



Australian Government
Department of Climate Change, Energy the Environment and Water
Clean Energy Regulator

COST RECOVERY IMPLEMENTATION STATEMENT

Guarantee of Origin Scheme

FY2025-2026

Charging for regulatory activity involves government entities charging individuals or organisations in the non-government sector some or all of the minimum efficient costs of a specific government activity. The Cost Recovery Policy along with the Australian Government Charging Framework (the Charging Framework) sets out the policy under which government entities design, implement and review charging for regulatory activities. The Cost Recovery Implementation Statement is the public document to ensure the transparency and accountability for the level of the charging and to demonstrate that the purpose for charging, as decided by Government, is being achieved.

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1. INTRODUCTION

1.1. Purpose

This Cost Recovery Implementation Statement (CRIS) outlines how the Clean Energy Regulator (CER) intends to implement cost recovery charging for the administration and regulation of Renewable Electricity Guarantee of Origin (REGO) and Product Guarantee of Origin (PGO) certificates, as required by government policy, under the *Future Made in Australia (Guarantee of Origin) Act 2024* (the GO Act), the *Future Made in Australia (Guarantee of Origin Charges) Act 2024* (the GO Levies Act) and associated regulations. It reports forecast financial and non-financial performance information for REGO and PGO and contains financial and demand forecasts for Financial Year (FY)2025-26 and 3 forward years. The CER will maintain the CRIS until the activity has been discontinued and will review the CRIS periodically.

The Guarantee of Origin (GO) scheme is a voluntary, internationally aligned assurance scheme being developed to track and verify emissions associated with hydrogen, renewable electricity and other products such as metals and low emissions fuels made in Australia. GO certificates will show where a product has come from, how it was made, and the emissions throughout its lifecycle. They will help participating sellers transparently communicate the attributes of low-emissions products to domestic and international consumers.

The costs outlined in this CRIS cover the expected CER costs for operation of the GO scheme at the time it is fully operational. Proposed pricing reflects amounts required to recover costs, incorporating consideration of government policy including waivers on charges.¹ Participants of the scheme will be responsible for paying associated charges.

Due to anticipated overlap of scheme participants for the Renewable Energy Target (RET) and REGO scheme, it is proposed that REGO cost recovery pricing will be broadly set to align with RET cost recovery pricing. For the PGO scheme, we propose to recover costs to register a person from scheme commencement, but to defer all other charges (shown later in this CRIS) for an initial period of 2 years. This initial deferral provides temporary assistance to nascent industries in the initial years of the scheme. It will also enable the CER to improve its cost estimates by informing these with actual early scheme data. Waivers for PGO will be phased out and charges will be introduced over time to achieve full cost recovery as shown in the table on page 9 below. The regular review of the CRIS will provide opportunities for stakeholder feedback and ensure charging arrangements remain appropriate.

1.2. The Guarantee of Origin (GO) scheme

The GO scheme will certify a range of products, certified by either PGO certificates, or for renewable electricity, certified with REGO certificates. An explanation of the PGO and REGO certificate mechanisms is outlined below. More information on the operation of the GO scheme is available on the CER website (<https://cer.gov.au/schemes/guarantee-origin>) and the Department of Climate Change, Energy, Environment and Water (DCCEEW) website (<https://www.dccceew.gov.au/energy/renewable/guarantee-of-origin-scheme>).

¹ Unless explicitly stated otherwise, the use of 'charges' denotes the collective noun for fees and/or levies.

PGO certificates

The PGO scheme is a product-based emissions accounting framework that will measure and track emissions and associated information for products across the supply chain. GO scheme legislation will set out different ‘methodologies’ for PGO-certifiable products that specify how emissions for that product must be measured and reported. Hydrogen will be the first product methodology eligible for PGO certification, with the scheme expected to expand over time to certify more products including metals, low carbon fuels, and biomethane. Development of PGO methodologies will be led by DCCEEW.

Participants in the PGO scheme will register ‘profiles’ that carry information about the different stages of the product’s lifecycle. Production profiles contain information about the production process of the product, delivery profiles carry information on how the product reached the end consumer, and consumption profiles are registered by entities that wish to claim the use of a PGO-certified product.

Once profiles are registered, they can be used to create PGO certificates (production profiles) or add information to existing PGO certificates (delivery and consumption profiles). Each PGO certificate will certify a functional unit of product. The functional unit of a PGO certificate will vary based on product – for example, each hydrogen GO certificate is proposed to represent 1 kg of hydrogen. Functional units for future PGO products will be consulted on through the relevant methodology development process led by DCCEEW.

The PGO scheme will lay the groundwork for policies to drive investment in low carbon industries and help Australia shape the global markets for low emissions products. PGO certificates will provide a central mechanism to verify eligibility for Government incentive programs in these sectors, including the \$4 billion Hydrogen Headstart program and the \$6.7 billion Hydrogen Production Tax Incentive.

REGO certificates

The REGO certification mechanism will certify renewable electricity produced from eligible renewable electricity sources. It builds on the large-scale generation certificate (LGC) framework under the RET and expands certification eligibility to energy storage and ‘below-baseline’ renewable electricity, generated by power stations that existed pre-1997. A REGO certificate will certify 1 MWh of electricity. REGO certificates will also be able to be ‘time-stamped’ down to an hourly level, increasing the level of transparency for renewable electricity claims and supporting the evolution of the renewable energy market. When rules are made in the future, the REGO scheme will also certify aggregated small-scale systems, allowing nearly all renewable electricity to be tracked, verified and claimed through REGO certificates.

REGO will provide certainty for renewable electricity investment and procurement and support Australia’s energy transformation. It can underpin renewable electricity claims for corporate renewable energy or emissions reduction commitments, or as evidence of renewable inputs for PGO certification.

2. POLICY AND STATUTORY AUTHORITY TO CHARGE (COST RECOVER)

2.1. Government policy approval to charge for this regulatory activity

In September 2023, the Australian Government released a consultation discussion paper on the proposed Guarantee of Origin (GO) Scheme and invited submissions on the proposed design. The paper flagged the Government's intention to charge fees and annual levies to recover costs.

In November 2024, the Australian Government passed the GO Act and the GO Levies Act. The Explanatory Memorandum of the GO Levies Act states that cost recovery will be used to ensure the Australian Government (including the Clean Energy Regulator) is appropriately resourced to effectively and efficiently regulate the scheme.

The legislative framework permits costs to be recovered through fees (payments for a service provided to the payer) and levies (payments for services provided to a broad cohort of scheme participants). In the GO scheme, an example of a service attracting a fee is registering a facility under the scheme and an example of services covered under the levy include scheme participant education activities.

The fees and levies have been designed in line with the requirements set out by the Department of Finance in the Australian Government Charging Framework². The implementation approach of cost recovery for the scheme is outlined below.

2.2. Statutory authority to charge

The GO Act establishes a regulatory framework to enable the administration of the GO scheme including the mechanisms to issue PGO and REGO certificates. The GO Act provides that costs associated with the Regulator's functions under the legislative framework will be recovered through a combination of cost recovery fees and levies. The GO Act also permits the Regulator to remit or refund charges.

The legal authority to impose a GO levy is contained in Part 2 of the GO Levies Act. The amounts will be prescribed in the Regulations which will be established before scheme launch. The legal authority to prescribe application fees can be found in section 117 of the GO Act. The fees will be prescribed in the Rules which will be established prior to scheme launch.

While the GO scheme will operate on a cost recovery basis, it is not designed to generate revenue above costs incurred by the Commonwealth Government for regulating the GO scheme.

3. CHARGING (COST RECOVERY) MODEL

3.1. Costs of the regulatory activity

The GO cost model has been developed in line with the Australian Government Charging Framework which promotes consistent, transparent and accountable charging for government activities. The table below provides a cost breakdown for the GO Scheme (REGO and PGO). The direct, indirect and ICT

² Available at: <https://www.finance.gov.au/government/managing-commonwealth-resources/implementing-charging-framework-rmg-302/australian-government-charging-policy>

costs reflect the anticipated expenses required to run this scheme as a whole, when it is fully operational.

TABLE 1: ESTIMATED COSTS OF GO SCHEME REGULATORY ACTIVITIES

	Direct costs	Indirect costs	ICT Costs
REGO			
Registration of person	\$77,347	\$22,163	\$128,631
Registration of facility	\$102,496	\$13,558	\$78,692
Certificate registration	\$454,978	\$312,106	\$1,811,427
Total	\$634,820	\$347,827	\$2,018,750
PGO			
Registration of person	\$6,524	\$0	\$0
Registration of profiles			
Production	\$40,075	\$0	\$0
Delivery	\$25,619	\$0	\$0
Consumption	\$25,619	\$0	\$0
Certificate registration	\$7,102,953	\$968,693	\$3,083,645
Addition of consumption information	\$566,824	\$770,429	\$2,972,604
Total	\$7,754,702	\$1,739,136	\$6,056,287

3.2. Design of the regulatory charge

The GO scheme will certify a range of products, certified by PGO or REGO certificates. Costs from administering different types of PGO certificates for different products – for example, hydrogen, sustainable aviation fuel, or biomethane – as well as REGO certificates, are all expected to differ due to the different nature of the industries. As such, costs have been modelled on a product-by-product basis, and prices set accordingly. Where products produced via different GO methods are sufficiently similar in complexity and cost – such as for hydrogen by electrolysis and hydrogen by liquefaction, the CER will align prices.

The cost modelling that underpins the Guarantee of Origin Scheme incorporates:

- Outputs and business processes of the activities
- Measuring and assigning direct costs
- Allocation of indirect and ICT costs
- Tracking the alignment of revenue to expenses

The model, which is aligned to the Australian Government Charging Framework, ensures the CER understands the costs required to implement the GO scheme in an efficient manner.

Renewable Electricity Guarantee of Origin (REGO) cost recovery policy

To smooth the introduction of the REGO scheme it is proposed that REGO cost recovery pricing is broadly set to align with RET cost recovery pricing. The exception to this is 'Registration of a Person'

which will align with PGO pricing – see below at ‘Product Guarantee of Origin (PGO) cost recovery policy’ for further explanation.

The RET and REGO schemes will co-exist until the RET ends in 2030 and are likely to have significant overlap in participants and registered power stations. Eligible renewable electricity facilities can be registered under both schemes simultaneously but can only certify a MWh of electricity under either the LRET or REGO. That is, those eligible facilities can be registered under both schemes but cannot ‘double certify’ generation. Participants and facilities seeking to register and participate in REGO (in addition to RET) will need to pay all relevant REGO fees and levies.

REGO cost recovery arrangements will be subject to ongoing review and pricing and may be adjusted over time, once the scheme is established. Future deviations from RET cost recovery arrangements may emerge, noting the RET scheme is only partially cost recovered whereas GO is intended to be fully cost recovered by FY 2031-32. This means that GO will include an annual levy, that has not been present in the RET cost recovery framework, to permit the recovery of broad-base scheme costs.

Scheme costs that will be recovered for the REGO scheme include:

- Fee for registration of a person as a GO scheme participant
- Fee for registration of renewable electricity facilities
- Fee for registration of a REGO certificate
- An annual levy to recover broad-based costs for scheme administration such as education and system maintenance.

REGO fees and levies for FY 2025-26 are set out in Table 2 below. The amounts payable are set out under ‘Charges (with waivers)’, which accounts for the waivers applied to align REGO fees and levies with RET fees.

TABLE 2: REGO FEE AND LEVY SCHEDULE FY 2025-26

REGO charging points	Type	Charges	Charges (with waivers)
Registration of person	Fee	\$1,950	\$490
Registration of facility			
Registration of electricity generation systems			
Small <10MW	Fee	\$1,650	\$50
Medium 10 - 25 MW	Fee	\$1,650	\$200
Large >25MW	Fee	\$1,650	\$1,000
Registration of energy storage systems	Fee	\$1,650	\$1,429
Registration of aggregated systems	Fee	\$1,650	\$1,429
Certificate registration	Fee	\$0.09	\$0.08
Annual Levy	Levy	\$1,014	\$0

Product Guarantee of Origin (PGO) cost recovery phasing

As outlined above, the PGO scheme will certify a range of different products, expanding over time. Costs associated with administering different products will differ due to the varying nature of different product industries, and the difference in the functional unit of each PGO certificate type – this is reflected in the separate costs and prices modelled for the different PGO products.

One class of producers that benefit from PGO certification are low-emissions products. These low-emissions product industries are generally nascent or not yet mature. We propose to recover costs to register a person from scheme commencement, but to defer the other charges shown in this CRIS for an initial period of 2 years. It is our intention to apply charges after this 2-year deferral period, with a percentage discount applied that declines over time, transitioning to full cost recovery by FY 2031-32 – see Table 3. The waiver amount will depend on the year in which the relevant PGO methodology is made, with newer methodologies receiving a larger discount to reflect nascency.

- Waivers will be applied to annual levies for holding a production profile for a production pathway.
- Waivers will be applied to all the fee bearing activities requested by the holder of that production profile.

Waivers would not apply to the Registration of Persons fee as this activity is common to all GO participants.

The initial deferral of most charges for 2 years provides temporary assistance to nascent industries in the initial years of the scheme. General application of waivers is consistent with feedback from previous stakeholder engagement in December 2022 (see section 5) and consultation on the draft CRIS in mid-2025. While many who responded to the 2022 consultation expressed broad agreement with the proposed cost recovery measures, almost half of those noted that cost recovery should be dependent on industry maturity and adjusted over time. Further, the initial deferral of most charges for 2 years will also enable the CER to improve its cost estimates by informing these with actual early scheme data on costs and updated estimates of production volumes and scheme participation as these industries mature.

Estimating the number of likely participants in the scheme and the volumes of production, particularly for nascent industries, can be subject to reasonably high degrees of uncertainty. The CER has developed estimates by drawing on a range of publicly available information on proposed projects listed at Appendix 1. Updated and revised estimates and future charging arrangements would be considered as part of the periodic review of the CRIS.

The Product GO cost recovery phasing structure from scheme commencement until the end of the 2030-31 financial year is set out in Table 3 below:

TABLE 3: PRODUCT GO COST RECOVERY PHASE-IN WAIVER STRUCTURE

<i>Determination made in</i>	<i>Waiver amount per year (for PGO only)</i>					
	Product A	Product B	Product C	Product D	Product E	Product F
FY 2025-26	100%					
FY 2026-27	100%	100%				
FY 2027-28	90%	90%	90%			
FY 2028-29	75%	75%	75%	90%		
FY 2029-30	60%	60%	60%	75%	90%	
FY 2030-31	30%	30%	45%	60%	75%	90%
FY 2031-32	0%	0%	0%	0%	0%	0%

Table 3 sets out the percentage of cost recovery fees and levies that will be waived for profiles and certificates registered under a given PGO methodology in each financial year out to FY 2031-32. The size of the waiver depends on the year in which the relevant PGO methodology commenced, not the year in which the project is registered. As an example, Product B represents a PGO methodology that is legislated and commences in FY 2026-27. As shown in the 'Product B' column, fees and levies for profiles and certificates registered under Product B will be fully waived in FY 2026-27, receive a 90% waiver in FY 2027-28, and so on. A new project registering under the Product B PGO methodology in FY 2029-30 will have a 60% waiver applied in that year to their fees and levies.

Once cost recovery commences after the full waiver period between FY 2025-26 FY and FY 2026-27, prices are proposed to be discounted to support a smooth transition to payment of costs for nascent industries certified by PGO.

PGO cost recovery arrangements will be subject to ongoing review and pricing and may be adjusted over time. Scheme costs that are proposed to be recovered for the PGO scheme include:

- Fee for registration of a person as a GO scheme participant
- Fee for registration of profiles (production, delivery and consumption)
- Fee for registration of a PGO certificate
- Fee for addition of consumption information to consume a PGO certificate
- An annual levy to recover broad-based costs for scheme administration such as education and system maintenance.

There are 8 PGO products intended to be eligible for certification under the GO scheme within the first financial year of scheme operation: hydrogen (electrolysis, steam methane reforming and liquefaction), iron ore, aluminium, biomethane, sustainable aviation fuel (SAF) and renewable diesel. Proposed costs and prices (inclusive of waivers) for each product for 2025-26 are outlined below, with complete methodologies for the products to be developed and consulted on by DCCEEW in the coming months. The proposed schedule for the near-term expansion of the GO scheme is available in Annex 1 to the Future Made in Australia (Guarantee of Origin) Methodology Determination 2025 – Explanatory Document published on the DCCEEW website for consultation in June 2025 (<https://consult.dcceew.gov.au/>).

Proposed functional units for each PGO certificate type are included for reference, noting final policy settings on functional units will occur through the development and consultation process for future methodologies. It is expected that any change in the functional unit will impact unit prices, but not overall costs because regulatory effort to the CER is broadly based on the number of applications received and amount of product seeking certification, which are unaffected by the choice of functional unit. For example, if a producer produces 1 tonne of aluminium and the functional unit is set as 1 kg, they will receive 1000 PGO certificates. If the functional unit is 1 tonne instead, they would receive 1 PGO certificate, however the amount of aluminium produced is still the same. The overall costs to CER of assessing this application would not change in either scenario since the functional unit does not change the regulatory activities CER would need to undertake; therefore, the functional unit will only affect the unit price.

Noting that further information on product methodologies may elicit further feedback on the proposed pricing arrangements, the CRIS will be periodically reviewed and additional feedback considered in those revisions.

Tables 4-7 below set out fees and levies for PGO methodologies in FY 2025-26. The amounts payable are set out under 'Charges (with waivers)', which incorporates waivers applied in accordance with the schedule in Table 3 above.

TABLE 4: PGO HYDROGEN FEE AND LEVY SCHEDULE FY 2025-26

PGO charging points	Type	Charges ³	Charges (with waivers)
PGO - Hydrogen by Electrolysis (Assumed functional unit: 1 kg)			
Registration of person	Fee	\$490	\$490
Registration of profiles			
Production	Fee	\$2,647	\$0
Delivery	Fee	\$1,323	\$0
Consumption	Fee	\$1,323	\$0
Certificate registration	Fee	\$0.0021	\$0
Addition of consumption information	Fee	\$0.0012	\$0
Annual Levy	Levy	\$8,166	\$0
PGO - Hydrogen by SMR (Assumed functional unit: 1 kg)			
Registration of person	Fee	\$490	\$490
Registration of profiles			
Production	Fee	\$721	\$0
Delivery	Fee	\$361	\$0
Consumption	Fee	\$361	\$0
Certificate registration	Fee	\$0.019	\$0
Addition of consumption information	Fee	\$0.014	\$0
Annual Levy	Levy	\$8,166	\$0
PGO - Hydrogen by Liquefaction (Assumed functional unit: 1 kg)			

³ The average charge is calculated by dividing the efficient cost over the expected volumes of activities i.e. registrations, certificates etc.

PGO charging points	Type	Charges ³	Charges (with waivers)
Registration of person	Fee	N/A ⁴	\$490
Registration of profiles			
Production	Fee	N/A ⁴	\$0
Delivery	Fee	N/A ⁴	\$0
Consumption	Fee	N/A ⁴	\$0
Certificate registration	Fee	N/A ⁴	\$0
Addition of consumption information	Fee	N/A ⁴	\$0
Annual Levy	Levy	N/A ⁴	\$0

TABLE 5: PGO METALS FEE AND LEVY SCHEDULE FY 2025-26

PGO charging points	Type	Charges	Charges (with discount)
PGO – Iron Ore (Assumed functional unit: 1 t)			
Registration of person	Fee	\$490	\$490
Registration of profiles			
Production	Fee	\$3,219	\$0
Delivery	Fee	\$838	\$0
Consumption	Fee	\$838	\$0
Certificate registration	Fee	\$0.0039	\$0
Addition of consumption information	Fee	\$0.014	\$0
Annual Levy	Levy	\$8,166	\$0
PGO – Aluminium (Assumed functional unit: 1 t)			
Registration of person	Fee	\$490	\$490
Registration of profiles			
Production	Fee	\$2,162	\$0
Delivery	Fee	\$433	\$0
Consumption	Fee	\$433	\$0
Certificate registration	Fee	\$1.0	\$0
Addition of consumption information	Fee	\$0.40	\$0
Annual Levy	Levy	\$8,166	\$0

TABLE 6: PGO BIOMETHANE FEE AND LEVY SCHEDULE FY 2025-26

PGO charging points	Type	Charges	Charges (with discount)
PGO – Biomethane (Assumed functional unit: 1 kg)			
Registration of person	Fee	\$490	\$490

⁴ Over the modelled period, the volume forecast for hydrogen by liquefaction is zero. As such, costs could not be reliably estimated over this period and are reported here as 'N/A'. Pricing for hydrogen by liquefaction is proposed to align with hydrogen by electrolysis due to similarity in the product and anticipated complexity.

PGO charging points	Type	Charges	Charges (with discount)
Registration of profiles			
Production	Fee	\$905	\$0
Delivery	Fee	\$453	\$0
Consumption	Fee	\$453	\$0
Certificate registration	Fee	\$0.036	\$0
Addition of consumption information	Fee	\$0.014	\$0
Annual Levy	Levy	\$8,166	\$0

TABLE 7: PGO LOW CARBON LIQUID FUELS FEE AND LEVY SCHEDULE FY 2025-26

PGO charging points	Type	Charges	Charges (with discount)
PGO – SAF via hydro processed esters and fatty acids (HEFA) (Assumed functional unit: 1 L)			
Registration of person	Fee	\$490	\$490
Registration of profiles			
Production	Fee	\$3,708	\$0
Delivery	Fee	\$1,854	\$0
Consumption	Fee	\$1,854	\$0
Certificate registration	Fee	\$0.0041	\$0
Addition of consumption information	Fee	\$0.0021	\$0
Annual Levy	Levy	\$8,166	\$0
PGO – Renewable diesel hydrotreating (Assumed functional unit: 1 L)			
Registration of person	Fee	\$490	\$490
Registration of profiles			
Production	Fee	\$3,708	\$0
Delivery	Fee	\$1,854	\$0
Consumption	Fee	\$1,854	\$0
Certificate registration	Fee	\$0.0070	\$0
Addition of consumption information	Fee	\$0.0029	\$0
Annual Levy	Levy	\$8,166	\$0

4. RISK ASSESSMENT

The Clean Energy Regulator has agreed a medium risk with the Department of Finance under the Charging Risk Assessment criteria. The CER has developed strategies to mitigate identified risks which include:

- Stakeholders having the opportunity to provide feedback on the proposed GO fees and levies during consultation on the draft CRIS
- The waivers applied to PGO reducing barriers to participation for nascent industries

- Aligning REGO and RET pricing during the period that both schemes are operational, which will assist with the transition from RET to REGO
- Ongoing monitoring and periodic review of the CRIS, with opportunity for stakeholder feedback on the impacts of fees and levies at that time.

5. STAKEHOLDER ENGAGEMENT

5.1. Consultation on the draft GO CRIS

Public consultation on the CRIS occurred from 23 June 2025 to 18 July 2025. Three webinars were held during the consultation period to assist stakeholders' understanding of the proposed cost recovery arrangements for GO and provide an opportunity for questions. In total, 430 stakeholders attended the webinars, with representation from a range of stakeholders from relevant industries across the hydrogen, renewable electricity and low-carbon product sectors. The CRIS consultation received 13 submissions. Non-confidential submissions have been published.

Overall, there was broad support for the GO scheme to be cost recovered through the proposed cost recovery arrangements to ensure long-term sustainability of the scheme. Ten submissions noted support for the phased approach to PGO and REGO cost recovery.

A range of stakeholder feedback was provided on the design of waivers, fees and levies. These will be considered in subsequent reviews of the CRIS once the scheme has commenced.

- Four submissions suggested that the proposed 2-year deferral on recovering costs for nascent PGO industries should be considered for extension until the industries reach scale.
- Two submissions suggested that a single levy could be applied to co-located facilities producing multiple GO products.
- Two submissions expressed a preference for cost recovery to be weighted toward certificate fees over annual facility levies to reduce fixed costs and charge based on participation.
- One submission suggested pre-existing accredited power stations could be subject to a different registration fee.

Several stakeholders noted that certainty on future pricing arrangements would assist business decision making. The CER appreciates the desire for clarity on future prices, however, uncertainty in future scheme cost estimates limits the utility of presenting future prices in the 2025-26 GO CRIS. The periodic cost recovery review process will provide for regular updates of proposed pricing and public consultation on proposals to revise cost recovery arrangements.

Respondents also requested further clarity on how waivers will be applied, whether refunds can occur and whether the functional unit used in the CRIS is final. The CRIS was amended to provide additional clarity on these issues, and feedback on functional units has been passed to DCCEW for policymaking consideration.

The CER has noted all other feedback, which will be considered in the CRIS review process.

5.2. Summary of past consultation on GO cost recovery

As part of a wider consultation on the Guarantee of Origin, DCCEEW consulted on the policy position that the GO scheme would be cost recovered in line with Australian Government cost recovery policy in December 2022.

Responses from the December 2022 consultation were received from 81 organisations and individuals with broad representation from both PGO and REGO stakeholders across prospective scheme participants and industry bodies.

Of these respondents, 97% either did not express a view on cost recovery or broadly agreed with the proposed cost recovery measures. Some of those who did not respond noted that additional information on the proposed fee structure was required to provide informed feedback.

In further detail:

- 35 (43%) of the respondents broadly agreed with the proposed cost recovery measures. 16 of these noted that this cost recovery should be dependent on industry maturity and adjusted over time
- One respondent (one per cent) broadly disagreed
- One respondent (one per cent) neither agreed nor disagreed
- 44 (54%) did not specify a response
- Five (6%) respondents commented that additional clarity was required around the proposed fee structure so an informed position could be adopted

6. FINANCIAL PERFORMANCE

6.1. Financial Estimates

TABLE 8: ESTIMATED EXPENSES AND REVENUE TO 2028-2029

Financial Item	2025-26	2026-27	2027-28	2028-29
REGO				
Total expenses	\$3,333,756	\$3,615,190	\$3,286,460	\$3,489,997
Total revenue	\$892,391	\$1,234,957	\$1,941,150	\$2,315,387
Balance = revenue - expenses	-\$2,441,365	-\$2,380,233	-\$1,345,310	-\$1,174,610
Cumulative balance	-\$2,441,365	-\$4,821,598	-\$6,166,908	-\$7,341,518
PGO				
Total expenses	\$8,065,023	\$16,778,453	\$16,745,607	\$18,081,540
Total revenue	\$10,996	\$6,399	\$156,510	\$1,736,112
Balance = revenue - expenses	-\$8,054,027	-\$16,772,054	-\$16,589,097	-\$16,345,428
Cumulative balance	-\$8,054,027	-\$24,826,081	-\$41,415,178	-\$57,760,606

7. NON-FINANCIAL PERFORMANCE

TABLE 9: NON-FINANCIAL PERFORMANCE MEASURES - REGULATORY OUTPUT

Output description	Total output volume^	2025-26	2026-27	2027-28	2028-29
REGO					
Registration of Person	Estimated	81	85	102	117
Registration of facility	Estimated	133	52	197	118
Certificate registration	Estimated	9,216,279	14,266,336	21,267,123	28,045,086
Annual Levy	Estimated	133	182	370	482
Total		9,216,626	14,266,655	21,267,792	28,045,803
PGO					
Registration of person	Estimated	22	12	13	7
Registration of profiles					
Production	Estimated	16	18	11	7
Delivery	Estimated	31	36	22	20
Consumption	Estimated	31	36	22	20
Certificate registration	Estimated	3,735,523	272,668,876	952,945,430	1,207,231,880
Addition of consumption information	Estimated	1,867,762	138,508,120	614,807,153	659,613,588
Annual Levy	Estimated	79	173	221	310
Total		5,603,464	411,177,270	1,567,752,872	1,866,845,831

Notes ^ See Appendix 1 for a summary of sources that have informed estimated output volumes.

8. KEY FORWARD DATES AND EVENTS

	Date Due	Responsible Party
Update financial outcomes/Volumes and CRIS	1 year after implementation	CER Finance
Portfolio Charging Review	2028 for 2028-29 Budget	DCCEEW Finance/CER Finance
Stakeholder Engagement	Ongoing	CER Policy

9. CRIS APPROVAL

Date of change	CRIS change	Approver	
19/08/2025	Approval for the CRIS release	Assistant Minister for Climate Change and Energy	Medium Charging Risk Assessment rating

Appendix 1: References

The CER has drawn on the following to inform estimates of the output volumes in section 7.

Product Guarantee of Origin (PGO) volume estimation sources

- CSIRO HyResource⁵ - Hydrogen
- DISR - Resources and energy quarterly⁶ - Iron ore & Aluminium
- Australian Aluminium Council reports⁷ - Aluminium
- CSIRO Sustainable Aviation fuel roadmap⁸ - Renewable Diesel and SAF
- Bioenergy Australia – Securing our fuel future: Resilience through LCLF⁹ - Renewable Diesel and SAF
- ARENA projects database¹⁰ – Biomethane

Renewable Electricity Guarantee of Origin (REGO) volume estimation sources

- OpenNEM database¹¹
- REC registry¹²

⁵ <https://research.csiro.au/hyresource/projects/>

⁶ <https://www.industry.gov.au/sites/default/files/2025-03/resources-and-energy-quarterly-march-2025.pdf>

⁷ <https://aluminium.org.au/australian-industry/australian-aluminium/>

⁸ <https://www.csiro.au/-/media/Energy/Sustainable-Aviation-Fuel/Sustainable-Aviation-Fuel-Roadmap.pdf>

⁹ <https://cdn.revolutionise.com.au/cups/bioenergy/files/nyydxvvoi7belg4m.pdf>

¹⁰ <https://arena.gov.au/projects/?project-value-start=0&project-value-end=2000000000&technology=bioenergy>

¹¹ <https://explore.openelectricity.org.au/facilities/nem/?status=operating>

¹² <https://www.rec-registry.gov.au/rec-registry/app/home>