

# DRAFT CLIMATE CHANGE STRATEGIC PLAN AND A DRAFT PLAN TO SAVE NSW ENERGY AND MONEY – SUBMISSION FORM

First name	Charlie
Surname	Prell
Organisation	Australian Wind Alliance
Type of organisation	Community advocacy group for wind energy. Our membership of around 800 includes farmers, wind workers and community energy groups.
Type of organisation (if other, please specify)	Click here to enter text.
Email	charlie@windalliance.org.au
Is this a confidential submission?	No [Note: All submissions will be published on our website unless confidentiality is specifically requested]
Would you like to be kept up to date with the development of action plans?	Yes, please keep me updated.

## Instructions

Thanks for taking the time to provide feedback on the [Draft Climate Change Fund Strategic Plan](#) and [A Draft Plan to Save NSW Energy and Money](#).

Please use this submission form template to comment on any of the specific potential actions in the draft two plans. There is a section at the end of the form where you can provide comment on the overall strategic approach we have taken.

We invite you to provide comment on each of the three priority investment areas in the *Draft Climate Change Fund Strategic Plan*. For each priority area, we are interested in:

- whether and how we should refine and deliver the potential actions identified
- whether there are other actions that should be considered to deliver the government's priority investment areas.

We have also asked more specific questions on the potential actions in *A Draft Plan to Save NSW Energy and Money*.

**Note: You do not need to complete all the fields in the form:** Feel free to comment on all of the potential actions, or only the ones you are most interested in.

The submission template is divided into four sections for targeted submissions:

1. Accelerating advanced energy
2. National leadership in energy efficiency (including *A Draft Plan to Save NSW Energy and Money*)
3. Preparing for a changing climate

4. General comments

Please upload your completed form online in Microsoft Word format [here](#). Submissions close at **5pm on 16 December 2016**.

## 1. Accelerating Advanced Energy

Please provide any comments on specific potential actions below:

Sections and potential actions	Questions	Responses
<p><b>2.1 Maximise investment under the national Renewable Energy Target</b></p> <ul style="list-style-type: none"> <li>investigate a competitive 'contracts for difference' funding model to guarantee a minimum price for output from up to 250 MW of new large scale renewable energy, providing benefits to local communities</li> <li>build on the New South Wales 50 MW solar power purchase agreement to expand PPAs to cover all of the renewable energy procurement commitment under the Government Resource Efficiency Policy</li> <li>support initiatives to make it easier for businesses, institutions and local government to buy electricity from renewable energy projects in New South Wales, such as WWF's 'Renewable Energy Buyers Forum'</li> <li>work with the COAG Energy Council to investigate minimum emissions performance standards for new power stations and the role of government in securing an orderly exit of the existing power station fleet</li> <li>advocate for stability and certainty in Commonwealth Government renewable energy policy</li> <li>sponsor energy market reforms to improve network</li> </ul>	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<ul style="list-style-type: none"> <li>- Achieving the "aspirational target" of zero net emissions by 2050 will require transformational action. A change of this magnitude needs to be legislated, not just aspired to, with a road-map of the steps required to achieve this target.</li> <li>- Federal government ambivalence towards renewable energy has caused an investment drought for large scale wind and solar in recent years. Only state-based actions in the ACT and Victoria have been sufficient to break this drought. The future shape of the federal RET remains unclear beyond 2020. NSW should legislate its own state-based Renewable Energy Target, underpinned by Contracts for Difference. This will ensure the state continues to attract ongoing investment, regardless of any ongoing uncertainty with the federal RET.</li> <li>- The Contract for Difference model can work alongside a federal RET as it stands or, in the worst case scenario, continue to drive wind and solar investment in its absence.</li> <li>- procurement of renewable energy for all government electricity usage should be expedited.</li> <li>- An emissions intensity scheme (EIS) for the electricity sector is well supported by business, research and peak bodies. It would incentivise an orderly closure of the state's old and polluting coal-burning power plants. It would be an effective complementary scheme to a state RET, and in time could transition to replace state and federal RETs as costs come down for wind and solar power. An EIS that lowers emissions intensity baselines quickly would be preferable to regulation.</li> <li>- The NSW government should be advocating for the adoption of this emissions intensity scheme at COAG.</li> <li>- The 'contracts for difference' that have been announced are an important first step, but need to be seen in this context. Approximately 6,000 megawatts of new</li> </ul>

<p>connection processes.</p>		<p>renewable generation is required to meet the RET target to 2020. As NSW accounts for around a third of total NEM demand, NSW should aim to facilitate the construction of at least 2,000 megawatts of new renewable capacity by 2020 to meet their share of the existing LRET. As NSW has built less under the RET than Victorian and South Australia, 2000 MW should be seen as the minimum required for NSW by 2020.</p> <ul style="list-style-type: none"> <li>- There needs to be a series of contracts to achieve this construction target. With REC prices at record highs, such contracts could return money to government in the early years. Consideration should be given to using these funds to drive further contracts to ensure the state reaches sufficient renewable energy capacity by 2020.</li> <li>- NSW is in a good position to capture the economic benefits from transitioning its economy to operate in a zero emissions environment.</li> </ul>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<ul style="list-style-type: none"> <li>- The planning, design, and construction of new renewable energy infrastructure (predominantly wind turbines) in NSW has generated an unacceptable level of anxiety in small regional communities. In September 2014 the NSW Govt released a report into the options for delivering ownership and benefit sharing models for wind farms. The report's findings are in danger of being ignored and should be incorporated into the new Planning Framework for Wind Farms in NSW. This Framework should be finalised and legislated as soon as possible. This will create a stable environment for investment which will attract much needed capital for wind farms in NSW.</li> </ul>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>The most beneficial ownership structure for new renewable energy infrastructure (both wind and solar) is to incorporate some portion of community ownership into the development. This is a legislated requirement in some countries in Europe, where the roll-out of renewables has been very rapid.</p> <p>Community ownership can be difficult and expensive to initiate. It needs to be supported with start-up funding and assistance in clearing the current roadblocks to connecting this generation to the electricity networks.</p>
<p><b>2.2 Attract investment in advanced energy demonstration projects</b></p> <ul style="list-style-type: none"> <li>• support research and demonstration projects for emerging advanced energy technologies that could</li> </ul>	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support</p>	<p>We already have the technologies required to meet NSW's share of the LRET to 2020. These technologies are wind turbines, solar thermal plants, and roof-top solar panels. The cost of these technologies is plummeting and will continue to do so. The best way to attract investment in these technologies is to provide a secure and stable market for the renewable energy generated.</p>

<p>provide flexible electricity generation</p> <ul style="list-style-type: none"> <li>support research and demonstration projects for renewable alternatives to natural gas and transport fuels in industrial applications, including concentrated solar thermal, biomass, electrification and hydrogen.</li> </ul>	<p>our advanced energy transition?</p>	<p>It will be critical for the target of zero net emissions by 2050 that any R&amp;D activity be directed only towards genuinely renewable sources of energy as incremental improvements to fossil fuel based energy such as coal and gas will be insufficient. Any money spent on research should be matched by spending on facilitating the roll-out of community owned projects across regional NSW.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p><a href="#">Click here to enter text.</a></p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p><a href="#">Click here to enter text.</a></p>
<p><b>2.3 Provide start-up funding to accelerate innovation in advanced energy</b></p> <ul style="list-style-type: none"> <li>work with established business incubators to provide dedicated programs for entrepreneurs and start-ups developing, demonstrating and deploying clean energy and supporting technologies and services</li> <li>sponsor energy innovation events to facilitate collaboration among universities, industry, government and investors</li> <li>develop tools to share information, connect collaborators and promote energy innovation in New South Wales</li> <li>monitor the development of technologies, community attitudes, price signals and share information to encourage investment and support market growth.</li> </ul>	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>There are number of (mostly volunteer) community groups working to develop community owned renewable energy projects in NSW. These groups are currently receiving little or no support from any level of government and there are lots of hurdles in front of them. In many cases these groups are the ones with the local knowledge needed to translate advanced energy projects to their own community context.</p> <p>The sharing of information between these groups is already occurring and should be encouraged and supported.</p> <p>This work has been done through the Office of Environment &amp; Heritage Renewable Energy Precinct program. We recommend continuation of this program.</p> <p>These groups have specific requirements for start-up funding and expertise and the Plan should seek to identify these needs and meet them.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p><a href="#">Click here to enter text.</a></p>

	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p><a href="#">Click here to enter text.</a></p>
<p><b>2.4 Put the New South Wales vehicle fleet on the path to doubling energy productivity</b></p> <ul style="list-style-type: none"> <li>• advocate for higher national fuel efficiency standards</li> <li>• investigate appropriate incentives to encourage the purchase of fuel efficient light vehicles and to retire inefficient vehicles, including through stamp duty and registration charges</li> <li>• provide the right 'real-world' information so that businesses and individuals can choose fuel efficient light and heavy vehicles</li> <li>• work with vehicle suppliers and clean energy providers to make zero emission and flexible fuel vehicles available to the New South Wales vehicle market</li> <li>• investigate and consider how the government could best invest in a fleet of electric vehicles, including for public transport, and charging infrastructure at government sites</li> <li>• investigate the case for public investment in electric vehicle charging infrastructure and the requirements for renewable energy power supply</li> <li>• review and extend the Green Truck Partnership approach to demonstrate new technologies for low-emissions light vehicles and freight (road, rail and other).</li> </ul>	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>In transitioning the vehicle fleet to electric vehicles, the potential opportunity for harnessing this distributed energy storage capacity should be kept in mind. A variety of start-up initiatives are providing a bridge between this storage resource and the 'grid'. This bridge will be important to provide grid flexibility for increased use of variable renewable energy supplies from wind and solar.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p>The use of words such as advocate, investigate, and review should be linked to the words action and implement. The NSW Government has been a laggard in the development and roll-out of renewable energy infrastructure. This situation needs to be addressed with some urgency.</p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p><a href="#">Click here to enter text.</a></p>

<p><b>2.5 Build capacity of local communities to deliver and own renewable energy</b></p> <ul style="list-style-type: none"> <li>• build capacity in councils in regional areas to provide advice to their communities on advanced energy</li> <li>• sponsor energy market and financial regulation reforms through COAG to make it easier for community scale projects to connect to the grid and share their benefits</li> <li>• help community energy groups to share knowledge and experience with financing and delivery models to get community energy projects off the ground</li> <li>• deliver connection guides and business case guides for sustainable energy community and residential projects</li> <li>• investigate the best ways to encourage developers to share the benefits of renewable energy projects with the local community.</li> </ul>	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Regional Councils are mostly incapable of providing the advice needed for a roll-out of community owned infrastructure. Any building of this capacity would be very welcome, and should be done on a regional basis.</p> <p>The move to make it easier for community scale projects to connect to the grid and to share their benefits is also very welcome, but needs to be supplemented by financial support.</p> <p>Given the significant logistical and financial requirements of any wind farm project, any form of community ownership is mostly likely to be facilitated by some form of community-developer partnership. These projects have particular requirements that need to be addressed.</p> <p><i>For further information, please refer to pp 3 - 5 of attached document: "AWA submission to the Victorian Department of Environment, Land, Water and Planning Discussion Paper on Community Renewable Energy Projects PiLoR and planning issues"</i></p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p>Click here to enter text.</p>
<p><b>2.6 Identify low-emissions pathways for emissions intensive sectors</b></p> <ul style="list-style-type: none"> <li>• partner with researchers and industry to identify and assess the potential for heavy industrial sites to reduce emissions</li> <li>• work with industry to share knowledge of</li> </ul>	<p>Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?</p>	<p>Beyond these measures, the most cost effective way to achieve this is to put a price on carbon that is high enough to achieve the desired changes in behaviour from heavy and light industry.</p> <p>NSW should advocate for this reform in COAG.</p>

emissions reduction technologies and practices based on a 'learning by doing' approach.	Are there particular issues we need to consider to ensure these actions are effective?	Click here to enter text.
	Are there other opportunities for advanced energy we should be encouraging?	Click here to enter text.
<b>2.7 Reduce emissions in NSW to support achievement of Commonwealth objectives</b> <ul style="list-style-type: none"> <li>Coal Innovation NSW continuing to support research into low emissions coal technologies and encouraging the development and implementation of these technologies, including investigating ways for coal mines to reduce their fugitive emissions, including via the Commonwealth Government's Emissions Reduction Fund</li> <li>strengthen emissions-performance requirements and monitoring in land-use planning and major project-planning approvals processes</li> <li>advocate for Commonwealth, COAG and international action consistent with the Paris Agreement</li> <li>advocate for improvements to Commonwealth policy and programs to address key emissions sources in New South Wales such as agricultural production systems and transport</li> <li>support primary industries, including farmers to save emissions or enhance carbon sequestration and attract funding from the Commonwealth Emission Reduction Fund.0000</li> </ul>	Do you have any comments on the actions we propose to fund through the Climate Change Fund to support our advanced energy transition?	<p>The vast majority of the money spent on "low-emissions coal technologies" is wasted. Instead of propping up the last-gasp for the coal industry this money should be spent on supporting the roll-out of existing renewables such as wind and solar, and large scale storage capacity such as grid-scale batteries and pumped hydro.</p> <p>The action to advocate for improvements to Commonwealth policies is very welcome. It should be supplemented by a statement that NSW will achieve these policy settings in the absence of any policy lead from the Commonwealth.</p>
	Are there particular issues we need to consider to ensure these actions are effective?	
	Are there other opportunities for advanced energy we should be encouraging?	Click here to enter text.
<b>2.8 Identify cost-effective pathways to reduce greenhouse gas emissions to achieve net zero</b> <ul style="list-style-type: none"> <li>model emissions pathways and their economic</li> </ul>	Do you have any comments on the actions we propose to fund through the Climate	Develop AND IMPLEMENT BY LEGISLATION a road-map to achieve net zero emissions as soon as possible. 2050 is 30 YEARS away. As the largest economy in Australia, NSW should be leading the way not lagging behind. California is a great

<p>impacts taking account of national and international carbon constraints and trends in both government policies and private sector action</p> <ul style="list-style-type: none"> <li>• monitor and predict the impact of current and new policy initiatives on the state's emissions performance</li> <li>• develop a plan for New South Wales to achieve net zero emissions.</li> </ul>	<p>Change Fund to support our advanced energy transition?</p>	<p>example of how to do this in the absence of any federal government leadership.</p>
	<p>Are there particular issues we need to consider to ensure these actions are effective?</p>	<p><a href="#">Click here to enter text.</a></p>
	<p>Are there other opportunities for advanced energy we should be encouraging?</p>	<p><a href="#">Click here to enter text.</a></p>