

## Response to GreenPower consultation questions FINAL 17032022

Evoenergy responses to the consultation questions are contained in the table below.

GreenPower Consultation question	Evoenergy response
<b>Which renewable gases will be included in the pilot?</b>	
1. Do you agree with the definitions outlined above? If not, what should they be?	Yes, Evoenergy are supportive of the definitions outlined in the document.
2. Do you agree with an initial focus on biomethane? If not, why not?	Yes, Evoenergy support the initial focus on biomethane.
3. Should the pilot be open to other renewable gases, if so, which and why?	Evoenergy would support the option for synthetic methane to be included in the pilot at some point. For example, carbon dioxide removed from biogas in biomethane upgrading is a resource that could be incorporated into a methanising process using renewable hydrogen.
<b>Producer eligibility criteria</b>	
4. Do you agree with the above eligibility criteria? If not, why?	<p>Evoenergy would like further clarification of criteria a) <i>must have commenced operation in 2020 or later</i>. For example, the Mugga Lane Landfill in the ACT commenced operation in the 1970s, gas recovery to electricity generation commenced in the 1990s. However, upgrading to biomethane and injection to the gas network will not commence until 2023 at the earliest.</p> <p>Evoenergy believe the Mugga Lane biomethane should be included in the pilot scheme and would like further clarification that it would meet this criteria.</p> <p>Evoenergy would like criteria and the requirement for a connection to a gas network or transmission pipeline, to be reconsidered. For example, an asphalt plant near Mugga Lane Landfill currently uses LPG/diesel for fuel. If this plant made a direct (behind the meter) connection to the landfill gas plant, it would displace the use of these other fossil fuels but they would not necessarily have a network connection. This should not delay the commencement of the pilot scheme but could be considered during the operation of the pilot scheme.</p>

GreenPower Consultation question	Evoenergy response
5. Are there other eligibility criteria that should be included, and what would they achieve?	At this point in time Evoenergy do not have a strong opinion on the requirement for other eligibility criteria.
6. Which technologies and production processes should be included in the pilot?	Evoenergy support the inclusion of the four biogas upgrading technologies mentioned in the consultation paper, plus hydrogen/CO2 methanation processes.
7. What factors do you consider essential when defining best practice planning compliance and environmental management?	Evoenergy is supportive of an “industry leading best practice” approach similar to LGCs. However we believe it should take into consideration local council, territory and state requirements. It may be impractical to force all participants to comply with another jurisdiction's requirements.
<b>Displacing network gas use as a requirement for the pilot</b>	
8. Do you agree that only projects that displace network gas use should be eligible to participate in the pilot? If not, why not?	Evoenergy is supportive of the pilot scheme being eligible for projects that displace network gas, however would like GreenPower to consider the possibility for industry using LPG/diesel fuels to replace this use with a direct connection to a biomethane project.  Note our response to question 4 regarding Criteria d).
9. Should behind the meter production and use projects without a network connection be able to participate in the pilot, and why?	Evoenergy would like the requirement for a connection to a gas network or transmission pipeline, to be reconsidered. For example, an asphalt plant near Mugga Lane Landfill currently uses LPG/diesel for fuel. If this plant made a direct (behind the meter) connection to the landfill gas plant, it would displace the use of these other fossil fuels but they would not necessarily have a network connection. This should not delay the commencement of the pilot scheme but could be considered during the operation of the pilot scheme.  Note our response to question 4 regarding Criteria d).
10. If behind the meter projects without network connection were eligible, how could metering and other verification activities be done?	If the entity using the gas is different to the producer, the gas consumption would likely be metered for commercial reasons and the meter could be independently verified if required.

GreenPower Consultation question	Evoenergy response
11. Are there any barriers to injecting renewable gas into the network in your jurisdiction that GreenPower should be aware of for the pilot?	<p>Evoenergy does not believe that there are any physical or operational barriers to gas injection in the network.</p> <p>The ACT Government have legislated net zero emissions targets (interim and by 2045) in place in the ACT jurisdiction. The <i>ACT Climate Change Strategy 2019-2025</i> and <i>ACT Labour and ACT Greens Parliamentary and Governing Agreement for the 10<sup>th</sup> Australian Capital Territory Legislative Assembly</i> outline goals and actions to reduce the emissions from gas, phasing out of fossil fuel gas in the ACT by 2045.</p>
<b>Network boundary</b>	
12. Do you agree with the proposed national network boundary approach and if not, why?	Evoenergy is supportive of a national network boundary approach and believe the network boundary should be consistent with how renewable electricity certificates (LGCs) are managed.
<b>Eligible feedstocks for biomethane</b>	
13. Do you agree with the pilot aligning eligible feedstocks with the ERF methodology?	<p>It is unclear if landfill gas recovery is considered an eligible feedstock in the consultation paper. Landfill gas recovery is mentioned on page 6 of the consultation paper, however it is not mention on page 10 in reference to the listed sources allowed under the ERF methodology.</p> <p>Evoenergy would strongly support the inclusion of landfill gas recovery in the pilot and believe it meets the criteria on page 10 of the consultation paper, being:</p> <ul style="list-style-type: none"> <li>• include a renewable energy input,</li> <li>• a requirement that the project must displace natural gas,</li> <li>• must have a net environmental benefit,</li> <li>• positive consumer perception and meet required local, state, and federal planning and regulatory approvals</li> </ul>
14. Should any other feedstocks be included? Which ones, and why?	It is not clear if landfill gas is included, if it is not included then Evoenergy believe landfill gas should be included as it meets the criteria on page 10 of the consultation paper.

GreenPower Consultation question	Evoenergy response
15. Do you see any risks of unintended consequences from incentivising anaerobic digestion of waste-derived feedstocks and landfill gas capture? If so, which risks and are there any risk mitigation options?	Landfill sites already exist and will emit gases. We see significant value in creating an incentive for these gases to be captured and used to displace fossil gas. Any concerns over the creation of an unintended incentive to generate more landfill waste can be managed through waste management practices and “leading industry best practices” as referred to in question 7.
16. Should the use of energy crops be permitted? Why or why not?	Evoenergy has not considered this topic in detail and at this point in time does not have a strong opinion.
17. If energy crops were eligible, what conditions and considerations would ensure these projects still adhere to the principles of Ecological Sustainable Development?	Evoenergy has not considered this topic in detail and at this point in time does not have a strong opinion.
18. Should methane produced using hydrogen methanation of the carbon dioxide in biogas be included?	Yes, this has the potential to create net-negative emissions.
<b>Project scope and life cycle analysis</b>	
19. Do you agree that, for project assessment, the pilot should use the cradle to gate approach? Why or why not?	Yes, Evoenergy broadly supports the cradle to gate approach and alignment with other certification schemes as emissions in transmission and distribution networks are already accounted for.
20. Do you agree with the definition of the gate being the gas network injection point? If not, why not?	Yes, the displacement of fossil gas and the fact emissions in transmission and distribution networks are already accounted for align with injection into the network being the correct point to define as the gate.
21. Are there any other LCA standards or requirements that should be considered?	At this point in time Evoenergy does not believe there are any further considerations needed.
22. Should there be different requirements for biomethane and hydrogen projects? If so, what should they be?	Consideration should be given to the effect on any other standards. As an example hydrogen injection has the potential to affect AS4564 Gas Quality requirements.

GreenPower Consultation question	Evoenergy response
<b>Fugitive emissions</b>	
23. Do you agree with this approach? If not, how should fugitive emissions be treated?	Evoenergy believe the proposed approach is consistent with the cradle to gate scope.
<b>Offsetting emissions</b>	
24. Do you agree with the proposed approach? If not, why?	Evoenergy is broadly supportive of the proposed approach.
25. Should other carbon offsets be permitted to offset upstream emissions?	See response to Q24.
<b>Baseline emissions</b>	
26. Do you agree with the proposed approach? If not, why?	Yes, Evoenergy is broadly supportive of the proposed approach and support the need for the administration of the scheme to be cost effective and easily understood.
<b>Interactions with other schemes</b>	
27. Are there any other new schemes not mentioned here that GreenPower should be aware of?	No response
28. What linkages between these schemes and the pilot should be considered?	No response
<b>Recognition of RGCs by existing schemes</b>	
29. What recognition is needed for the pilot to provide value for customers?	No response
30. What design elements of the pilot are most crucial for recognition by other programs and schemes?	No response
<b>Transaction steps for pilot certificates</b>	

GreenPower Consultation question	Evoenergy response
31. Do you agree with the proposed approaches for non-ERF and ERF projects? If not, which step should be changed and why?	No response
32. Do you agree that any displacement ACCUs should be surrendered before an RGC is created? If not, why not?	Yes, Evoenergy is broadly supportive of this approach.
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 response
<b>Other pilot design elements</b>	
34. Do you agree with the decoupled approach being applied for the pilot?	Yes, Evoenergy is broadly supportive of the approach.
35. Please specify why you think one or the other is more suitable, and if any other options should be considered.	Evoenergy believes the approach should be consistent with how renewable electricity certificates (LGCs) are managed.
<b>Registry functionality</b>	
36. Do you agree with the proposed approach of using an existing registry? If not, why not?	Yes, Evoenergy believe the most cost-effective approach should be employed.
37. Is it important for customers to be able to access the registry and manage their own surrenders?	No response
38. Is there a particular registry functionality you think should be included in the pilot, and why?	The LGC registry and functionality should be used as a guide.

GreenPower Consultation question	Evoenergy response
<b>Gas attributes captured in the registry certificates</b>	
39. Do you agree with the proposed attributes?	Yes, Evoenergy agrees with the attributes outlined in the consultation paper.
40. Are there any other attributes that should be included?	Is emissions intensity expressed in total amount of CO2eq?
<b>Functional unit of measurement</b>	
41. Do you agree with GJ as the functional unit? If not, why?	Evoenergy supports the use of GJ as the functional unit, noting that this may limit use for small users, however, using MJ as the functional unit may not be practical.
42. How important is it that the registry is based on GJ in addition to using this unit on the certificate?	Evoenergy believes the registry and certificates should be in the same units.
43. Should a certificate be issued for each 1 GJ of renewable gas produced, or should certificates be issued incrementally for any volume chosen by the producer?	Please refer to the response for Q41 above.
<b>Certificate period of validity</b>	
44. Do you agree with the proposed validity period? If not, why?	While Evoenergy is broadly supportive of the alignment with LGCs, we believe some consideration should be given to a longer validity period, say 5 years, for the initial phase of a new project to give more confidence that early production costs can be recovered, i.e. the project may proceed without locked in certificate buyers, knowing that the buyers could be engaged at a later date, within the validity period.
45. Are there other schemes or programs that the pilot should align with regarding the certificate validity period?	Evoenergy believe the proposed alignments are appropriate, noting the response to Q44, with respect to a longer validity period for RGcs to support and project's risk.
<b>Governance</b>	

GreenPower Consultation question	Evoenergy response
46. Which organisations should be represented on the project steering committee?	Evoenergy believe the participants proposed in the consultation paper are appropriate.
<b>Auditing</b>	
47. Do you agree with the proposed approach for auditing? If not, why not?	Evoenergy broadly support the proposed approach for auditing the scheme.
<b>Participation fees and certificate price</b>	
48. What price would you expect for a renewable gas certificate?	Evoenergy supports the market-based approach to allow consumers of gas to decide the value of renewable gas to the specific circumstances of the gas customer.
49. Do you agree with the proposed approach not to set price caps or minimum prices? If not, why?	Yes, Evoenergy supports the market approach -- early prices are likely to be higher until the market is mature.