

Fields coloured in dark blue were not answered by respondent

Enosi Australia	
1. Do you agree with the above market changes being the main drivers impacting GreenPower sales, public perception and its future role?	Yes
1a. Please explain why.	
1b. Are there any other key drivers not included here?	Yes
1c. If yes, please list.	<p>This section clearly missed the trend towards 24/7 Carbon Free Energy and no greenwashing, and fails to recognise the opportunity for a fresh start by GreenPower that utilises modern technology.</p> <p>At COP26 in September 2021, global energy leaders launched the 24/7 Carbon-Free Energy Compact in partnership with UN-Energy and Sustainable Energy for All. And in December 2021 President Biden signed an Executive Order requiring that all US federal buildings be powered by renewable energy on a 24/7 basis by 2035. Global leaders, such as Google and Microsoft, and the US Federal Government, lead the “true zero” movement in 24/7 carbon-free electricity (CFE) procurement by matching their hourly power consumption with clean energy as close as possible.</p> <p>The Compact signatories pledge to use 24/7 carbon-free energy to decarbonise their electricity consumption completely. At that the heart of this is the use of new grid-scale traceability technologies that allows for time-matched and local 24/7 CFE procurement.</p> <p>Tracing technology also underpins another important move in the green hydrogen domain. If Australia is to achieve its ambitions as a “global green hydrogen powerhouse” then the product we put onto ships will need to meet the global standards. Both the UK and the European Commission have recently defined green hydrogen standards that will require 24/7 traceability of electrolyser power input from renewable sources. Meanwhile the Australian CER is still building a “guarantee of origin” pilot based on LGCs.</p> <p>Why is this higher standard being applied? It’s because current REC schemes are more and more being considered greenwashing themselves! Without time and location matching, paying money to take credit for energy that someone else actually used is the very definition of greenwashing in the public discourse. This does not diminish the original purpose of GreenPower as an incentive for new renewable generation investment, but today’s problem is not insufficient clean generation investment. The problem is in poorly aligned incentives for renewable resources that “fill the gaps”, operating when the sun isn’t shining or the wind blowing.</p> <p>Enosi proposes a fresh start and new robust role for GreenPower - as the certifier of the traceability technology and ensuring that no energy is being recognised twice. To do this, Enosi envisages GreenPower working closely with AEMO, to monitor and record time based contracts between participants via the AEMO (in a mechanism similar to the allocation process used to manage prudential collateral requirements). GreenPower could be operating the registry for such contracts. We refer to this as the 24/7 CFE Allocation Based Proposal. There would be no requirements for any form of certificates. When you use energy, you cannot wash your exposure. You or your retailer either deals directly with a contract renewable source on a time matched basis or you are drawing from the unallocated energy on the grid.</p>
2. Should a vintage requirement for GreenPower certificates be introduced?	Yes
2a. Please explain why.	Usage needs to be close to the time of production. Much closer than 36 months!
2b. What should the validity period be for a vintage requirement for GreenPower certificates?	Shorter

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.	<p>Definitely not. It is a ridiculous idea. As the consultation paper itself asserts, this perpetuates the error in GreenPower where 100% actually equals 118.6%. There should be one accurately accounted system, not multiple confusing options.</p> <p>Of course we also note that evidence of actual renewable energy supply matched in time to consumption on the same grid (rather than LGCs) is in fact the standard that will be demanded.</p>
5. What are the advantages of Option B?	It would be a partial improvement only. It's on the path towards recognising the actual match of renewable energy that has been purchased, but it is nowhere near sufficient. Below baseline renewable generation should also be ascribed "green" status, and contracts that show actual match to such generation should be certified.
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.	And a fixed percentage? Seriously, what's so hard about updating the RET percentage? We have these things called "computers".....
6. The proposal is a solution that can be quickly implemented. Should GreenPower consider a different approach in its long-term program design?	Yes

	<p>Absolutely Yes.</p> <p>GreenPower should be re-designing the program so it meets the highest global standards and solve for the following 6 issues that the use of an LCG-based system has caused.</p> <p>Separation of the energy from the renewable attribute: GreenPower and "certificate-only" PPAs means consumers can take (pay for) the credit for renewable energy that someone else actually bought.</p> <p>Location: Certificates can be purchased from generators on a completely different grid (eg WEM vs NEM).</p> <p>Time mismatch: You can buy certificates from a solar farm, use energy all night and still claim to be 100% renewable</p> <p>Below baseline ignored: REC schemes are designed to provide reward for additional renewable generation but ignoring renewable built before the scheme start date (eg Snowy and Tas Hydro assets) means they are not an accurate accounting of renewables on the grid.</p> <p>Poor incentive alignment: As renewable penetration increases, providing the same financial incentive for solar as for wind or hydro creates over investment in unneeded solar vs the required firm renewable assets.</p> <p>Consumers simply don't see why they should be paying more for renewable energy, when they are told that it is the lowest cost generation (hearing of negative prices for solar in the market etc.). Placing the cost burden on the clean energy is back-to-front. It is entirely feasible to propose that buyers use certificates to offset the energy that is not matched to a renewable source. Companies and individuals would then have incentive to reduce the volume that cost them more.</p> <p>Adoption of GreenPower is clearly hampered by lack of understanding and trust. The above issues are why GreenPower doesn't pass the pub-test.</p> <p>The solution for these issues is already exists</p> <p>Individual consumers with smart meters and the traceability technology have already been proven as viable for NEM wide adoption, as the metering stock rolls over.</p> <p>The use of an AEMO 24/7 CFE allocation process that brings the system into balance, prevents any double accounting</p> <p>To emphasize the importance of this shift in thinking we note that how governments, companies and communities procure and consume clean energy has the potential to transform and decarbonise Australia's NEM electricity grid.</p> <p>Within the next decade, net-zero targets will morph into "true zero" ambitions, with hourly matching of carbon-free energy production to real-time energy use allowing consumers to take real action towards eliminating (rather than offsetting) their Scope 2 carbon footprint.</p> <p>Shifting from 100 per cent annual matching to minimum hourly matching, where every hour of electricity consumption is matched to carbon-free energy, will provide the right demand signals for the required firming. Thus, hourly matching will drive faster full-scale decarbonisation of electricity grids.</p> <p>In short, clean energy consumers who accurately track and trace their power's source, price, availability and location will raise the bar to purchase 100% carbon-free energy around the clock. Plus, tangible insights from energy traceability will help guide and incentivise future renewable investments and establish a data-driven renewable energy market.</p> <p>GreenPower's long term design should address the urgent requirement for carbon accounting enhanced by energy traceability. By introducing a fully inclusive time-matched evidence based approach, GreenPower can accelerate our nation's progress to zero emissions in the truest way possible.</p>
6a. Please explain why.	30%
7. Which minimum percentage do you think is the most appropriate if Option B noted in 4.3.2 is chosen?	30%
7a. Please explain why.	We believe that only time-matched generation should be included, and therefore 30% is an appropriate starting point for most consumers - being roughly the match between fixed angle solar and a typical residential demand profile
8.Should GreenPower's mission expand to include all forms of renewable energy, for example hydrogen?	Yes
8a. Please explain why.	Clearly Australia will need certifiers for other forms of renewable energy. We are encouraged to know that the CER's GO program for green hydrogen has re-opened its consideration of time- and location matching in line with international standards. Australia can and should become an exporter of clean energy, including green hydrogen. To achieve this, Australian standards must align with UN 24/7 CFE and the standards required in US, Europe and UK
8b. Is the role of GreenPower the same across different energy carriers?	No
8c. Please explain why.	We are neutral as to whether the certifier should be GreenPower. Nevertheless it is critical that GreenPower should address all forms of zero emission electricity supply. Most consumers would be appalled to know that it doesn't.

9. Is there anything else that you think should be part of GreenPower's mission statement?	Yes
9a. If yes, please list.	Overseer of the most honest and credible renewable energy certifying system.
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 program'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	4
10. - Decrease nationwide greenhouse gas emissions from energy use	4
10. - Support new voluntary markets for emerging renewable energy and fuel types	2
10. - GreenPower products should be 100% renewable	5
10. - GreenPower products should lead to new and additional renewable energy projects being built and dispatched	3
10. - GreenPower products should be transparent, independently audited and assured	5
10. - GreenPower products should be affordable	4
10. - GreenPower products should be aligned with best practice carbon accounting frameworks	5
10. - GreenPower products should enable consumers to reduce and avoid energy-related emissions	5
10. - GreenPower products should support best practice in renewable energy development to improve environmental, social and economic outcomes in their host communities	5
10. - Advocate for consistent and best practice renewable energy and carbon accounting	5
10. - Advocate for best practice energy product marketing to enable informed decision making by consumers	5

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?	
13a. Please explain why.	Our view is that time-matched certificates don't suffer from the problems described (oversupply etc). The problem can be eliminated rather than "tweaked". Carbon Accounting should have a higher priority. Additionality is fine, but it needs to be targeted to the kind of resources actually required (ie baseload renewables, storage, diversity of supply etc). 24/7 carbon accounting is the means by which we can prioritise additionality, but it is dishonest to conflate an "additionality incentive plan" with carbon accounting (eg with respect to below baseline renewables).
14. Should GreenPower consider a generator age limit approach?	No
14a. Please explain why.	No. Such a solution drives GreenPower even further away from representing an honest accounting of emissions. Further, b By applying a generator age limit, you are directly undermining the development of longer term RE development and longer lasting storage solutions.
15. Should GreenPower restrict participating generators to new projects only?	No
15a. Please explain why.	No. This over-incentivises projects that might even replace existing renewable energy. Incentives should be designed for resources that best fill the gaps in the current renewable portfolio - aiming at 24/7 carbon free supply. To do that we need to measure and include all the existing renewable generation for both more accurate carbon accounting, and for better aligned incentives.
16. How well would this option deliver on the GreenPower mission and objectives?	Slightly well
16a. Does this differ for households, small and large businesses?	Yes
16b. Please explain why.	It would only encourage smaller consumers if retail suppliers were the ones writing the PPAs. That in turn depends on consumer demand, but such demand will be suppressed by the higher pricing associated with such a product (including the LGC cost). A time-based certification program including all generators avoids this issue entirely.
17. Which organisations would be most suited to partner with GreenPower to drive awareness and uptake of GreenPower, and why?	It's not in the interests of most retailers to promote GreenPower. Its complexity, lack of transparency and questionable model is a discouragement for residential, business or C&I consumers to buy it. Tweaking the model is not going to solve these concerns. The key partner of a well designed time-based certification program would be AEMO as the provider of core time-stamped production and contracted consumption data. With the right measurement system in place, retailers will take their natural role as promoters of energy products - including time-matched renewables. Each retail book would be subject to certification and such services open competition on the technology to do the traceability. GreenPower would accredit these certifiers and be paid accordingly for their service and accreditation on an end user pays basis..

18. Would you support GreenPower increasing program fees so that the program manager can increase its marketing and promotional activities?	Yes
19. Should retailers be blocked from joining GreenPower if they sell green products that are not linked to renewable energy generation?	No
20. What other changes to the program could provide the same level of clarity for consumers?	A simple fully transparent system, with easily audited function. Time and location matching becomes critical to the credibility of the program - otherwise it risks being seen as just another offset scheme. GreenPower focus needs to be on promoting one solution that sets the highest standard - and that standard needs to be centered on the removal of fossil fuels by the retailers, not incentivise offsets credits against existing fossil fuels. The design of the next generation program needs to be far better differentiated from "carbon credits". The current LGC-based system is already seen as an offset program itself, because of the lack of time and location matching.
21. Should GreenPower set strict requirements for how providers promote GreenPower and onboard GreenPower customers, i.e. how easy it is to get GreenPower?	Yes
22. Are there any other customer segments that are unable to access GreenPower?	Yes
24. Should GreenPower reduce its accreditation requirements, or make them stricter?	GreenPower should make its accreditation requirements stricter
24a. what do you think is the benefit of either approach?	Generator accreditation should be rigorous and comprehensive in any future scheme.
25. What are the most important aspects that GreenPower should consider in its generator assessment?	No use of fossil fuels. The emphasis needs to be on the removal of burning what nature has taken over 1 million years to produce.
26. Do you see value in an official environmental rating for electricity retailers, and in GreenPower developing this rating?	No
27. How could this be made administratively efficient and commercially attractive for retailers that perform well environmentally?	To explain our above No answer: The market does this without GreenPower. GreenPower just needs to set the standard and let others rank the retailers on their transparency and the ACCC to monitor what the retailers are claiming. Retailers should be given the flexibility to offer products they think fit the market - including GreenPower products. It is unfair to smear an entire retail customer base when the retailer does in fact offer authentic renewable products.
30. How important is 24/7 renewable electricity coverage to businesses in Australia?	Very important