

#14

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Q1

Contact name

Isabel Groombridge

Q2

Company name

NSW DCCEEW

Q3

Contact email

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Q4

Respondent skipped this question

We will treat all submissions as public documents, unless you request it to be confidential. We may publish non-confidential submissions on our website. Submissions will be published with the name, company name email address information included.

Page 3: The new Unit & Certificate Registry

Q5

What registry features and functionality will be the most important to address the current challenges faced by carbon markets?

NSW Electricity Infrastructure Roadmap ensures generators carbon emissions are offset. Generators must procure NSW based offsets to meet the regulated requirements. Therefore the platform must be able to filter the ACCU attributes by location of abatement. Additionally, under the legislation the NSW EPA can procure the ACCUs on behalf of the generator if they fail to do so. This means the platform must enable the purchase of ACCUs in another entities name.

Q6

What registry features and functionality will be the most important to take advantage of the opportunities presented by the growth in carbon markets?

-

Q7

Should information about the co-benefits associated with units and certificates (for example, First Nation community outcomes and environmental benefits) be made available in the registry? If so, should this include third-party verified and unverified information?

Yes, this should include third-party verified and unverified information

Comment:

-

Q8

What existing frameworks could be relied upon to verify co-benefits?

-

Q9

What types of digital platforms and marketplaces would be useful to have connected directly to the registry? What are the key benefits and risks of allowing this connectivity?

-

Q10

Are the criteria (see page 11 of the discussion paper) to allow external systems to connect directly to the registry appropriate?

Unsure

Q11

What registry data would external systems connecting directly to the registry need access to?

-

Q12

Are there any other areas, suggestions or concerns with the registry that should be noted?

-

Page 4: The proposed exchange-trading model

Q13

Please identify the specific carbon exchange user segment(s) applicable to you:

Other (please specify):
Government

Q14

Yes

Does the market need a central carbon exchange to be established?

Q15

Are there alternative options to a carbon exchange that could provide greater accessibility, liquidity and price discovery for ACCUs and other certificates?

Not that I can think of

Q16

What challenges do you foresee in the use of the CDI framework to support the carbon exchange and the proposed process to convert CDI holdings into ACCU holdings? How might these challenges be mitigated?

-

Q17

Would you use a carbon exchange that is developed using the prototype model outlined above and in Appendix A (see page 17 in the discussion paper)?

-

Q18

What quantities of ACCUs do you anticipate buying or selling through the carbon exchange?

Quantities equivalent to offset scope 1 emissions for large renewable generation infrastructure projects, including large batteries, and other storage infrastructure (e.g. hydroelectric).

Q19

How frequently do you anticipate buying or selling ACCUs through the carbon exchange?

Annually

Q20

Do you prefer the quotation of ACCUs on the carbon exchange to be:

Bifurcated into 2 classes – carbon sequestration and emissions avoidance (option 2)

Q21

Do you anticipate any market implications from bifurcating listing to carbon sequestration and emissions avoidance?

-

Q22

Are there other classes that should be considered for quotation of ACCUs on the carbon exchange?

-

Q23

Would the public disclosure of the project method of an ACCU that is received, and then subsequently surrendered or cancelled, under a system generated random allocation process when converting CDIs to ACCUs:

Yes/no

adversely impact your intended use of the carbon exchange?

is any such adverse impact mitigated by option 2 above, that is, limiting ACCUs received to those generated under a project method classified as involving 'carbon sequestration' or 'emissions avoidance' (as applicable to the class of ACCUs traded)?

Comment:

Unknown at this stage

Q24

Do you support placing controls or disincentives on the cycling of ACCUs off and onto the exchange with the intention of exchanging one ACCU with certain attributes for another, or should such cycling be allowed?

Unsure,

Comment:

Exchanging one ACCU with certain attribute for another should be allowed

Q25

If controls or disincentives against cycling off and onto the exchange are to be introduced, should they involve:

Yes/no

Restrictions on the use of ACCUs following the collapse of a CDI so that they must be surrendered for Safeguard Mechanism compliance or voluntary cancellation for offsetting purposes?

Restrictions or economic disincentives on cycling ACCUs allocated upon conversion from CDIs back onto the exchange but not otherwise restricting the use of those ACCUs (e.g. so that they may be sold on the OTC market)?

Some other form of restriction or disincentive?

Other (please specify):

-

Q26

Will the proposed exchange model complement the OTC market?

Unsure,

Comment:

-

Q27

Comment:

Are there other issues beyond those set out in this paper with only identifying the project method and other specific attributes of an ACCU after conversion from a CDI?

Q28

Are there any other areas, suggestions or concerns with the proposed exchange trading model that should be noted?

-

Q29

Respondent skipped this question

If you would like to submit additional materials to support your response, please attach documents here.
