

Fields coloured in orange were not answered by respondent

World Kinect Energy Services	
Questions	Responses
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?	Yes
If not, why not?	
3.Should the pilot be open to other renewable gases?	Yes
If so, which and why?	Subject to level of commercial interest, but key focus should be biomethane and renewable hydrogen.
4.Do you agree with the eligibility criteria proposed in Section 4?	No
If not, why?	<p>Item a) should have the 2020 commencement requirement removed or extended earlier to increase availability of existing projects. Existing projects using biogas/biomethane for electricity generation may wish to pivot to produce renewable gas depending on market pricing and would increase renewable gas availability.</p> <p>Item f) - this could be extended to also allow voluntary LGC purchase/surrender, as an alternative to GreenPower purchases.</p> <p>Item g) Best practice compliance should also include minimal/no impact to end-user equipment.</p>
5.Are there other eligibility criteria that should be included, and what would they achieve?	
6.Which technologies and production processes should be included in the pilot?	
7.What factors do you consider essential when defining best practice planning compliance and environmental management?	Ensuring compliance with offsets of scope 1, 2 and 3 emissions is critical to drive the right message for the pilot.
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?	Projects that are behind the meter, but still provide renewable gas to a network-connected customer, should be eligible to participate - similar to existing rooftop solar projects still being viable for LGC/GreenPower certificate creation.
9.Should behind the meter production and use projects without a network connection be able to participate in the pilot, and why?	Yes, to support industries that are gas dependent roll-out renewable gas and reduce reliance on standard natural gas supply.
10.If behind the meter projects without network connection were eligible, how could metering and other verification activities be done?	Equivalent revenue grade gas metering could be utilised to verify gas quantities. Accreditation of these projects must be on a case-by-case basis to ensure gas usage is renewable.
11.Are there any barriers to injecting renewable gas into the network in your jurisdiction that GreenPower should be aware of for the pilot?	Quality of gas being injected to the network and the impact on end-user equipment.
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?	Yes
Why or why not?	These should be reviewed beyond the pilot.
17.If energy crops were eligible, what conditions and considerations would ensure these projects still adhere to the principles of Ecological Sustainable Development?	
18.Should methane produced using hydrogen methanation of the carbon dioxide in biogas be included?	Only if the hydrogen is produced from renewable energy.
19.Do you agree that, for project assessment, the pilot should use the cradle to gate approach?	Yes
Why or why not?4	

20. Do you agree with the definition of the gate being the gas network injection point?	Yes
If not, why not and do you have a recommendation for what it should be instead?	
21. Are there any other LCA standards or requirements other than those outlined in Section 5 that should be considered?	Recycling of the renewable gas should be considered, but may be better assessed following the pilot.
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?	No
If not, why?	The negligible threshold should be used, below which no ACCUs are required, but above which ACCUs must be purchased. Who is responsible to purchase ACCUs to be carbon neutral (producer/end user) should be reviewed as part of the trial - if delivered costs are not viable and flexible, the uptake in the pilot won't be as great.
25. Should other carbon offsets other than ACCUs be permitted to offset upstream emissions?	Carbon offsets should be from domestic projects, but other viable carbon offsets that meet this criteria should be permitted.
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?	No
If not, why?	Given this is a trial aimed to promote renewable gas and reduce emissions through more sustainable gas usage, it should also investigate the true emissions impact of gas no longer available for existing uses.
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?	No.
28. What linkages between these schemes and the pilot should be considered?	Existing proposed interaction is acceptable.
29. What recognition by existing schemes is needed for the pilot to provide value for customers?	RGCs would need to be provided to the customer as proof of purchase and claim (which RGCs retired to prevent double-counting).

30.What design elements of the pilot are most crucial for recognition by other programs and schemes?	Avoidance of double counting and double claiming, exclusive rights to RGCs.
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.	The decoupled approach is more consistent with existing renewable electricity methodologies, and would be more readily accepted.
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?	Ability to see proof of certificate retirement in the name of a particular end-user/claimant.
39.Do you agree with the proposed attributes listed in Section?	Yes