

*Submission in response to the 2012 Renewable Energy Target review Issues Paper*  
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*Date received: 16 September 2012*

I believe the overall scheme should be maintained. Promoting renewable energy is an important aim in itself but also crucial as a bulwark against backsliding on emissions targets.

It is appropriate that the SRES is an 'uncapped' scheme in that its annual targets are based on the number of certificates expected to be created. 'Liability therefore tracks certificate creation, rather than placing a limit on it.' This should be kept so that ordinary citizens' contributions are genuinely additional to mandated targets. It is important for ordinary people to feel they can 'make a difference'. A zero sum undermines this and would lead to disillusionment and despondency among people trying to 'do their bit'.

Similarly, voluntary actions such as 'GreenPower' purchases should remain additional and should also be translated into a certain amount of emissions abatement and be additional also to the greenhouse gas reductions targets.

Target should continue to rise on similar trajectory after 2020. 20% by 2020 is an arbitrary, modest target and 40% is easily achievable without major changes to the way electricity supply is managed.

The shortfall charge should be as it is determined now or sufficient to exceed the cost of surrendering LGCs, whichever would be the larger penalty in any year. It should never be cheaper to pay the penalty and avoid the obligation to surrender the correct number of certificates.

The separation of the small scale scheme is valuable so that 'solarcoaster' variations in uptake of domestic scale PV doesn't interfere with the steady uptake of large scale solar. The uncapped nature of the SRES is appropriate because ordinary people need to know their personal investment in renewable energy is genuinely additional to any large scale targets.

Displacement technologies should be supported under another scheme promoting energy efficiency, again because sticking strictly to generation would support confidence and support for the scheme.

Deeming is appropriate for SRES to help but solar credits multiplier are silly and unhelpful. Certificates should be real so as to not undermine confidence in the scheme. Similarly, the RET should be technology neutral (other than the small/large distinction) and avoid multipliers that discourage confidence lead to undermining terms like 'phantom RECs'.

Two year reviews seems a sensible compromise between being responsive and providing confidence.