General comment on the Review of the Renewable Energy Target

So far the RET schemes seem to have performed very well. I appreciate the opportunity to support the RET and would discourage any significant changes to the RET. In particular it was good to read that the cost of the RET is continually reducing which should ensure future success.

Comments on questions posed in the RET Review Issues Paper

Large-scale Renewable Energy Scheme

Are the existing 41,000 GWh LRET 2020 target and the interim annual targets appropriate? What are the implications of changing the target in terms of economic efficiency, environmental effectiveness and equity? (pg25)

Yes, I support the existing 2020 and interim targets. Changing the targets may create uncertainty in the renewable industry and discourage investment.

In the context of other climate and renewable policies, is there a case for the target to continue to rise after 2020? (pg25)

This issue would be better addressed when we are closer to 2020 and have gained more experience in achieving the RET.

Should the target be a fixed gigawatt hour target, for the reasons outlined by the Tambling Review, with the percentage being an outcome? (pg25)

Yes, a fixed target gives the industry a higher level of certainty and will encourage investment.

Should the target be revised to reflect changes in energy forecasts? If so, how can this best be achieved – as a change in the fixed gigawatt hour target, or the creation of a moving target that automatically adjusts to annual energy forecasts?
How should changes in pre-existing renewable generation be taken into account? What are the implications in terms of economic efficiency, environmental effectiveness and equity? (pg25)

No, the target should remain at a fixed level to provide investors with the maximum level of confidence.

Is a list approach to 'eligible renewable sources' appropriate?
Are there additional renewable sources which should be eligible under the REE Act?
Should waste coal mine gas be included in the RET?
Should new capacity of waste coal mine gas be included in the RET?
What would be the costs and benefits of any recommended changes to eligible renewable sources? (pg 31)

The list approach gives the renewables industry a solid base to work from. Waste coal mine gas generation is not renewable and should not be included in the RET.

Small-scale Renewable Energy Scheme

What do you consider to be the costs and benefits of having a separate scheme for small-scale technologies?
Should there continue to be a separate scheme for small-scale technologies? (pg 33).

Yes, the use of separate schemes overcomes the fundamental differences between small and large scale projects and facilitates market stability. Small scale technologies are able to produce renewable energy at the point of use which takes load off our infrastructure and avoids potentially large distribution losses.

Is the uncapped nature of the SRES appropriate?
What do see as being the costs and benefits of an uncapped scheme in terms of economic efficiency, environmental effectiveness and equity?
Is the SRES driving investment in small scale technologies?
Is it driving investment in skills? (pg 34).

The uncapped nature of the SRES seems to have been very successful so far. Capping the scheme may only cause market instability and perhaps discourage investors. The demand for small scale technologies has also provided a demand for skilled installers.

What is the appropriate process for considering and admitting new technology to the SRES?
Should any additional small scale technologies be eligible to generate STCs?
Is it appropriate to include displacement technologies in the SRES?
Should additional eligible technologies be limited to generation technologies? (pg 36)

Any small scale technology that reliably generates renewable energy or uses a renewable energy source to displace conventional energy should be eligible to generate STCs.

Is deeming an appropriate way of providing certificates to SRES participants?
Are the deeming calculations for different small-scale technology system reasonable? (pg 37)

Deeming is a suitable method of overcoming upfront capital cost issues and reduce the need for monitoring and reporting outcomes. The solar and heat pump water heater deeming calculations are fine. I have no knowledge of the calculation for other technologies.

What are the lessons learned from the use of multipliers in the RET? Is there a role for multipliers in the future? (pg 38)

It appears the multipliers had a very positive effect on the initial uptake of PV technology. This was a great advantage to the industry however, now that the effect of the SCM scheme is almost over, they should not be included in the RET in the future.

Are the SRES administration arrangements appropriate and working efficiently? (pg 41)

Yes, I believe so!

Diversity of Renewable Energy Access

Should the RET design be changed to promote greater diversity, or do you think that, to the extent that there are barriers to the uptake of other types of renewable energy, these are the

most cost-effectively addressed through other means?
What would be the costs and benefits of of driving more diversity through changes to the RET design? (pg 51)

The RET seems to be working very well in it's current form. Making any significant changes to the RET would only increase the risk of losing investor confidence.

Review Frequency

What is the appropriate frequency for reviews of the RET?
What should the review focus on? (pg 46)

The RET has been massaged into shape over an extended period of time. Perhaps it would be more useful to expend the resources used in regular reviews to begin planning for Australia's renewable energy future post 2020.

Sincerely,

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