18 July 2025

Department of Climate Change, Energy, the Environment & Water
Guarantee of Origin and Trade and Renewable Electricity Guarantee of Origin Section

Submitted: via online survey at https://consult.dcceew.gov.au/exposure-drafts-of-the-legislative-instruments-that-will-support-the-go-scheme/new-survey?page=1

Stanwell submission
Exposure drafts of the legislative instruments that will support the Guarantee of Origin (GO Scheme) - Rules

Stanwell Corporation Limited (Stanwell) welcomes the opportunity to respond to the Department of Climate Change, Energy, the Environment and Water's (DCCEEW) public consultation on the *Exposure drafts of the legislative instruments that will support the Guarantee of Origin (GO) Scheme*.

Stanwell is Queensland's leading provider of electricity and energy solutions to the National Electricity Market, and large energy users along the eastern seaboard of Australia.

With over 40 years of continuous operations, Stanwell's experience in working with communities to build, operate and maintain reliable energy generation assets is also being applied to the rollout of renewable energy.

Stanwell is developing a pipeline of renewable energy and storage projects throughout Queensland, whilst maintaining a reliable supply of baseload power from two of the most efficient and reliable coal-fired power stations in Australia – the Tarong power stations near Kingaroy and Stanwell Power Station near Rockhampton. Stanwell owns the Meandu Mine which is adjacent to and supplies coal to the Tarong power stations.

This response contains the views of Stanwell only and should not be construed as being indicative or representative of the views or policy of the Queensland Government.

Stanwell's submission is in relation to the registration process and calculation of auxiliary losses as proposed in the *Exposure Draft of the Future Made in Australia (Guarantee of Origin) Rules 2025* (the Consultation Paper).

Registration of renewable electricity facility – first energy

Under the Renewable Energy Electricity Act, proponents of a new power station may lodge an application for a facility to become an Accredited Power Station even before the power station commences commissioning.

During the commissioning process, the power station would be generating renewable electricity and exporting some of this to the grid.

Whilst a new power station may not achieve partial or full accreditation for some time (from time of application lodgement), our understanding of the Renewable Energy Electricity Act is that it gives the regulator the discretion to back-date the accreditation date to the time of application lodgement.

Our understanding is that this means that whilst Large Scale Generation Certificates (LGCs) could not be created until such time that accreditation is achieved, it would enable any electricity which was generated between application lodgement and accreditation to be recorded and then be eligible to create LGCs once accreditation is achieved.

It would be ideal if the GO scheme could adopt a similar approach for the creation of Renewable Electricity Guarantee of Origin certificates to ensure that no eligible renewable electricity is 'wasted' during commissioning or due to any delays in processing applications for accrediting new renewable electricity facilities.

Treatment of auxiliary losses for periods where generation is low

In the Auxiliary losses section of the Consultation Paper, it states that Auxiliary losses should include any electricity used to operate and maintain the system. The Auxiliary Factor is calculated (by dividing the sum of all auxiliary losses (AUX) by the sum of all electricity generated over a duration of time (TG)). In the instance where certificates are being created for a time period of an hour, the duration over which the Auxiliary Factor is calculated is one month.

Our question relates to situations whereby a renewable electricity facility is shut down partially or fully for maintenance works, whereby during the partial or full shutdown period of one month there is net import of electricity as a result of consumption by auxiliary loads and equipment used for the maintenance works. Once the renewable electricity facility is back up and running in the following month, can DCCEEW please clarify if all of the Auxiliary losses (net import) from the previous month must be applied to this following month, or is there the ability to spread this Auxiliary loss across more months of the year?

Whilst we acknowledged the Auxiliary losses as described for major maintenance works may not be a frequent nor significant issue, it would be helpful to understand the expected treatment of Auxiliary losses associated with large scale maintenance works for certificate creation forecasting purposes.

Stanwell would welcome the opportunity to further discussion the matters outlined in this submission. Please refer any enquiries to Zi Ying Koh, Senior Retail & Environmental Regulation Advisor on ziying.koh@stanwell.com.

Yours sincerely

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