



Response to National Greenhouse and Energy Reporting System Regulations Discussion Paper

Section	Title	Response	Comments
2.1.1	Hydrofluorocarbons and perfluorocarbons	This section mentions an <i>IPCC 2001 Third Assessment Report</i> and that some values have been updated, when if at all will all the values be updated as per this third report?	
	Table 2.1 Hydrofluorocarbons to be included in regulations	There are some hydrofluorocarbons that are not listed in this table e.g. R22. This gas is still in use and what are the requirements for reporting on it or similar non-listed hydrofluorocarbons?	
2.2	Greenhouse gas emissions	A possibility of double accounting can occur e.g. a scope 1 emission is the fuel to generate electricity, however a scope 2 emission is electricity consumed in the generation station, thus could account for this scope 2 emission twice.	
		Scope 3 emissions, presently these are voluntary inclusions in the NGER Reporting, will there be further tightening to make these mandatory inclusions? That is, up and down the supply chain. Some of these maybe extremely difficult to obtain.	
2.2.1	Agriculture, forestry and fishing	Ergon Energy would like to nominate to be involved in additional consultations on methods and criteria for calculating greenhouse gas emissions.	
		Do projects that have two individual purposes, such as those that have offsets and then can be harvested for asset usage sit in this area?	

2.3	Energy	Ergon Energy would like to nominate to be involved in additional consultations on energy definitions and reporting methodologies.	
2.4.1	Joint Ventures and Partnerships (Nominations)	What about subsidiaries, who is responsible with reporting of emissions from these if the subsidiary is equally owned by two corporations?	
2.5.2	Aggregating data from small facilities	What happens for instance if the corporation owned several small facilities that do not trigger reporting thresholds, then is given a facility that will trigger these thresholds. Does the corporation only need to report on the triggering facility only? My reading is this is the case, however from a environmentally responsible point of view the corporation would report on all facilities.	
2.6.1	Ancillary activity	This could mean that electricity utilised in the generating station is an ancillary activity. Although it is not listed. Thus double accounting could occur (see above).	
	Vertical integration	The Sustainable Pole Project will need to be considered when reporting on GHG emissions. Thus energy utilised to grow trees, harvest and treat poles etc will need to be considered as a separate facility. Also how are the offsets generated by this project treated?	
2.6.2	Pipelines (ANZSIC code 502)	Assets that are acquired as part of government changes such as pipelines will require assessments to see if it is to be considered as a separate facility.	

		How do you ensure there is no double/triple counting of emissions, when one corporation extracts gas for use in the pipeline and another totally separate corporation reports on gas into the pipeline.	
	Latitudes and longitudes	Where do we site assets such as pipelines?	
		Is the network and all substations considered to be one facility?	
		There is requirement for separately identifying and reporting on all facilities upon registration (in this example buildings energy use), but from diagram in 4 it appears that we only need to separately report on large facilities. Thus this example may not be captured.	
3.1	Applying for registration	Assets that are acquired as part of government changes such as generating facilities will require assessments to see if it is to be considered as a separate facility.	
4.3.2	Facility thresholds	All being equal I would suggest that Ergon would use option 2 and report on all facilities, however see above.	
4.5	Contractor reporting	Does this apply to Ergon with respect to principal contractor relationships e.g. when we are the PC or vice versa.	
5.1	Offset credits	Does this apply to Ergon in the Sustainable Poles Project. What are other projects that this could apply to?	
6.1.1	Publishing separate scope 1 and scope 2 emissions	We presently report separate totals. Have no issue with reporting aggregate if required. Decision to be made at higher levels in Ergon.	

7	Compliance assurance framework	This section deals with compliance to the legislation. Raises issue with costs associated with compliance audits, liability of the CEO, further tightening of reporting requirements.	
7.3	External audits	If no contravention is identified by an audit compelled by the GEDO to review a suspected contravention, then the cost of the audit should be born by GEDO	
7.4.6	Penalties under the Act	What is meant by regular professional assessments? Once every ten years is regular! This needs clearer auditing specifications and requirements. The liability of CEO is limited to civil, however wording suggests this may include limits that apply to corporations. Thus do criminal penalties apply? Suggest that this legislation follows the QLD Electrical Safety Act, very good use of auditor/ing requirements.	
Q25 &27	Audit arrangements	Propose establishment of an audit panel from which auditors may be selected. The audit panel would be selected by the GEDO following a tender process. This will allow assessment of expertise and qualifications and aid consistency of approach to auditing	
Q26	Audit guidelines	Guidelines should include the requirement for a draft audit report to be provided to the business to allow comment/additional information to be provided prior to finalisation of the report and provision to GEDO	
N/A	Follow up comment/question	Are there going to be penalties for polluters who don't reduce their levels on GHG emissions, i.e. is there a push from government to continually tighten the levels of GHG emissions?	