



Name: Origin Energy

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1. Reduce the cost of meeting carbon targets

1. What could be done to improve the cost-effectiveness and alignment of policies to reduce emissions across the industrial, electricity and transport sectors?

More consistent and efficient emissions signals would support coordinated, least cost economy, wide efforts to decarbonise. These signals can take the form of policy frameworks and there has been recent progress on this, e.g. the Commonwealth's imminent Net Zero Plan is expected to provide more guidance on the pace and scale of decarbonisation across the economy, as well as the contributions of each sector. All sectors of the economy will need to contribute to emission reduction goals if Australia is to reach net zero emissions. It will be crucial to implement policies for all sectors of the economy to enable them to make a significant and proportionate contribution to the emissions reduction task.

Alignment across jurisdictions can also be supported by frameworks like the Energy and Climate Change Ministerial Council's (ECMC) National Energy Transformation Partnership (NETP) and bilateral Renewable Energy Transformation Agreements (RETAs). The ECMC is also updating sector specific guidance, e.g. the Trajectory for Low Energy Buildings. We note Victoria and New South Wales are currently consulting on their emissions reduction policies to 2030 (NSW is also considering the 2035 and 2050 periods). Our expectation is that these policies will recognise that national frameworks were introduced after jurisdictions began their decarbonisation policy process and provide guidance on how their proposed strategies align and support the national framework. But it is challenging to comment on what more could be done until the Commonwealth and jurisdictional policies have been finalised.

We appreciate the Commission acknowledges there is ongoing action at all levels of government on climate and energy policy. We are concerned that the overlay of policies, regulations, reviews and consultations are not always clearly aligned which makes supporting customers to achieve their decarbonisation commitments more challenging. For example, the policy narrative can appear inconsistent to consumers when they are encouraged to invest in distributed assets for affordability and decarbonisation but also face network investment costs and potential curtailment, e.g. the solar emergency backstop mechanism, to manage the impact of these assets on the grid.

We also support the points made by the Commission in its submission to the National Electricity Market (NEM) Review that clear policy goals and targeted instruments for each goal will benefit the market and the long-term interest of consumers. However, we suggest that rather than introducing a whole new framework it would be better to build on existing policy and regulatory foundations to balance efficiency with the cost and complexity of dealing with broad changes. Once we have invested in supporting our customers to engage with frameworks to support their decarbonisation commitments it is easier to help them engage with changes to these frameworks than introduce them to a

whole new framework. Too many changes can make customers reticent to engage further in decarbonisation.

2. **Are there gaps in the emissions-reduction policies in the industrial, electricity and transport sectors which should be addressed?**

As the Commission's 2023 Productivity-enabling emissions reductions Inquiry report notes, consistent unit prices for the value of emissions reductions can support efficient and coordinated abatement paths. There has also been some progress on this, e.g. the ECMC has established an interim methodology for the value of emissions reductions (VER) to provide a consistent value to be reflected in national energy regulatory reforms. ECMC have committed to developing an enduring VER methodology for the energy sector, although the complexity of this has led to the application of the interim VER being extended. This value could also be used to support consistency across energy policies and programs, and potentially across different sectors.

The end of the Renewable Energy Target framework in 2030 also means the end of established targets and mandatory use of large-scale generation certificates (LGCs) and small-scale technology certificates (STCs) to meet these targets. While the voluntary renewable energy guarantee of origin (REGO) certificate scheme has been introduced to replace LGCs and STCs, the loss of the clear target for the industry and regulatory requirement to participate in these schemes may result in more fragmentation in expectations and efforts across jurisdictions. Although the NEM Review may provide an alternative mechanism to provide an emissions signal for electricity in support of achieving the National Electricity Objectives, which now includes an emissions component.

3. **Are there any duplicative emissions-reduction policies in the industrial, electricity and transport sectors which could be streamlined?**

Emissions related reporting could be more streamlined to support simpler, more cost-effective efforts to understand and embrace opportunities to decarbonise across sectors. Currently there are a plethora of reporting requirements, e.g. under the National Greenhouse and Energy Reporting Scheme (NGERS), Safeguard Mechanism, and Climate-related financial disclosures mandates. These frameworks do not always align with each other, e.g. NGERS methods will not be consistently recognised and allowed across all elements of a business' operations under the proposed climate-related financial disclosure mandates. We recognise governments have been working to update each scheme to align with international best practice and commend these efforts. But navigating these changes and potential inconsistencies between different frameworks can increase the cost and complexity of compliance.

Similarly, certificate schemes for renewable electricity, renewable gases, and clean products to support and value decarbonisation efforts could be streamlined with each other and the emissions related reporting frameworks. We welcome efforts by governments to create certificates to recognise and value the contributions these products and services make towards reducing emissions. But we query whether multiple certificate schemes across jurisdictions are required and whether registration and accreditation through these schemes could make better use of existing measurement, reporting and verification.

2. Speed up approvals for new energy infrastructure

1. Are planning and approvals processes for large energy infrastructure taking too long? If so, what causes the most delay?

We consider that there is scope to streamline planning and approvals processes for large energy infrastructure to promote timely assessments.

One of the main sources of these delays is duplication of effort and process between state-based land use planning assessments and the Commonwealth's Environment Protection and Biodiversity Conservation Act (EPBC). These state processes are required to consider all of the provisions of the EPBC legislation, in addition to that jurisdiction's additional environmental controls. But there is no recognition of this assessment in the subsequent Commonwealth process. This duplication delays the delivery of critical energy infrastructure and increases costs.

Origin has previously supported efforts to refine Commonwealth environmental approvals processes (EPBC) to deliver faster and more efficient decision-making which provides certainty and de-risks investment, while ensuring better protection for the environment.

Additionally, the ACCC has cited delays to regulatory approvals as one of the drivers of a reduction in forecast gas production in its Gas inquiry March 2025 interim report. Challenges meeting gas demand (and associated scarcity pricing) are of increasing concern to consumers, industry, regulators, and governments. Given the role of gas in supporting the transition to Net Zero, it is important consideration is given to how best to ensure timely, but responsible development of resources.

2. How can planning and approvals processes be sped up without unduly compromising regulatory standards?

Origin considers simplifying and streamlining the EPBC environmental assessment processes could help speed them up, without unduly compromising regulatory standards.

For example, jurisdictions could work with the Commonwealth to codify a bilateral EPBC assessment process so that projects are only reviewed against these requirements once. This will not reduce the standard projects are expected to comply with but will reduce duplication of effort and the potential for differing conclusions to be reached. The Commonwealth could choose to allow a separate referral under the EPBC Act under exceptional circumstances and provide clear guidance on what would be required for this to occur.

Additionally, timely assessments could be supported by prescribed timelines for each step of any new approvals process. This could include setting the timeframe within which the relevant organisation would be required to check and accept an application before publishing it. This could be accompanied by a clearly defined framework around how the applications will be validated. Clear timeframes throughout the process, including at the validation stage, would reduce uncertainty around the length of approvals and promote timely project delivery.

3. Should clean energy projects be treated differently to other projects for the purpose of environmental and other approvals? If so, how?

Origin notes the ECMC has already developed a national renewable energy priority list to provide coordinated support for regulatory planning and environmental approval processes for identified priority renewable energy projects across Australia. We also note that there are existing guidelines specific to clean energy projects for the purpose of planning and environmental approvals.

4. What can be done to build local community support for new energy infrastructure projects?

There are already a number of efforts to build local community support for new energy infrastructure projects, including through transmission frameworks and renewable energy zone (REZ) frameworks. The developer rating scheme developed in response to the outcomes of the Australian Energy Infrastructure Commissioner's (AEIC) Community Engagement Review will also provide guidance on building community support. These efforts are still in the design and implementation phase so it is too soon to consider modifications or alternative approaches.

Energy companies have also provided guidance on their approach to working with communities and ensuring they support the transition. For example, Origin's 2022 Climate Transition Action Plan (CTAP) includes a commitment to getting energy right for our customers, communities and plant. This includes supporting communities through this major period of change for our sector, as well as considering affordability and reliability of energy supply, to ensure a just transition to net zero by 2050.

5. Please outline any evidence showing the productivity benefits of faster approvals for energy projects.

Faster approvals for energy products will support the delivery of the significant investment in energy infrastructure at the pace and scale required to support targeted emissions reductions across the economy.

3. Encourage adaptation by addressing barriers to private investment

1. What are the barriers and enablers impacting decisions by owner-occupiers, landlords and developers about how housing is built and updated over time so that it is resilient to the effects of climate change?

The participant did not respond to this question.

2. What information do people need to make decisions about where to live, how to build and how to upgrade their homes to appropriately factor in climate change?

The participant did not respond to this question.

3. What are the most cost-effective retrofitting options for improving the resilience of Australia's existing housing stock? What are their costs and benefits?

The participant did not respond to this question.

4. What role might minimum standards play in ensuring the resilience of Australia's housing stock?

The participant did not respond to this question.

5. The impacts of climate change are being factored into the regulation of where and how houses are built in different ways around Australia. What does leading practice look like? Where is there room for improvement? Are there lessons we can learn from other countries?

The participant did not respond to this question.