



Program Review 2022-23

Summary of public
consultation submissions

GreenPower | November 2023



Contents

Executive Summary	4
Key themes in consultation responses	4
1. Market context	5
2. Short-term changes	6
2.1. LGC vintage requirement	6
2.2. Aligning generator accreditation dates with the CER	7
2.3. Incorporating the RET in GreenPower products	7
2.3.1. <i>Options for recognising the RET</i>	7
2.3.2. <i>Minimum GreenPower percentage</i>	9
3. GreenPower in 2025	10
3.1. Program mission	10
3.2. Program objectives	11
3.3. Additionality	13
3.3.1. <i>The importance of additionality</i>	13
3.3.2. <i>Actions to increase additionality</i>	13
3.4. Actions to increase demand	16
3.4.1. <i>Partner promotion strategy</i>	16
3.4.2. <i>Should GreenPower providers be able to sell other green products?</i>	17
3.4.3. <i>Marketing guidelines and compliance</i>	18
3.5. Actions to improve consumer choice	18
3.6. Generator accreditation	19
3.7. Additional options GreenPower could pursue	20
3.7.1. <i>Retailer star rating system for renewables and emissions</i>	20
3.7.2. <i>Scope 2 emissions fund</i>	21
3.7.3. <i>Real-time 24/7 load-matching</i>	21
4. Did we forget anything?	22

Executive Summary

GreenPower conducted a public consultation in 2022 as part of a review of the National GreenPower Accreditation Program. The consultation sought stakeholder feedback on proposed changes to the GreenPower program.

In total, 44 submissions were received from a variety of organisations, including:

- peak industry associations
- electricity gentailers and retailers
- local councils
- state and federal government agencies
- non-governmental organisations

Key themes in consultation responses

- **A majority of respondents to the consultation felt GreenPower should aim to be as affordable as possible.** It was unclear however whether respondents were aware that program administration costs are only estimated to be 1-2% of the costs of GreenPower with the majority of costs being attributable to the price of Large Scale Generation Certificates (LGCs).
- There was **a preference for GreenPower to prioritise compliance with carbon accounting** standards over additionality as many saw additionality as a cost driver.
- **Most respondents welcomed the proposal to help ensure renewable electricity is generated close to the period in which the electricity was** consumed through a certificate vintage requirement. There were some concerns regarding proposed generator age restrictions and the option to only accredit new projects. Since the consultation closed, RE100 updated its technical criteria including a generator age limit of 15 years and recommendations for certificate vintage requirements .
- **Recognition of the full Renewable Power Percentage (RPP) across all GreenPower products was generally favoured** with some retailers seeing value in only including it in 100% renewable electricity products. A new minimum of 30% or 50% GreenPower in retail products was also widely supported in line with integrating the RPP.
- A **strong need for more and better marketing and promotion of GreenPower** was raised by many respondents. Raising program fees to pay for more marketing was however generally not supported, but again it is unclear if respondents were aware of the currently low cost of program administration and marketing.

Submissions could be made confidentially or made publicly available. Public submissions are at www.greenpower.gov.au/about-greenpower/consultations/program-review-consultation-submissions

It should be noted that we received responses to the consultation from only one household and one renewable energy generator. GreenPower will be conducting additional targeted consultation on the proposed changes as they develop and will engage further with GreenPower buyers, generators and providers.

1. Market context

Consultation Question 1

1. Do you agree with the above market changes being the main drivers impacting GreenPower sales, public perception and its future role? Are there any other key drivers not included here?

Consultation participants agreed with the market changes identified in the consultation paper and added the following as additional drivers for consideration by GreenPower:

- cost and affordability of GreenPower if purchasing 100% GreenPower is the customer's objective
- government subsidies for rooftop solar make it a cheaper method to gain access to renewable energy
- impact of inflation and perceived cost of electricity
- complexity of the program and lack of tangibility
- stakeholders having focused on other methods of purchasing renewable electricity including self-generation, Power Purchase Agreements (PPAs) and the purchasing and surrenders of LGCs by larger electricity consumers outside of GreenPower
- some stakeholders holding the view that there is no oversupply of LGCs that reduces the market impact of GreenPower. Stakeholder noted there may instead be an artificial under-availability of LGCs which is inflating the cost of renewable electricity.
- the potential value of considering 24/7 load matching and tracability in GreenPower Products.

2. Short-term changes

Note: While GreenPower was previously aiming to implement short-term changes in 2023, it is acknowledged that some changes required further targeted consultation and development and the provision of sufficient lead time to program participants. We now anticipate that several of the below short-term changes will take effect on 1 January 2024.

2.1. LGC vintage requirement

Consultation Question 2

2. Should a vintage requirement for GreenPower certificates be introduced, and what should the validity period be? Should it be 36 months, shorter or longer, and why?

Certificate vintage requirements help ensure renewable electricity is generated close to the period in which the electricity was consumed.

31 responses to this question were received:

- **26 submissions supported** the introduction of a vintage requirement of 36 months and nine submissions proposed a shorter requirement of 12 to 24 months. The shorter validity period was preferred by a mix of organisation types.
- **Five submissions** – of which the majority were retailers / gentailers – did not support a vintage requirement and cited the additional cost for retailers as their reasons. If it is to be introduced, a sufficient notice period was asked for by a number of respondents.

Note: RE100 released updated technical criteria after the consultation closed which set out best practice for renewable energy procurement. Best practice recommendations by RE100 in the updated technical criteria and in earlier guidance include:

- the GHG Protocol's Scope 2 Quality Criteria which include a requirement that "All contractual instruments used in the market-based method for scope 2 accounting shall ..."be issued and redeemed as close as possible to the period of energy consumption to which the instrument is applied". Note: these contractual instruments include renewable energy certificates such as GreenPower LGCs.
- the certificate vintage requirements of the Green-e standard which require certificates to be created within the last 21 months.

This further strengthens the case for GreenPower to consider a LGC vintage requirement for Providers and we will conduct further targeted stakeholder engagement on this potential requirement.

2.2. Aligning generator accreditation dates with the CER

Consultation Question 3

3. Do you agree with GreenPower aligning its generator accreditation dates with the CER accreditation date? If not, why?

There were no objections to this proposal. 19 respondents said 'Yes', and 25 did not reply to it.

Update from GreenPower: Due to its benefits and the widespread support for this proposal from all respondents who commented on it, this change will be incorporated into the GreenPower program rules. While GreenPower will adopt this as a general rule, it reserves the ability to set its own generator accreditation date in some particular situations.

2.3. Incorporating the RET in GreenPower products

2.3.1. Options for recognising the RET

Option A: new 100% renewable energy logo

- Introduce a new logo for 100% Renewable Electricity, which takes the RET into account.
- Keep all other GreenPower product options additional to the RET and voluntary (e.g. a 50% GreenPower product would not include the RET).
- A 100% GreenPower product (additional to the RET) will continue to be available but Providers may no longer offer it.

Option B: include the RET in all GreenPower percentages

- Include the RET in all GreenPower products and percentages.
- The RET percentage (RPP) would be a fixed percentage of approx. 15% to avoid annual changes to products.
- Increase the minimum GreenPower product percentage (currently 10%) to 50% to ensure every product has a real impact. This has to be managed carefully for customers that currently purchase a lower percentage.

Consultation Questions 4-6

4. Does Option A sufficiently address the demand from stakeholders to recognise the RET for 100% renewable electricity claims? If not, why?
5. What are the advantages of Option B? Would fixing the recognised RET percentage be a good solution to deal with the annual changes to the RPP?
6. The above proposal is a solution that can be quickly implemented. Should GreenPower consider a different approach in its long-term program design?

Question 4:

33 responses were received:

- **16 respondents did not support Option A or preferred Option B.** Inequality, confusion of customers and inconsistency in recognition and reporting were stated as reasons for rejecting Option A.
- **15 respondents supported Option A.** Of these, nine (9) were gentailers / retailers who said Option A is a significantly easier option to implement. Other respondents suggested that Option A would be a good short-term solution only.
- 2 responses were ambivalent and suggested further customer engagement should be conducted to clarify the level of support for each option.

Questions 5 and 6:

29 responses were received:

- **Six respondents did not support fixing the RPP** across all percentages, and four of these were electricity gentailers/retailers. Reasons mentioned for rejecting Option B were complexity, administrative burden on retailers who need to create new products, not recognising below-baseline generation, and the difficulty in explaining the change and products to customers. Some of the arguments were based around fixing the RPP percentage and the confusion/complexity of getting a fixed RPP recognised by NGER, ClimateActive, etc. and could probably be resolved by recognising the full RPP each year. Some stakeholders also had concerns that RET surrenders would not all be from GreenPower accredited generators.
- **19 respondents supported Option B**, and 11 of them thought GreenPower should fully recognise the RPP as 15% is not sufficient. Proposals included fixing it at 19% or reviewing it every 3-4 years.
- Four respondents had more questions or considerations to add but made no clear statement on whether they supported this option. Providing retailers sufficient time to implement any new requirements, e.g., by allowing 'grandfathering' of some products, was also mentioned.

Update from GreenPower: GreenPower is considering proceeding with a modified version of Option B in which RET surrenders by Providers are recognised by GreenPower at the value of the Renewable Power Percentage (RPP) set by the Clean Energy Regulator each year. If RET surrenders are recognised by GreenPower, we would also increase the minimum product percentage as discussed in the next section of this paper.

These changes should overall make GreenPower more affordable for businesses and households and bring GreenPower into closer alignment with global market-based carbon accounting standards.

We will consult further on these issues in late 2023 and early 2024 including with GreenPower Providers, Generators and managers of standards and frameworks such as NABERS, Climate Active and RE100.

2.3.2. Minimum GreenPower percentage

GreenPower proposes to increase the minimum product percentage to 50%.

Consultation Question 7

7. Which minimum percentage do you think is the most appropriate if Option B noted in 4.3.2 is chosen, and why?

27 responses were received to this question: **22 agreed the minimum should be raised if the RPP is recognised** across all percentages. **Five were not supportive of raising the minimum percentage.**

- **13 respondents supported increasing the minimum GreenPower accredited product percentage to at least 50%.**
 - o Seven respondents suggested 50% as a minimum product percentage.
 - o Six submissions, including two gentailers/retailers would like to see 100% as the minimum. A 'beyond 100%' product was also recommended.
- **Nine respondents**, a mix of council and gentailer/retailers, **preferred 30% as the new minimum product percentage**, and cited affordability as the main reason to not go higher. It was also suggested by many of these respondents that any minimum percentage should be additional to the RET, unless it's a 100% product. A staged increase to higher than 30% was also suggested for consideration.
- **Five respondents did not support the minimum percentage.** The majority of those were retailers/gentailers. The main argument against lifting the minimum was an expected reduction in demand due to the reasons noted in answers to Questions 4, 5 & 6.

Update from GreenPower: The minimum percentage of GreenPower will be increased if the recognition of the RPP comes into effect. The new minimum percentage will likely be between 30% and 50%. If this change comes into effect, we will work closely with GreenPower Providers to implement this and to communicate it clearly to GreenPower customers.

3. GreenPower in 2025

3.1. Program mission

The following is an illustration of a potential expanded mission:

To drive investment in renewable energy in Australia, with a view to decreasing greenhouse gas emissions from energy use, by increasing awareness of, and ensuring consumer confidence in, environmentally sound renewable energy products.

Consultation Questions 8-9

8. Should GreenPower's mission expand to include all forms of renewable energy, for example hydrogen, and is the role of GreenPower the same across different energy carriers?
9. Is there anything else that you think should be part of GreenPower's mission statement?

25 responses were received to Questions 8 and 9:

- **Twelve (12) submissions were not supportive of the proposed expansion of GreenPower's mission to all forms of renewable energy.** This included advocacy groups, five (5) retailers/gentailers, as well as councils/state government and peak body agencies. The submissions argued an expansion would dilute the brand, add confusion and complexity. In addition, the effort involved was seen as disproportionate to the likely uptake.
- **Eleven (11) submissions were supportive of the inclusion of all forms of renewable energy.** Proponents include a mix of gentailers and well as peak industry bodies (including gas peak bodies).
- **One (1)** response was supportive of including renewable gas but at a later point in time when markets are more mature. **Another (1)** response stated there may be a role for renewable gas if governments set hydrogen targets.

Other ideas suggested for GreenPower to consider including in its mission statement were:

- improving affordability (by not focussing on additionality)
- considering socially responsible renewable energy
- being more customer centered to enable, empower and attract customers to buy GP, and similarly improve consumer awareness and confidence
- being more objective and outcome focused with quantitative program objectives, i.e. achieving 100% renewable electricity by no later than 2035
- ensuring GP is 'real' in law, fairly priced and not double counted
- Be the overseer of the most honest and credible renewable energy certifying system

Proposals for a new GreenPower mission statement suggested by respondents included:

- *That GreenPower is to be Australia's accredited renewable electricity assurance framework, serving the needs of electricity consumers buying accredited renewable electricity from the grid, and to guide electricity providers and retailers in meeting the interests of renewable energy consumers.*
- *To drive consumers towards procuring environmentally sound 100% renewable electricity.*
- *To accelerate the adoption of renewable energy as the energy source of choice by consumers.¹*
- *To drive investment in renewable energy in Australia, with a view to decreasing greenhouse gas emissions from the generation of electricity, by providing communities and businesses with easy access to credible and equitable renewable energy products.*

Update from GreenPower: We have decided to proceed with the proposed expansion of GreenPower's mission due to the extensive positive stakeholder feedback received in 2023 following the launch of the Renewable Gas Certification Pilot.

3.2. Program objectives

Consultation Questions 10-11

10. Please give each of the above 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.
11. If you suggested a change to the program mission, what should be the corresponding objectives? What score would you give them?

Objective	# responses	Total points	Average points
Increase awareness and demand for voluntary renewable energy products	14	62	4.4
Decrease nationwide greenhouse gas emissions from energy use	13	55	4.2
Support new voluntary markets for emerging renewable energy and fuel types	13	40	3.1

¹ "Accelerate" - implies urgency, consistent with the decarbonisation imperative under the Paris Agreement. "Adoption" - the focus should be on encouraging consumer uptake to drive investment in renewables. "Energy" - provides for a wider remit; Greenpower's immediate focus should continue to be on electricity, with probable expansion to other renewable energy sources (e.g. renewable gases) at an appropriate time.

Objective	# responses	Total points	Average points
Provide access to renewable energy products that:			
<ul style="list-style-type: none"> are 100% renewable 	15	67	4.5
<ul style="list-style-type: none"> lead to new and additional renewable energy projects being built and dispatched 	14	51	3.6
<ul style="list-style-type: none"> are transparent, independently audited and assured 	15	69	4.6
<ul style="list-style-type: none"> are affordable 	14	56	4.0
<ul style="list-style-type: none"> are aligned with best practice carbon accounting frameworks 	15	67	4.5
<ul style="list-style-type: none"> enable consumers to reduce and avoid energy-related emissions 	15	71	4.7
<ul style="list-style-type: none"> support best practice in renewable energy development to improve environmental, social and economic outcomes in their host communities 	16	60	3.8
Advocate for consistent and best practice renewable energy and carbon accounting	15	65	4.3
Advocate for best practice energy product marketing to enable informed decision making by consumers	14	64	4.6

Other suggested objectives:

Suggested Objective	# responses	Total points	Average points
Assure that the voluntary efforts of GreenPower customers are not being double counted and used by other parties to gain a free ride	2	10	5.0
Enable access to purchase GreenPower from pre-1997 renewable infrastructure that otherwise meets GreenPower quality standards	2	10	5.0
Increase awareness and demand for renewable energy products that contribute to reduction in ghg emissions on a 24/7 basis	1	5	5.0
Renewable energy that is additional to the RET mandatory requirements (until 2030, aligned with the RET. After this time, this requirement could simply be for 100% renewable energy)	1	5	5.0
... clearly differentiated from Climate Active to avoid cannibalisation. It is important potential customers understand why GreenPower attracts a premium. Greater awareness regarding RE100 alignment may also be helpful to customers.	1		

3.3. Additionality

3.3.1. The importance of additionality

Consultation Question 12

12. Should GreenPower focus on maximum additionality, electricity carbon accounting, or should both types of products be supported?

29 responses were received to this question:

- **17 submissions**, a majority retailers/gentailers and councils, advocated for GreenPower focusing on **carbon accounting**. With the transition to renewables well on the way, the additionality focus was seen to add unnecessary complexity and cost. Instead, the preference of the respondents was to look at legal allocation / avoidance of double counting of environmental benefits, increasing uptake and reducing cost.
- **Seven (7)** responses supported **both** types of products. Two retailers/gentailers argued additionality above the RET and below baseline renewables is useful, but that beyond that it could be difficult to measure.
- **Five (5)** responded with a preference for **additionality**; with some responses voicing a preference to stay this way at least until a REGO scheme is established.

Two submissions urged GreenPower to advocate for GreenPower surrenders to be considered additional to the Australian Government's international obligations, for example through the surrender of international carbon credit units by the Australian Government to match all GreenPower purchases, as was done for a short period under the Gillard/Rudd Government.

3.3.2. Actions to increase additionality

LGC vintage requirement - limiting the validity of certificates

Consultation Question 13

13. Should a vintage requirement for GreenPower certificates be considered in the long-term design of GreenPower, and why?

20 responses were received to this question:

- **14 were supportive of a vintage restriction** in the long term.

- **Four (4)** responses were not supportive of a vintage requirement for certificates. A preference was voiced for only accrediting new generators.
- One respondent wanted to see time-matched certificates as well as focus on the kind of resources required for the transition, i.e. storage, baseload renewables and diversity of supply.
- One respondent argued LGCs don't incorporate the 'use of renewables' or 'zero electricity emissions' and therefore their current role to provide assurance is not appropriate.

Update from GreenPower: RE100's updated technical criteria will also be taken into account when making a decision on this point. Please refer to question section 2.1 for further information.

Generator age limit

Consultation Question 14

14. Should GreenPower consider a generator age limit approach? If so, why?

20 responses were received to this question:

- **15 were not supportive of** a generator age limit. Responses noted expected increases in cost for customers through a limitation of eligible certificates and increased administrative costs as well as the reduction of an income stream for older generators. Respondents also commented that renewable energy – no matter the age of the generator – contributes to the objectives of the program.
- **Four (4) were supportive of a generator age restriction.** One submission mentioned that a generator which has already exceeded its payback period should not get more money and suggested a five year age limit.

Update from GreenPower: New RE100 technical criteria including a generator age limit of 15 years (with some exemptions for existing PPAs and re-powering of generators) come into effect on 1 January 2024. Many businesses that purchase GreenPower are working toward RE100 certification. GreenPower is working on introducing a 15-year generator age limit which is in alignment with RE100 to come into effect on 1 January 2024.

Certification of new projects only

Consultation Questions 15-16

15. Should GreenPower restrict participating generators to new projects only? And if yes, why?
16. How well would this option deliver on the GreenPower mission and objectives? Does this differ for households, small and large businesses?

19 responses were received to Question 15:

- **16 responses were not supportive of** the certification of new projects only. Increased complexity and cost were the main reasons mentioned.
- **2 responses were in favour of this option** as this option would ensure maximum additionality.
- One submission requested more information.

10 responses were received to Question 16:

- **Four (4)** responses argued that this option **would not deliver on GreenPower's mission and objectives**. Market confusion, cost and lack of flexibility for smaller providers to offer access to GreenPower were mentioned as reasons.
- **Four (4)** submissions argued it would deliver '**moderately well**' (3) or '**slightly well**' (1) on the program's mission and objectives.
- **Two (2)** participants argued it would deliver on the objective to drive investment in renewable energy.

3.4. Actions to increase demand

3.4.1. Partner promotion strategy

Consultation Questions 17-18

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?

20 responses were received to Question 17. Suitable partners mentioned by respondents included:

- renewable energy developers
- public energy comparison websites (e.g., Energy Made Easy, Victorian Energy Compare)
- private comparison websites (e.g. Choice and Ginder)
- councils
- industry organisations (e.g., Clean Energy Council)
- AEMO as a partner for time-based certification program
- Climate Active
- NABERS
- RE100
- jurisdictional programs such as Sustainability Advantage and CitySwitch
- retailers
- any government program which encourages electrification
- EV drivers
- public libraries
- schools
- Australia Post

22 responses were received to Question 18:

- **Seven (7) supported** an increase in program fees to fund more marketing activities.
- **Nine (9) did not** support an increase. Out of these nine, six were councils. Councils generally noted concerns that an increase in marketing cost would drive up the price of GreenPower and advocated for government to increase its financial contribution to the GreenPower program instead. It is not clear if respondents were aware of the currently very low contribution of program administration to the price of GreenPower (~1-2%).
- **Six (6)** submissions, five of which were retailers / gentailers did not explicitly support or reject this proposal. Instead, GreenPower was urged to ensure that any marketing activities are carried out in a cost-effective manner to keep affordability and overall cost

in mind. Respondents noted that marketing costs should not to be passed on to retailers. Noted here is that it is likely that retailers would pass on any additional marketing costs that they incur to customers as part of the GreenPower program fee.

3.4.2. Should GreenPower providers be able to sell other green products?

Consultation Question 19-20

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?

22 responses to Question 19

- **16 submissions were not supportive of** GreenPower restricting what other sustainable products providers can offer. Seven of those were retailers / gentailers. Alternative suggestions included to advocate for Climate Active to phase out carbon neutral electricity product certification, to strengthen communications around differences between carbon offsets and GreenPower, as well as advocating for regulation that enforces best practice carbon accounting and only recognises renewable electricity, not carbon neutral electricity.
- **Six (6)** submissions were supportive of this restriction with one suggestion being made that the CER and ACCC could be given direction for monitoring and taking enforcement action against retailers selling any products claimed to be 'green' that are not based on renewable electricity.

Responses to Question 20

- clarity / clearer advertising and marketing to make GP more understandable and differentiate from carbon offset-based products (6)
- government comparison websites (2)
- Increasing the product minimum to 100% GreenPower
- electricity retailer ratings that take their use of carbon offsets vs actual renewable generation into account
- load matching – LGCs in itself are seen as offset so new program design needs to differentiate
- clarity in accounting: Below baseline + RET + voluntary GP) =100%
- Advocate for actions that can be used for energy-related emissions reductions to be limited to renewable energy, energy efficiency or electrification.

3.4.3. Marketing guidelines and compliance

Consultation Questions

21. Should GreenPower set strict requirements for how providers promote GreenPower and onboard GreenPower customers, i.e. how easy it is to get GreenPower?

21 responses

- **Eleven (11) supported** strict requirements. GP should be the default 'green' energy product. Style guides and consistent easy pathways such as a standard tick box or form could help with promotion and clarity. Minimum requirements for retailers to promote GP, including transparency of benefits and differentiation to carbon offsets.
- **Six (6) were not supportive of this proposal** – all were retailers / gentailers. They noted the risk of gentailers/ retailers exiting the program if requirements are too strict and flexibility is restricted. Suggestions included to focus on consumer awareness and education instead, for example to improve sales staff knowledge of GreenPower.
- **Three (3) responses said more clarity and disclosure of information was required** but did provide a clear yes or no to this question.

3.5. Actions to improve consumer choice

Consultation Questions

22. Are there any other customer segments that are unable to access GreenPower?

23. How can GreenPower support more flexibility for small energy users to purchase small quantities of GreenPower, such as for embedded network customers?

Question 22:

Except for the ones listed in the program review paper, such as embedded networks, no particular other segment was identified. Cost was mentioned as prohibitive to uptake and councils requested that the role of aggregators should be investigated further as well as exploring legislative frameworks for councils to support uptake.

Question 23:

Responses noted that GreenPower:

- could work with embedded network providers to promote and incentivise uptake

- should offer a 'buy direct' option for households for EVs or annual energy in bulk that doesn't have to be purchased from an energy retailer
- may not need to dedicate resources to this due to current regulatory developments as further market accessibility regulations are being developed
- could establish a fund to subsidise low-income households purchasing GreenPower
- could consider a premium vs standard product offering that distinguishes based on generator co-benefits, social co-benefits or other criteria.

3.6. Generator accreditation

Consultation Questions

24. Should GreenPower reduce its accreditation requirements, or make them stricter; and what do you think is the benefit of either approach?
25. What are the most important aspects that GreenPower should consider in its generator assessment?

Question 24

18 responses

- **Nine (9) responses argued for reducing the requirements for generator accreditation.** Almost all of those were retailers / gentailers. In particular, wind and solar projects which are CER accredited were proposed to be accepted without further assessment while a differentiated assessment or even a blanket exclusion of biomass and wood waste electricity generation was suggested. It was also suggested to include small-scale generation. (Note: Since the consultation, renewable energy from native forest wood waste has been removed from the list of eligible fuel sources under the RET).
- **Seven (7) submissions were supportive of stricter generator accreditation requirements:**
 - Concerns were raised that current state planning and environmental approval processes are not sufficient.
 - Projects utilising wood waste / native forest and any projects that required native forest clearing were highlighted.
 - Some respondents argued that any renewable energy use that has already been claimed on site / behind the meter should be excluded.
 - Some respondents argued that GreenPower's assessment criteria should not include mandatory criteria already included in state / territory / federal laws but should focus instead on additional voluntary requirements that go above and beyond these mandatory criteria.

Question 25:

Respondents to this question argued the most important aspects that GreenPower should consider in its generator assessment are:

- renewable electricity that is free of fossil fuels
- no recognition of producer-consumers, such as in mining, resource processing etc. These are large companies that have generation and on-site usage but are also eligible to sell LGCs.
- deforestation, community consultation, supply chain emissions, and a strategy for recycling beyond the lifespan of the project
- If GreenPower focuses on carbon accounting, then ALL renewables should be recognised.

3.7. Additional options GreenPower could pursue

3.7.1. Retailer star rating system for renewables and emissions

Consultation Questions

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?

28 responses

- **Nine (9) were not supportive of** an energy retailer rating, four of those were retailers / gentailers.
- **17 liked or were ok with the idea of a retailer rating.** There was uncertainty about duplication of the Greenpeace retailer rating and whether GreenPower was the right organisation to actually execute this rating. Important aspects mentioned were the inclusion of hedging contracts (including if on-sold in the short-term electricity markets).

3.7.2. Scope 2 emissions fund

Consultation Questions

28. What would the minimum fund size need to be to provide material incentives for industry participation in auctions?
29. How could the fund's emissions reductions be allocated to investors or GreenPower customers?

General consensus is that this proposal should not be part of GreenPower. Only one peak body was supportive of this option but suggested it may be beyond program resourcing at this time.

3.7.3. Real-time 24/7 load-matching

Consultation Question

30. How important is 24/7 renewable electricity coverage to businesses in Australia? Are companies prepared to pay more than normal GreenPower for a 24 / 7 load-matched product accredited by GreenPower?

17 responses

- **Eight (8) submissions were not supportive of 24/7 renewable electricity coverage** and these were from a mix of organisations: retailers / gentailers, councils and peak bodies.
 - Objections: It was seen to be too complex and costly, suitable for sophisticated users only. GreenPower was seen by some as being accreditation-focused and that load matching could be done through PPAs.
- **Four (4) submissions were neutral** arguing that systems, not products, need to enable 24/7 renewables, and that the Collaborative Research Centre RACE for 2030 has a project called 24/7 TRUZERO that GreenPower could collaborate with when markets are more mature.
- **Five (5) submissions said this is important.**
- Four out of five submissions that answered the question 'are companies prepared to pay more for 24/7' said 'yes' and also noted that 24/7 load matching is important.

4. Did we forget anything?

Consultation Question

31. In your experience with GreenPower, is there anything else that could be done to improve the efficacy and effectiveness of the program?

Responses included:

- GreenPower should reduce costs as much as possible.
- Could GreenPower scale the generator accreditation fee differently according to generator size? What about the ongoing fee?
- Is an audit every second year better?
- Provide postcode level reporting data.
- Get more support from state and federal governments for program expansion, marketing and to reduce GreenPower prices.
- Establish legal foundations of LGCs / zero-emission claims and allocation processes.