive awareness and uptake of GreenPower, and why?	

18.Would you support GreenPower increasing program fees so that the program manager can increase its marketing and promotional activities?	
19. Should retailers be blocked from joining GreenPower if they sell green products that are not linked to renewable energy generation?	
20.What other changes to the program could provide the same level of clarity for consumers?	
21. Should GreenPower set strict requirements for how providers promote GreenPower and onboard GreenPower customers, i.e. how easy it is to get GreenPower?	
22. Are there any other customer segments that are unable to access GreenPower?	
24.Should GreenPower reduce its accreditation requirements, or make them stricter?	
24a. what do you think is the benefit of either approach?	EnergyAustralia suggests that no additional project assessment is required in the context of the Clean Energy Councilâ€™s Best Practice Charter and other State-Government led requirements of new developments.
25.What are the most important aspects that GreenPower should consider in its generator assessment?	
26. Do you see value in an official environmental rating for electricity retailers, and in GreenPower developing this rating?	
27. How could this be made administratively efficient and commercially attractive for retailers that perform well environmentally?	
30. How important is 24/7 renewable electricity coverage to businesses in Australia?	Very important