

13 April 2018

Submissions
Climate Change Authority
GPO Box 787
ACT 2600
Submitted via email: submissions@climatechangeauthority.gov.au

Dear Sir/Madam,

Special Review of the National Wind Farm Commissioner

On behalf of the Clean Energy Council (CEC), I am pleased to respond to the Climate Change Authority's Special Review of the role of the National Wind Farm Commissioner.

As you are aware, the CEC is the peak body for the clean energy industry in Australia and we are committed to accelerating the transformation of Australia's energy system into one that is smarter and cleaner. In doing so, we recognise that community acceptance and support for renewable energy industries is fundamental to realising the full potential for our sector.

The CEC is supportive of the constructive role that has been played by the National Wind Farm Commissioner over the past two and a half years and believes that the Commissioner has delivered faithfully on the Terms of Reference of his appointment.

The Commissioner's open and proactive engagement with both the community and industry has been matched by a diligent and methodical approach to understanding issues and promoting practical improvements with a wide range of industry, government and community stakeholders.

The Commissioner, ably supported by his small team, has worked effectively as an independent scrutineer and mediator with regard to community complaints and the complaints management processes of industry members. Of the 163 complaints that had been received by the Commissioner's office as at the end of 2017, 145 of them had been resolved/closed. Many of these complaints are of a complex nature, and the Commissioner has been both efficient and effective in closing these matters out in a way which is generally regarded as fair and reasonable by the relevant parties.

The Commissioner has also been very active in fulfilling the requirement to share information and knowledge and promote best practice, through the Annual Reports to Parliament, the Commissioner's web site, and the manifold community and industry engagement events that he and his office have attended.

While the CEC may hold differing views from the Commissioner on some issues, we are completely aligned with his objectives of enhancing industry transparency, public confidence in the regulation of the industry, and community engagement practices.

In conducting its Special Review of the Commissioner's role, the Climate Change Authority has been asked by the Minister to look at whether the Commissioner's term should be extended, whether the scope should be expanded, and options for the funding of the role. The CEC provides its feedback on these questions below.

Should the role of the National Wind Farm Commissioner continue beyond the initial period of three years?

The role of the National Wind Farm Commissioner as currently executed under the Terms of Reference has played a constructive role in enhancing community confidence in the wind industry.

While the number of complaints regarding wind farms is relatively low reflecting a strong focus by the majority of wind developers on good community engagement practices, we recognise that the Commissioner fulfils an important function in complaints resolution and the provision of impartial information regarding the wind industry.

We are in the midst of an unprecedented wave of investment in renewable energy generating capacity to meet the Australian Government's Renewable Energy Target. Provided sensible long-term energy policy settings are put in place in the near term, sustained investment in large-scale renewable developments should continue, as old thermal generating capacity retires.

We therefore expect that the Commissioner's role will remain of significant community and industry value as unprecedented levels of renewable energy capacity is planned, built and commissioned in the lead up to 2020. The CEC supports the renewal of the appointment for a further three years provided that the updated Terms of Reference maintain the role's focus on:

- Working collaboratively with all levels of government, scientists, industry and the community to resolve complaints from communities about proposed and operational wind farms;
- Referring complaints to relevant state authorities and helping ensure that they are properly addressed; and
- Leading efforts to promote best practices, information availability, and provide a central, trusted source for dissemination of information.

Should the scope of the National Wind Farm Commissioner's role be expanded to other large-scale renewable energy projects, such as solar and storage?

The CEC supports the expansion of the role of the National Wind Farm Commissioner to encompass the large-scale solar sector and large-scale energy storage plants. The rationale for this proposal is as follows:

- *Large-scale solar is growing rapidly:* Of the 50 renewable energy projects which reached financial close in Australia in 2017, 16 were in wind generation, 30 were in solar, and two were hybrids of wind and solar. As the cost of solar technology falls, we can expect that utility-scale solar plants will establish themselves as a more prevalent part of the renewable energy mix.
- *Renewable energy firms are increasingly integrating large-scale storage into their project plans:* With a strong focus by the Australian Government on promoting reliability

and security of the energy system, many of our members are increasingly developing integrated projects in wind, solar and storage. Community expectations of developers will be the same regardless of the technology type and it does not make sense for the Commissioner to be limited to just one technology type.

- *Irrespective of the technology, major renewable energy developments share many common issues:* Matters of relevance to the wind industry such as community consultation, landholder negotiations/agreements, and planning considerations, are often just as pertinent for large-scale solar and storage developers/operators.
- *Expansion of the role to emerging industries will accelerate the knowledge-sharing from the wind industry to these newer technologies:* The Commissioner can play a valuable role in promoting best practice as the large-scale solar and energy storage sectors establish themselves, learning from the experiences of the wind industry.

What options are available to fund any ongoing role for the Wind Farm Commissioner?

The Clean Energy Council cautions any changes to the existing model of central Government funding.

The Commissioner provides a valuable public service to a wide range of stakeholders, from landholders and community groups to Government agencies, Members of Parliament, and industry. The independence of the Commissioner's office is essential to the confidence of this wide range of stakeholders and the public at large. Any changes which may place that independence in question will be damaging to the integrity of the role.

In addition, the current cost of running the Commissioner's office, averaged at roughly \$675,000 per annum, is a very modest sum. It is our view that the size of the administrative task of recovering the costs from either energy consumers or industry would be disproportionately large for the relatively small amount of money in question.

In summary, the Clean Energy Council supports the extension of the role of the Commissioner for a further three years with the existing focus on complaints mediation/resolution, impartial information sharing, and promotion of best practice. It also supports the expansion of the role to large-scale solar and large-scale storage developments.

Thank you for the opportunity to provide a submission to the Special Review and we remain ready and able to assist with any further information you may require to assist in the preparation of your report.

Yours sincerely,



Anna Freeman
Director – Energy Generation