

Below are some comments on the NGERs Technical Guidelines Discussion Paper, compiled from Queensland Government agencies.

- Queensland may need additional data requirements to that proposed by the Guidelines. For example, data requirements for the 13% Gas Scheme are calculated based on factors influenced by Queensland's geographic considerations and load profile, and related policy designed to encourage fuel switching to gas. The data sets collected by NGERs will therefore be inconsistent with the data requirements of the 13% Gas Scheme.
- There may also be more extensive reporting requirements associated with any options developed from COAG working group to accelerate or expand the uptake of energy efficiency measures, including the need for a comprehensive and integrated approach. The extent of reporting requirements will also depend on the scope and depth of an Emissions Trading Scheme.
- There may also be a need for further clarification of reporting of scope 2 greenhouse gas emissions. Reporting scope 2 emissions needs to take into account whether these emissions have been offset, for example, if a business has signed a green energy supply contract for 100 percent of its electricity consumption, the emissions for the business should be theoretically zero. Failure to recognise in the reporting system actions undertaken by energy consumers to minimise emissions is likely to discourage further support by consumers of renewable energy. This is particularly important for public reporting as public perception has a strong influence on corporate behaviour.
- Further clarification is also required of the reporting requirements (i.e. scope 2 emissions) for the distribution and transmission sectors. This could be helped by inclusion in Table 1.2.2 or a specific section in the Guidelines. Also, further clarification is required for end-users regarding whether end-users include or exclude electricity losses from transmission and distribution of purchased electricity. A diagram depicting the electricity supply chain and who is responsible for reporting on which part of the chain (scope 1 and 2 emissions for generation, losses and consumption) would be useful. Examples or case studies on typical reporting arrangements for a generator, distributor/transmitter, end-user and a company with a mix of generation and purchased electricity (e.g. mine with on-site generation) would also provide further clarity for business.