Australian Government
Clean Energy Regulator

EMISSIONS REDUCTION FUND

Participating in the Emissions Reduction Fund

A guide to the aggregated small energy users method

The Emissions Reduction Fund

The Emissions Reduction Fund is a voluntary scheme that aims to reduce Australia's greenhouse gas emissions by providing incentives for organisations and individuals to adopt new practices and technologies to reduce their emissions.

Emissions Reduction Fund projects must be conducted according to an approved method. A number of activities are eligible under the scheme, and individuals and organisations taking part may be able to earn Australian carbon credit units (ACCUs). One ACCU is earned for each tonne of carbon dioxide equivalent (tCO_2-e) stored or avoided by a project. ACCUs may be sold to generate additional income, either to the Australian Government through a carbon abatement contract or on the secondary market.

Why participate?

As well as contributing to Australia's efforts to reduce the amount of greenhouse gas entering the atmosphere and the opportunity to earn ACCUs, running an Emissions Reduction Fund project may offer a range of other benefits for scheme participants. An aggregated small energy users project may help reduce emissions by reducing energy consumption for small energy users such as households and small businesses, helping them save money on their energy bills.

Using this booklet

This booklet includes the information you need to do to conduct an aggregated small energy users project using the Carbon Credits (Carbon Farming Initiative) Methodology (Aggregated Small Energy Users) Determination 2015 (the method), which you can access through the Clean Energy Regulator website. Methods set out the rules for conducting activities under the Emissions Reduction Fund and the ability to earn ACCUs.

The guide is complementary to the *Carbon Credits (Carbon Farming Initiative) Act 2011*[1] (the Act), the associated legislative rules, approved method and explanatory statement, but does not replace them. It has been prepared by the Clean Energy Regulator, an independent Australian statutory authority responsible for administering legislation to reduce carbon emissions and increase the use of clean energy.

[1] http://www.comlaw.gov.au/Series/C2011A00101

Overview of an aggregated small energy users project

An aggregated small energy users project involves offering goods and services to a large group of small energy users, such as households and small businesses, to help them reduce their consumption of grid electricity and natural gas. In doing so, the project will help reduce the amount of greenhouse gas entering the atmosphere. The project will also help households and small businesses save money on their energy bills.

Requirement for an accredited statistician

The aggregated small energy users method requires you to engage a statistician accredited by the Statistical Society of Australia Inc. If you are not willing to do this you cannot run an aggregated small energy users project.

The use of the aggregated small energy users method also requires a complex understanding of statistics, so you may need to seek additional statistical advice to establish and run your project.

As the project owner, you can choose which goods and services you offer provided they meet the requirements of the method. For example, you could offer to upgrade equipment such as lighting, change building elements such as draft seals, or provide information to influence household energy consumption behaviour.

You must also set up a control group: this is a group of small energy users who are not offered the chance to use your goods or services to reduce their energy use. The effectiveness of your project will be the difference between the amounts of energy the two groups use. It will be used to calculate the emissions abatement—which is based on the reduction in emissions from using your goods and services.

If the emissions of the treatment group (the group receiving your goods and services) are lower than the control group by a statistically significant amount, you can receive ACCUs representing the emissions reduction. To account for the variability of emissions between small energy users both the treatment and control groups may need to include tens of thousands of small energy users.

To conduct an aggregated small energy users project and earn ACCUs, make sure you read and understand the method and other legislative requirements. You will need to:

- Download and read the *Carbon Credits (Carbon Farming Initiative – Aggregated Small Energy Users) Methodology Determination 2015*[2] and its explanatory statement.

[2] http://www.comlaw.gov.au/Details/F2015L00345/Download

- Download and understand how the *Carbon Credits (Carbon Farming Initiative) Act 2011* (the Act)[3], the Carbon Credits (Carbon Farming Initiative) Regulations 2011[4] and the Carbon Credits (Carbon Farming Initiative) Rule 2015[5] apply to a project.
- Seek legal advice if necessary to ensure that your proposed use of energy consumption data for your project is consistent with privacy legislation and your own privacy policies.
- Ensure you are the only participant seeking to use the energy consumption data for this group of small energy users for an Emissions Reduction Fund project or similar method in state-based energy efficiency schemes.
- Apply to register as a scheme participant, to open an account in the Australian National Registry of Emissions Units (ANREU) and to conduct an aggregated small energy users eligible offsets project.
- Establish your project according to the instructions in parts two and three of the method.
- Engage an accredited statistician to certify your selection of control and treatment groups. Consider also engaging a statistician to provide advice on the design of your project, in particular the number of sites to include in control and treatment groups and your choice of sub-method.
- Set-up record keeping and monitoring systems for your project as required by part 5 of the method.
- Estimate the average annual abatement of your project and obtain an audit schedule for your project from the Clean Energy Regulator.
- Engage a Category 2 Greenhouse and Energy Auditor. It is important to do this early in your project, so that issues that may arise at audit are addressed early. Submit audits of your project according to your audit schedule.
- Determine the abatement from your project using the calculations in part four of the method.
- Submit your offsets report as well as your application for ACCUs to the Clean Energy Regulator for assessment.

You must comply with relevant Commonwealth, state, territory, and local government laws and regulations when conducting your project, and you are advised to ensure that the goods and services you intend to deliver under the project are compliant with all relevant legal and regulatory requirements. Nothing in the method renders you immune from any other legal and regulatory requirements that could affect the conduct of the project. The Clean Energy Regulator will regard your compliance with all relevant legal and regulatory requirements when conducting the project as a relevant factor in its assessment of you as a fit and proper person for the purposes of the Act.

[3] http://www.comlaw.gov.au/Series/C2011A00101
[4] https://www.comlaw.gov.au/Series/F2011L02583
[5] http://www.comlaw.gov.au/Details/F2015L00156

What an aggregated small energy users project looks like

An aggregated small energy users project involves you working with large numbers of small energy users who are mostly households and small businesses. The design of the project may require the participation of tens of thousands of small energy users. There will be two groups:

- a treatment group that has access to your goods and services to try to reduce their energy use, and
- a control group that has no such access.

Control and treatment group site are referred to as 'populations'. Individual households are allocated to each group at random, using a statistically valid sample process.

You can choose the goods or services you offer to the treatment group to reduce emissions from grid electricity and natural gas consumption. You might make changes directly, for example by installing new equipment in buildings, or indirectly, for example by providing information to treatment group households or small businesses on the benefits of energy-saving activities. No changes to affect emissions can be made directly or indirectly to the control group during the project.

Legal right in an aggregated small energy users project

You will need access to the energy consumption data for both the treatment and control groups, for example through an agreement to access the billing data of an electricity utility or through an energy monitoring program. You must have the exclusive right to use the energy consumption data for an Emissions Reduction Fund project and in compliance with the privacy requirements under which the data were collected.

The aggregated small energy users project allows for a wide range of activities, within the following broad categories:

- information about energy consumer behaviour, or opportunities to reduce emissions from energy consumption
- installing, removing or making changes to equipment, such as replacing inefficient light bulbs
- making changes to the way equipment is used, such as installing standby power controllers for television and audio visual equipment
- installing, removing or making changes to parts of the building, such as installing draft seals on external doors, or

- changing the energy source used to power equipment at treatment group sites, such as installing new efficient gas heaters (both electricity and gas would need to be monitored as part of the project)[6].

Details of what is required for an aggregated small energy users project to be considered eligible by the Clean Energy Regulator are in parts two and three of the method and explanatory statement.

Measurement and reporting periods in an aggregated small energy users project

A measurement period under the aggregated small energy users method refers to the period that energy consumption is measured and emissions reductions are calculated.

Measurement periods run for one year, with the exception of the final measurement period, which may run for one to two years to align with the end of the project's seven year crediting period. You can choose when the first measurement period for a population starts during the period. Subsequent measurement periods start immediately after the previous measurement period ends.

To receive ACCUs, a participant must submit reports to the Clean Energy Regulator. The Act gives provision for reporting periods of up to two years, which means that a reporting period may comprise one measurement period or two one-year measurement periods (covering two consecutive years).

Setting up and running an aggregated small energy users project

How an aggregated small energy users project is established is critical for calculating abatement and how many ACCUs may be issued. Parts three and four of the method and explanatory statement describe in detail how to set up a project and how to calculate the abatement that has occurred.

Setting up and running an aggregated small energy users project can be divided into the following parts. The relevant sections of the method and explanatory statement are given and should be referred to.

Establish the project

Part three of the method sets out choices that must be made at the beginning of the project, and the sequence in which these choices must be made. For example you must choose the sub-method you will use to calculate the net abatement amount for a population before allocating sites in that population to control and treatment groups.

[6] Subject to restrictions around fuel-switching and renewable energy elsewhere in the method, the Act and subordinate legislation.

You need to include a large number of sites in your project. This is because you need to be able to calculate a net abatement amount that is statistically valid.

Choose a sub-method

When choosing a sub-method, you should consider the data you have available, the cost of collecting additional data, and the potential benefits for the precision of your abatement estimate.

The method includes three different sub-methods for calculating abatement, each with different data requirements:

- Sub-method one requires only energy consumption data to be collected while the project is operating. It directly compares the energy consumption for the treatment and control group.
- Sub-method two requires energy use data from before the project commenced to establish a baseline. This establishes a pre-treatment baseline that helps improve the estimation of the differences between emissions in the control and treatment groups.
- Sub-method three allows you to choose to include other explanatory variables that can influence energy consumption. This can further improve estimates of the differences between emissions in the control and treatment groups.

Define the population

You must define one or more populations to include in your project. Your population can either be a list of specific sites (e.g. each site identified by address), or an unambiguous description of the types of sites that will be members of the population (e.g. all residential gas customers of retailer XYZ in postcodes 1234 and 9876). Each population must be large enough and with energy usage data that are sufficiently similar to meet the requirements of the statistical tests of significance.

For each population, make the following choices before allocating sites to control and treatment groups:

- the sub-method that will be used to calculate abatement and, if sub-method three is chosen, any explanatory variables that will be used in the regression equation
- the start date of the first measurement period
- if sub-method two or three is chosen, dates of pre-treatment periods, or
- for each site in the population, whether to cover natural gas, electricity or both at that site.

You must make a date-stamped record of these choices, as evidence that they were made before selecting control and treatment groups (see division three of part five of the method).

You must use a random selection method to allocate sites in the population to control and treatment groups. An accredited statistician must certify that you have done this in accordance with the method.

How to determine the required population size

To receive ACCUs for an aggregated small energy users project, you must be able to meet the requirements of the statistical tests of significance for your chosen sub-method.

The population size required to meet these requirements will depend on the magnitude of the effect and the variability in the population.

For example, a project where the treatment achieved 1% change in energy consumption across the treatment group would need a much larger sample size than a treatment which achieved a 10% change in energy consumption for the same group. Also, if the treatment has a variable impact, the sample size may need to be higher than if all of the population responds in a similar way.

You should conduct a statistical analysis, including a power analysis, to determine the population size required for your aggregated small energy users project. You are advised to consider seeking professional statistical advice if you do not have the statistical knowledge to do this yourself.

You should also consider how sites affected by attrition will impact the project. Consider whether you might need to add additional small energy users to 'top-up' the control or treatment group in a subsequent selection (see section 15 of the method). This means that you may not want to allocate every site in your population to your control or treatment groups so you can 'top-up' the groups if you need to.

When is a site affected by attrition?

A site is affected by attrition only if:

- you no longer have access to data about consumption of electricity, natural gas or both at the site because the energy account is terminated, for example if the site occupant switches to a different energy retailer
- for reasons beyond your control, you lose the exclusive legal right to use the energy consumption data for the project, or a site occupant explicitly withdraws their consent for their energy consumption data to be used for the project, or
- you defined your population with reference to a particular type of site, and the site no longer fits the definition.

Once a site is affected by attrition, it must be excluded from the population for the rest of the crediting period. No sites can be removed from the project other than those that are affected by attrition.

Deliver your goods or services to the treatment group

You can now begin delivering the activity to the treatment group. The method does not require the activity to be delivered to every site in the treatment group. If a site declines the offer of goods and services, or if a site is missed when the treatment activities are undertaken, the site is retained in the treatment group for the purposes of calculating abatement for the project.

You can offer goods and services that form part of the treatment to a site in the control group if, for example, the site occupant specifically requests them after becoming aware that they are being offered to other energy customers. Be aware that doing this could reduce the net abatement amount for the project. Additionally, under the method, activities cannot be offered to the control group that increase their energy usage.

Conduct during the project

Part three division four of the method includes a number of restrictions on how you may interact with the control and treatment groups during the project. These are ongoing requirements which must continue to be met for the project to be, and remain, an eligible offset project.

The requirements of subdivision A are designed so that the control group remains an accurate indicator of what treatment group emissions would have been without the project.

For example, you must not provide advice to the control group that would encourage them to increase their energy consumption, unless it is done to the same extent in the treatment group. Furthermore, you must not change the metering arrangements for the energy consumption data if this would result in a greater difference between the metered energy consumption in the control and treatment groups.

Removing inefficient equipment

Section 30 of the method contains specific requirements for the removal or replacement of energy consuming equipment. If a treatment in the project involves the removal or replacement of equipment, the removed or replaced equipment must be disposed of or recycled in accordance with section 30. The requirements of section 30 apply to all removal or replacement activities conducted under the project, regardless of whether it is done by the registered participant, their agent, or a third party contractor. For example for a treatment where a contractor offered to replace inefficient lights with LED lights, you could either require the contractor to dispose of old lights, or sell them to a specialty recycler. The old lights could not be reused or resold for use elsewhere, because this would not reduce their overall emissions.

Subdivision B includes requirements to prevent ‘carbon leakage’, where the project activities lead to an increase in emissions outside the measurement boundary for the project. For example, you must not encourage sites to switch to another energy source if this energy source is not being measured for the purpose of the project. This section also covers the disposal of equipment that is removed as part of the project.

Other government programmes

Under the method you must not promote other government programmes to the treatment group to a greater extent than the control group. Section 21 of the legislative rules lists the other government programs for which this requirement applies, including the Renewable Energy Target and several state based energy efficiency schemes.

If other government programs are taken up by sites in the control and treatment groups (without being promoted through the project) it will be accounted for indirectly in the calculation of abatement in the method. For example a participant sends leaflets promoting solar hot water to the entire control and treatment group, which results in equal proportions of both groups taking up the offer, resulting in no significant impact on the difference in energy consumption.

Calculating abatement

In calculating abatement for your aggregated small energy users project, you are bound by the choices you made before selecting control and treatment groups. For example, if you chose to use sub-method one for a population, you must calculate abatement for that population using sub-method one throughout the project.

You can use pro-rata energy consumption data for a measurement period if:

- the electricity or gas meter readings for particular sites or populations do not fall on the start or end days of the measurement periods (see section 34), and
- a site is affected by attrition and you have access to energy consumption data for part of a measurement period only.

Other than sites affected by attrition, you must use all the sites you selected for the control and treatment group to calculate abatement. If a site is missed when you deliver goods or services as part of the activity, or if the small energy user opts out of receiving the goods and services, the site's energy consumption must still be used in the calculation of treatment group emissions.

Calculating abatement—sub-method one

Use the following steps:

- Calculate emissions for each site in the control and treatment group during the measurement period. This is done by multiplying energy consumption during the period by the relevant emissions factors (section 45).
- Calculate mean daily emissions for each site in the control group and the treatment group (sections 43 and 44 respectively).
- Test whether the difference between the control and treatment groups is significant (section 40): the mean daily emissions from the treatment group should be significantly lower than those from the control group.

If the treatment group's emissions are statistically significantly lower than those of the control group, calculate abatement for the population using the equation in section 42.

If the treatment group's emissions are not found to be significantly lower than those of the control group—so you cannot reject the null hypothesis—abatement for that population in the measurement period is calculated to be zero (see the table in section 38).

Calculating abatement—sub-method two

Use the following steps:

- Calculate emissions for each site in the control and treatment group during both the measurement period and the pre-treatment period. This is done by multiplying energy consumption during the period by the relevant emissions factors (sections 53 and 54).
- For each site, find the change in emissions between the pre-treatment period and the measurement period, adjusting for any difference in the number of days in each period covered by energy consumption data (section 52).
- Calculate the mean daily change in site emissions between the pre-treatment period and measurement period for both the control group (section 50) and the treatment group (section 51).
- Test whether the change in emissions for the treatment group is lower than the change in emissions for the control group by a statistically significant amount (section 47).

The change in treatment group emissions is lower than the change in control group emissions if:

- the treatment group's emissions have increased over time by a smaller amount than the control group's emissions have increased, or
- the treatment group's emissions have decreased over time by more than the control group's emissions have decreased.

For example in a population where the business-as-usual trend results in emissions decreasing over time in both the treatment and control group, the change in pre and post treatment emissions will be a negative number for both groups. If the treatment has been effective the size of the change in the treatment group will be a smaller negative number (and a larger in absolute number).

If the difference between the control and treatment group is found to be statistically significant, calculate abatement using the equations in section 49.

If the change in the treatment group's emissions is not lower than the control group's emissions by a statistically significant amount—so you cannot reject the null hypothesis—abatement for that population in the measurement period is calculated to be zero (see the table in section 38).

Calculating abatement—sub-method three

Use the following steps:

- Calculate emissions for each site in the control and treatment group during both the measurement period and the pre-treatment period. This is done by multiplying energy consumption during the period by the relevant emissions factors (sections 61 and 62).
- Calculate mean daily emissions for each site for both the pre-treatment and measurement periods (sections 60 and 59 respectively).

You must then create a data set containing one entry for each site in the control or treatment group, with results for the site against the following variables:

- mean daily emissions at the site in the measurement period (section 59)

- a treatment variable with the value of zero (for a site in the control group) or one (for a site in the treatment group)
- mean daily emissions at the site in the pre-treatment period (section 60)
- variables to capture the effect of attrition on mean daily emissions at the site, which take the value zero (the site was affected by attrition) or one (the site was not affected by attrition) during the relevant time period (this is optional), or
- other variables that may influence consumption of grid electricity or gas at the site (optional).

Define a linear equation relating mean daily emissions at a site in the measurement period (the dependent variable) to the variables listed above (section 58).

Use linear regression, weighted by the number of days for which measured energy consumption data is used for the site in the measurement period, to calculate the value of the 'treatment variable'. This lets you determine the effect of the treatment variable on emissions in the treatment group; it will be negative if emissions have declined compared to the control group.

Test the statistical significance of the effect of the treatment variable (section 56):

- If the treatment variable is less than zero by a statistically significant amount, calculate abatement using the equations in section 57.
- If the treatment variable is not less than zero by a statistically significant amount—so you cannot reject the null hypothesis—abatement is set to zero (see the table in section 38).

Calculating the net amount of abatement and number of ACCUs

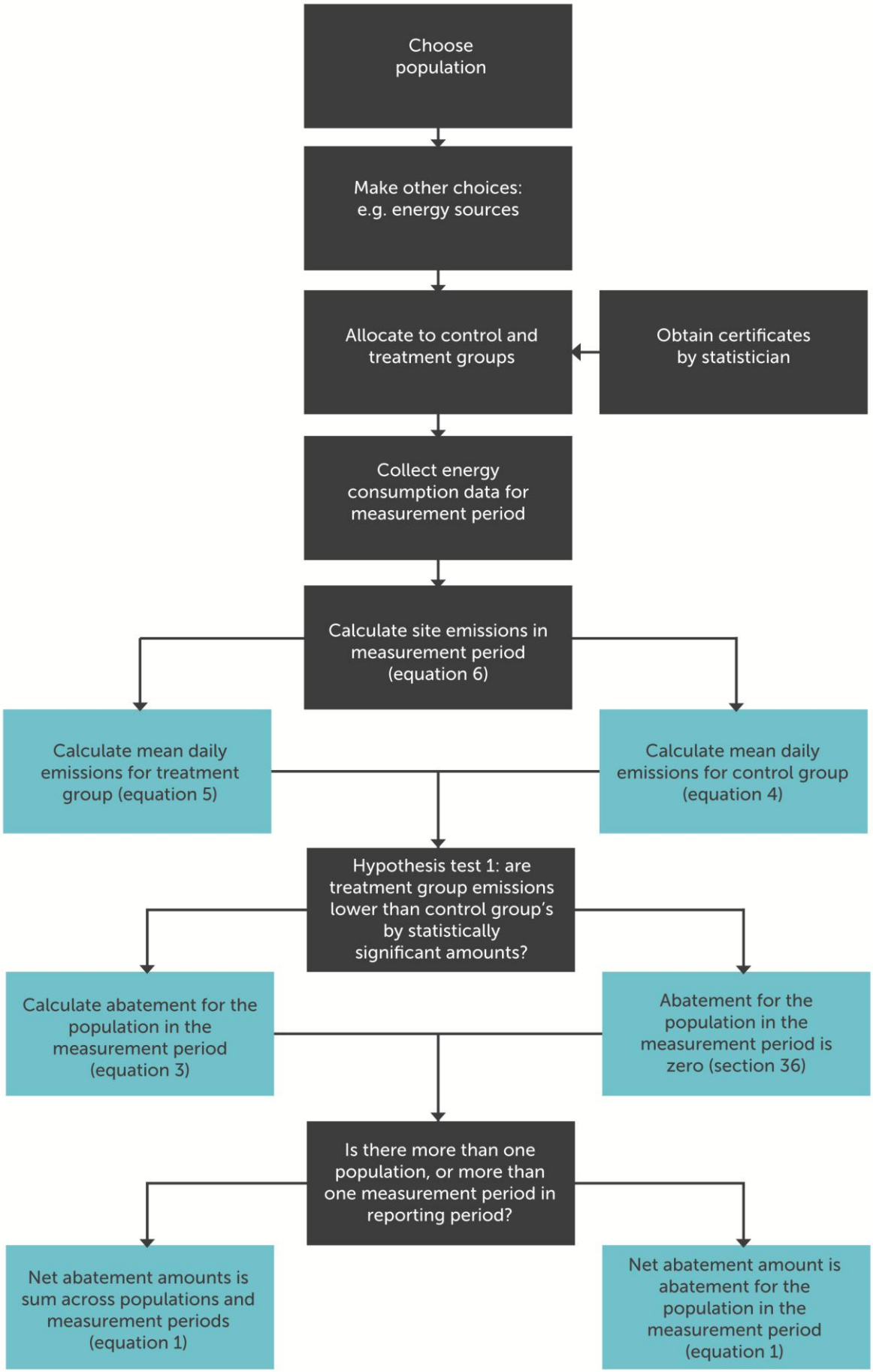
This is the final step in the calculations to determine the number of ACCUs that may be issued for a reporting period.

You may include more than one population in a project, and may choose to include two one-year measurement periods in a reporting period. If this is the case, the net abatement amount for the reporting period is found by adding abatement calculated for individual populations and measurement periods.

Calculating abatement for multiple populations in a single reporting period will require you to align the measurement periods for your populations. Alternatively, if the metering cycle for a whole population is different from the measurement periods that you are using for another population, you have the option of reporting the two populations separately as if they were separate projects (see part six).

This figure on the next page shows the sequence of decisions and calculations involved in an aggregated small energy users project. This example uses sub-method one to calculate the net abatement amount for the first reporting period for a project.

Figure one: Process to calculate net amount of abatement



Monitoring and record keeping

Monitoring an aggregated small energy user project involves collecting data on the consumption of electricity, natural gas or both at sites in the control and treatment group. The method includes a number of options for collecting this data, including using data that is already being collected for billing purposes. If you have chosen to use other variables under sub-method three, the method also includes requirements on how to monitor these variables. For more detail on how to monitor your project, see division four of part five of the method.

The Clean Energy Regulator recommends you draw up a plan for the monitoring, data collecting and record keeping because it must be in place from the start of the project. Should a project and associated audit show that data collection and record keeping has not been adequate in the reporting period, ACCUs may not be issued for some or all of that reporting period. If you are uncertain if your project will meet these requirements, seek advice from professionals in the field such as statisticians or auditors.

When developing your plan, make sure you have the right controls and processes around your data. For example, are you collecting your data efficiently and will you be able to maintain your data in the event of an emergency such as a fire?

The different types of records that must be kept for an aggregated small energy users project include date-stamped records of the choices made about options for calculating abatement, information about sites included in the project, and records relating to the disposal of equipment removed or replaced as part of the project. The complete list of records required, in addition to the record-keeping requirements that apply to all projects set out in the Act and legislative rules can be found in division three of part five of the method.

Notification

The aggregated small energy users method includes one notification requirement in addition to the general requirements that apply to all projects set out in the Act and subordinate legislation. You must notify the Clean Energy Regulator of a decision to change the activities undertaken as part of a treatment for a population in the project if the new activities are not covered by the description of the treatment included in the original project application or a previous notification. You must notify the Clean Energy Regulator of any decision to change the activities for a population in your project at least 30 days before starting the new activities.

For example, if when you registered your project, you described the treatment as sending leaflets and text messages to energy customers to encourage them to reduce their electricity consumption, you must not change the treatment to include installing energy efficient lighting at households in the treatment group without notifying the Clean Energy Regulator 30 days before commencing any lighting installations.

Project and audit reports

You need to report on your project to the Clean Energy Regulator. Audits are required where indicated in your project's audit schedule, which the Clean Energy Regulator will provide following registration of your project.

You must submit your first report between one and two years from the date the project was registered and then up to every two years thereafter. The aggregated small energy users method requires that for each population measurement periods run for at least 12 months and be wholly contained within a reporting period. The most frequently a project with one population can report is annually, however projects with multiple populations can split the reporting into parts, provided each part consists of one or more population(s).

Division one of part five of the method lists the information that must be included in your project reports. Applications for ACCUs can be made at the same time as you submit your project reports using the Certificate of entitlement including offsets report form. Full reporting, record keeping and monitoring requirements are set out in regulations and rules made under the Act. You should familiarise yourself with these requirements.

The Clean Energy Regulator will not issue Australian carbon credit units automatically on receipt of a project report.

Emission reduction Fund projects are able to generate credits throughout their crediting period. The crediting period for an aggregated small energy users project is seven years.

The role of audit

Audits assess whether a project complies with project registration, the relevant method and legislative requirements. Audit reports must be prepared by a registered Category 2 Greenhouse and Energy Auditor. A list of auditors is available on the Clean Energy Regulator website under National Greenhouse and Energy Reporting[7].

The Clean Energy Regulator recommends you engage your auditor early when developing your project to ensure the project is auditable and to assist the auditor to plan activities throughout the reporting and post-reporting periods. You may also wish to discuss the role of the accredited statistician with the auditor.

The costs of any audit are your responsibility or the responsibility of your organisation. You must make available to the auditor all necessary documents and information, including data records, receipts, and other supporting documentation, and calculation.

[7] http://www.cleanenergyregulator.gov.au/NGER/For-auditors/Register-of-auditors

Making changes to your project

You must notify the Clean Energy Regulator of any changes to your own or your project's circumstances or operations that may affect the project's eligibility or the amount of abatement reported and the number of ACCUs claimed.

If you decide to change the activities offered under your project, you must notify the Clean Energy Regulator. Requirements are discussed in more detail in the 'notification' section above.

Resources

- For more information on participating in the Emissions Reduction Fund—www.cleanenergyregulator.gov.au[8]
- For more information regarding method development—www.environment.gov.au[9]
- www.comlaw.gov.au[10] for all legislative instruments, including the:
  - *Carbon credits (Carbon Farming Initiative) Act 2011* (current version)[11]
  - Carbon credits (Carbon Farming Initiative) Regulations 2011[12]
  - Carbon Credits (Carbon Farming Initiative) Rule 2015[13]
  - Carbon Credits (Carbon Farming Initiative) Methodology (Aggregated Small Energy Users) Determination 2014[14]
  - Explanatory statement[15]
- Enquiries on participating in the emissions Reduction Fund—1300 553 542 or enquiries@cleanenergyregulator.gov.au[16]
- Statistical Society of Australia's list of accredited statisticians[17]
- Information on legal right[18] in the Emissions Reduction Fund
- Information on aggregation[19] in the Emissions Reduction Fund

[8] http://www.cleanenergyregulator.gov.au/
[9] http://www.environment.gov.au/
[10] http://www.comlaw.gov.au/
[11] http://www.comlaw.gov.au/Series/C2011A00101
[12] http://www.comlaw.gov.au/Series/F2011L02583
[13] http://www.comlaw.gov.au/Details/F2015L00156
[14] http://www.comlaw.gov.au/Details/F2015L00345
[15] https://www.comlaw.gov.au/Details/F2015L00345/Explanatory%20Statement/Text
[16] mailto:enquiries@cleanenergyregulator.gov.au
[17] http://www.statsoc.org.au/careers-accreditation/professional-accreditation/find-a-statistician/
[18] http://www.cleanenergyregulator.gov.au/ERF/Want-to-participate-in-the-Emissions-Reduction-Fund/Planning-a-project/Legal-right
[19] http://www.cleanenergyregulator.gov.au/Emissions-Reduction-Fund/Want-to-participate-in-the-Emissions-Reduction-Fund/Planning-a-project/Aggregation/Pages/default.aspx