



6 September 2018

Submissions  
Climate Change Authority  
Email: [submissions@climatechangeauthority.gov.au](mailto:submissions@climatechangeauthority.gov.au)

Dear Sir/Madam,

**Review of the National Greenhouse and Energy Reporting Legislation - Consultation Paper**

Thank you for the opportunity to provide feedback on the Review of the National Greenhouse and Energy Reporting Legislation - Consultation Paper (**the Consultation Paper**). This submission is made on behalf of Energy Queensland Limited ACN 612 535 583 (**Energy Queensland**).

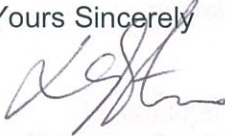
Energy Queensland is a Government-owned corporation which provides electricity to approximately 4.8 million Queenslanders. Electricity is distributed by its subsidiaries, Ergon Energy Corporation Limited and Energex Limited, via a network ranging from Tweed Heads up to the Torres Strait and from Brisbane across to Birdsville. This network consists of 33 isolated power stations, 72 bulk supply points, 571 zone substations and 205,000km of powerlines (overhead and underground). Energy Queensland's electricity network is the largest in Australia and is recognised in the Queensland State Planning Policy as a State interest which drives the economy and provides essential services and facilities to Queenslanders.

Energy Queensland provides the following feedback in response to the questions raised in the Consultation Paper.

1. Energy Queensland currently reports its carbon emissions under the National Greenhouse and Energy Reporting Scheme (**the Scheme**). Energy Queensland finds that the reporting thresholds, scope and frequency are acceptable and the emissions calculation methods are fit for purpose. The Reporting tool is adequate, but the report would be more useful if the activity description was included.
2. The emissions thresholds under the safeguard mechanism are appropriate. Energy Queensland believes that lowering the threshold would increase its administrative burden by increasing the number of facilities under the safeguard mechanism which would subsequently increase its reporting costs.
3. Energy Queensland does not currently use data from other emitters provided under the Scheme.
4. Energy Queensland has experienced difficulty in obtaining auditors as some listed auditors may have moved employers and are no longer performing these audits.

We trust the abovementioned comments will be taken into consideration and greatly appreciate the opportunities that the Climate Change Authority have provided us in participating in the review of the Consultation Paper. Please contact Darren Broadbent on (07) 49327196 or via email address: [darren.broadbent@energyq.com.au](mailto:darren.broadbent@energyq.com.au) for any further information in relation to this submission.

Yours Sincerely



Hugh Stone  
Risk and Systems Manager