

26th September, 2022

CERT Team

Public Consultation 3

Dear CERT Team,

Trellis Technologies provides software for carbon accounting and utility management that aids public and private organisations in their sustainability journey. Our feedback supports and recommends the following:

- Establishment of a federal emission factor that removes the choice between Market and Location based accounting approach which would:
 - Create standardisation in carbon accounting practices through the removal of state based grid factors.
 - Assist in the removal of systematic double counting by different entities using different systems of carbon accounting.
- Utilisation of a single national framework for emissions tracking. Currently there are numerous framework being applied, including but not limited to:
 - National Greenhouse and Energy Reporting Act (NGER), National Greenhouse Accounts (NGA) Factors, Climate Active, GreenPower, CERT, Hydrogen Guarantee of Origin and proposed Renewables Guarantee of Origin.
- GreenPower should be the single national Renewable Electricity Program, with fair pricing so that:
 - Consumers are encouraged to take up GreenPower and renewable options
 - Those paying for 100% renewables with 100% LGCs, are not overcharged
 - Renewable consumers are paying for LRET and SRET RECs effectively making them pay 145% of the actual and fair cost.
 - The pricing of accredited renewable electricity to customers, reflects the falling cost of renewable electricity generation and firming.

Kind Regards,



Matthew Shorten
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