

Fields coloured in orange were not answered by respondent

Sourced Energy	
Questions	Response
1.Do you agree with the definitions of biogas, biomethane, renewable hydrogen and other renewable gases outlined in the paper in Section?	Yes
If not, what should they be?	
2.Do you agree with an initial focus on biomethane and renewable hydrogen?	No
If not, why not?	We believe that there needs to be a critical mass of projects and see that limiting to these gases may prohibit a small number of other projects from participation. We think that as long as gas specifications can be met then other forms could be considered.
3.Should the pilot be open to other renewable gases?	Yes
If so, which and why?	Biogas assuming this is available in sufficient quantity and specification.
4.Do you agree with the eligibility criteria proposed in Section 4?	Yes
If not, why?	
5.Are there other eligibility criteria that should be included, and what would they achieve?	Potentially a behind the meter project or projects could be included ie without gas network connection to ascertain if behind the meter projects can work for renewable gas.
6.Which technologies and production processes should be included in the pilot?	BIO and anaerobic digestion. Renewable hydrogen.
7.What factors do you consider essential when defining best practice planning compliance and environmental management?	Minimisation of embedded and produced emissions throughout the production life cycle. No usage of native flora and fauna in feedstock.
8.Do you agree that only projects that displace network gas use should be eligible to participate in the pilot?	No
If not, why not?	Behind the meter gas could be considered as its measurement, specification and usage can be verified.
9.Should behind the meter production and use projects without a network connection be able to participate in the pilot, and why?	Yes as they offer the opportunity of more projects participating and potentially lower cost renewable gas.
10.If behind the meter projects without network connection were eligible, how could metering and other verification activities be done?	Sub network level metering would be required. Most consuming equipment will have a reliable consumption measure. Network displacement could also be measured where a network connection was otherwise being utilised. It should be possible to sample gas and check its adherence to standards if there are a limited number of projects permitted to participate.

11.Are there any barriers to injecting renewable gas into the network in your jurisdiction that GreenPower should be aware of for the pilot?	The biggest limitation and expense is complying with 0.2% oxygen content. We believe this standard is too rigorous and well above many other international markets for gas.
12.Do you agree with the proposed national network boundary approach allowing the sale of certificates across Australia?	Yes
If not, why?3	
13.Do you agree with the pilot aligning eligible feedstocks with the ERF methodology?	Yes
14.Should any other feedstocks be included? Which ones, and why?	
15.Do you see any risks of unintended consequences from incentivising anaerobic digestion of waste-derived feedstocks and landfill gas capture?	No
If so, which risks and are there any risk mitigation options?	
16.Should the use of energy crops be permitted?	No
Why or why not?	Not consistent with approach of pilot and GreenPower.
17.If energy crops were eligible, what conditions and considerations would ensure these projects still adhere to the principles of Ecological Sustainable Development?	No monoculture or first generation genetically modified crops. A short list of allowed second generation GMO crops could be developed.
18.Should methane produced using hydrogen methanation of the carbon dioxide in biogas be included?	If there are projects of this nature that are actually close to production or able to produce in the pilot timeframe in an appropriate quantity.
19.Do you agree that, for project assessment, the pilot should use the cradle to gate approach?	Yes
Why or why not?4	Yes but gate could be a different boundary if behind the meter.
20.Do you agree with the definition of the gate being the gas network injection point?	No
If not, why not and do you have a recommendation for what it should be instead?	This definitely excludes behind the meter if the injection point is "the gate" It could be another meter on site in the case of behind the meter.
21.Are there any other LCA standards or requirements other than those outlined in Section 5 that should be considered?	
22.Should there be different requirements for biomethane and hydrogen projects?	No
If so, what should they be?	

23. Do you agree that fugitive emissions from gas network pipelines are not considered in the projects LCA?	Yes
If not, how should fugitive emissions be treated?	
24. Do you agree that producers must offset any emissions before a certificate can be created?	Yes
If not, why?	
25. Should other carbon offsets other than ACCUs be permitted to offset upstream emissions?	In the pilot ACCUs would be a straightforward option. Potentially other units could be used beyond the pilot stage.
26. Do you agree that renewable gas no longer being available for its current use does not need to be assessed as part of a project's LCA?	Yes
If not, why?	
27. Are there any schemes other than the CER's ERF methodology, the Australian Government's hydrogen GO scheme, and the Smart Energy Council's Zero Carbon Certification Scheme with which the pilot may interact?	Not with major impact.
28. What linkages between these schemes and the pilot should be considered?	These have been covered above and in the Consultation Paper.
29. What recognition by existing schemes is needed for the pilot to provide value for customers?	As well as those mentioned perhaps some international schemes eg RE 100 although they should probably satisfy the Renewable Energy Certificate definitions.
30. What design elements of the pilot are most crucial for recognition by other programs and schemes?	Measurement and ability to displace network gas and offset emissions.
31. Do you agree with the proposed approaches in Section 7 for non-ERF and ERF projects?	Yes
If not, which step should be changed and why?	
32. Do you agree that any displacement ACCUs should be surrendered before an RGC is created?	Yes
If not, why not?	
33. Do you see any risks with the alternative approach of the displacement ACCU being surrendered at the same time as the RGC is surrendered?	No
34. Do you agree with the decoupled approach being applied for the pilot?	Yes
35. Please specify why you think one or the other is more suitable, and if any other options should be considered.	Decoupled works well for the LGC market and allows for retailer independence.

36.Do you agree with the proposed approach of using an existing registry for the pilot?	Yes
If not, why not?	
37.Is it important for customers to be able to access the registry and manage their own surrenders?	Yes
38.Is there a particular registry functionality other than those mentioned in Section 8 of the paper that you think should be included in the pilot, and why?	No
39.Do you agree with the proposed attributes listed in Section?	Yes