



7 February 2023

Mr David Fredericks PSM
Secretary
The Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601

netp@industry.gov.au

Dear Mr Fredericks

Consultation on proposed legislative changes to incorporate an emissions reduction objective into the national energy objectives

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) in response to the *Consultation paper – Incorporating an emissions reduction objective into the national energy objectives*.

This submission is provided by Energy Queensland on behalf of its related entities:

- Distribution network service providers, Energex Limited and Ergon Energy Corporation Limited;
- Retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail); and
- Affiliated contestable business, Yurika Pty Ltd and its subsidiaries, including Yurika Metering.

Energy Queensland supports incorporating an emissions reduction component in the national energy objectives. We note this reform will support the delivery of Queensland Government initiatives, in particular the Queensland Energy and Jobs Plan, as part of the wider energy transformation occurring across Australia.

Energy Queensland also supports how the proposed amendments will introduce emissions reductions targets as an additional consideration alongside price, quality, safety, reliability and security of supply. This will ensure due consideration is given to the costs and benefits of decarbonisation as part of existing decision-making processes.

In our view, some aspects of the proposed changes will benefit from clarification, such as the emissions reduction targets that will be taken into consideration, the extent to which electricity and gas are considered in a more integrated way, the degree of

discretion that would be afforded to market bodies around the transitional arrangements, and how they would exercise their discretion.

We note that practical implementation of revised national energy objectives will require promulgation through changes to the National Electricity Rules, National Energy Retail Rules, and supporting instruments and guidelines. Energy Queensland seeks further information from DCCEEW on the timelines and processes required for practical implementation. We also look forward to engaging with the market bodies on those additional changes once Energy Ministers make their decision and the Parliament of South Australia considers the legislation.

Energy Queensland's further views on these issues are included in the more detailed responses to specific questions posed by DCCEEW in the enclosed submissions template. Neither this cover letter nor our detailed responses to questions contain confidential information.

Should DCCEEW require additional information or wish to discuss any aspect of this submission, please contact either myself, or Andrew Bozin on 0436 447 814.

Yours sincerely



Alena Christmas
Acting Manager Regulation

Telephone: 0429 394 855
Email: alena.christmas@energyq.com.au

Encl: Energy Queensland comments to consultation questions