

Our ref: 4421772
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Greenhouse and Energy Reporting Taskforce
Department of Climate Change
GPO Box 854
CANBERRA ACT 2601

Dear Sir/Madam

Technical Guidelines for the Estimation of Greenhouse Emissions and Energy at Facility Level

Western Power welcomes the opportunity to comment on the above guidelines. Following are our comments on specific questions and issues raised in the overview paper and the guidelines:

Comments on Overview Paper

- Question 1. Stakeholder views are sought on whether the listed fuel types provide sufficient details for companies to report on fuel types,
Response 1. The most part yes. See specific comments on technical guidelines.
- Question 2. Do companies have data systems in place to facilitate the reporting of equipment in use for consumption of energy etc.
Response 2. Yes, Western Power has the systems in place to report.
- Question 3. Stakeholder views and preferences are sought on the different reporting options of electricity (Scope2) as outlined in the Attachment C box,
Response 3. Western Power prefers the first option that uses a system based approach rather than contract information which would require a great deal more work for little improvement in accuracy of information.
- Question 4. Should Scope 2 emissions be estimated using default national or default state emissions factor.
Response 4. State based factors are appropriate rather than a national factor as they are easily determined and more accurate.

General Comments on Technical Guidelines

- The use of the reporting checklist for each section (eg. Table 18) is an excellent innovation, however if an emission or reporting requirement on the list is not applicable to an industry then are we required to report? Are we required to report everything on the list or do we report zero, NA or leave it blank? Experience with National Pollutant Inventory reporting suggests that this may become a significant issue.
- The old F&M workbook included worked examples, which assisted in an understanding of what was required. I believe worked examples would also greatly assist in understanding some of the more complex areas in the Guideline.

Specific Comments on Technical Guidelines

- **Section 3.10, Table 19** – Electricity-Internal Combustion should be added as a category under production of electricity.
- **Appendix 3.2 – Table 23** – It is not clear whether this table is only meant to apply to Scope 1 emissions as it is in the Scope 1 section or should include Scope 2 & 3 emissions. Electricity consumption from the grid is included in the table, which is a Scope 2 emission. If this table is meant to be a general table for all scopes then Electricity Transmission & Distribution Losses should be added and the table relocated elsewhere in the document. If not and it only applies to scope 1 then scope 2 & 3 emissions should be removed.
- **Section 5.5** - The equation on Page 106 can be expressed in a less confusing manner. If E_{SF_6} is in CO₂-e, then rather than express the contents of the piece of equipment in kg CO₂-e, wouldn't it be simpler to modify the equation to allow the contents of the equipment to be quoted in kg SF₆ and multiply by the GWP of SF₆.
- **Chapter 8** – The formula on page 142 references Table 78 when it should be Table 79.
- **Chapter 8** – The application and use of the factor in column B, Table 79 is not clear. A worked example would assist in a clearer understanding of its use (see second dot point under general comments).
- **Annex 3, Equipment Type**
- Under the category of Other, Transmission Losses would be better described as Transmission and Distribution losses if this category were meant to apply to the electricity industry.
- Does Road Transport Equipment include fleet vehicles such as cars? If not, then an extra category needs to be added, namely Passenger Fleet Vehicles.
- Is electricity consumed in buildings classified as Own Use? If not this also requires it's own category.

Yours sincerely

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