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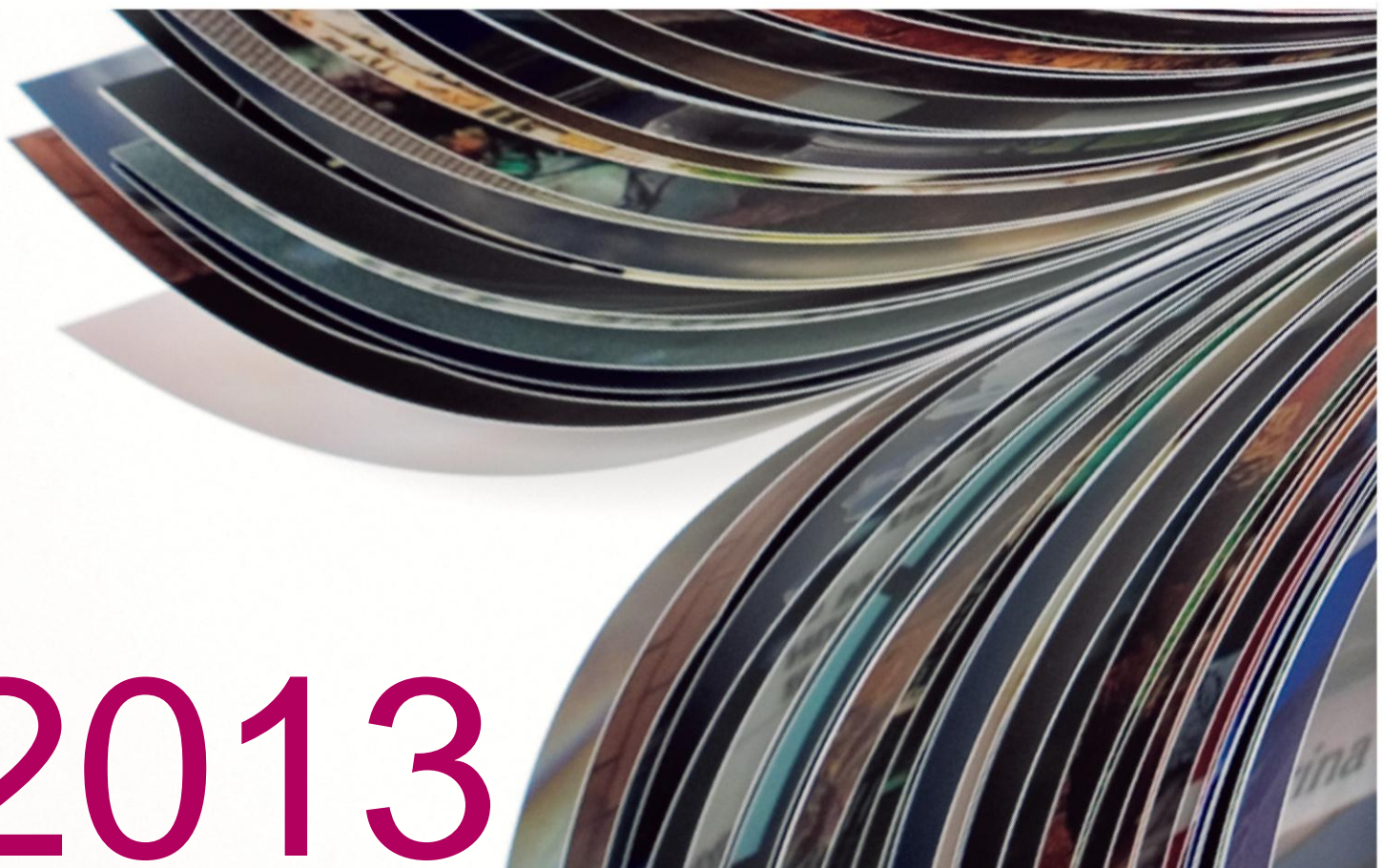
ELECTRICITY RETAILER DISCLOSURE STUDY

BRIEFING NOTE FOR THE TOTAL ENVIRONMENT CENTRE



Institute for
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2013



ABOUT THE AUTHORS

The Institute for Sustainable Futures (ISF) was established by the University of Technology, Sydney in 1996 to work with industry, government and the community to develop sustainable futures through research and consultancy. Our mission is to create change toward sustainable futures that protect and enhance the environment, human well-being and social equity. We seek to adopt an inter-disciplinary approach to our work and engage our partner organisations in a collaborative process that emphasises strategic decision-making.

For further information visit:

www.isf.uts.edu.au

Research team: Jenni Downes, Fiona Berry, Jay Rutovitz.

INSTITUTE FOR SUSTAINABLE FUTURES

University of Technology, Sydney

PO Box 123

Broadway, NSW, 2007

www.isf.edu.au

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1 INTRODUCTION

This briefing note has been produced for the Total Environment Centre by the Institute for Sustainable Futures at the University of Technology Sydney.

The primary aim of the research is to facilitate change towards providing electricity consumers with information on their electricity retailer's commitment to renewable energy and environmental sustainability. This project will provide an element of that research, and will provide a platform to encourage reform of the National Electricity Rules to require disclosure of the fuel mix and hence carbon intensity of the electricity purchased by Australian consumers, similar to the existing regulations and directives in the UK and Europe.

2 BACKGROUND

Australian consumers should have access to easy-to-understand information about their electricity purchases as electricity is a significant portion of most households' carbon emissions. Deregulation of electricity retailing in most Australian states (Vic, SA, Qld and NSW) has provided consumers with a multitude of retailers from which to source their electricity. At the same time federal renewable energy targets on energy generation, the availability of GreenPower products, and incentives for small scale renewable energy available to householders have resulted in an overwhelming amount of information, with competing claims on "green-ness".

The Green Electricity Watch surveys (2002-2007) sought to address a subset of this issue, by increasing the transparency of GreenPower products offered to Australian consumers. The Green Electricity Watch surveys ranked GreenPower products according to their potential to increase renewable energy, and uncovered poor practice in terms of misleading information. The results were also published on a widely used website.¹ Green Electricity Watch achieved significant improvements in the way these products were offered and promoted, fulfilling its objectives for reform of GreenPower products and disclosure: the minimum percentage of GreenPower that could be offered was increased to 20%, and anything less than 100% GreenPower can no longer be described as 100% renewable. However, GreenPower currently accounts for less than 2% of all residential electricity sold in Australia². The National Electricity Market is dominated by fossil fuel energy sources.

Most consumers are unaware of the carbon intensity of their electricity. The current National Electricity Rules do not require disclosure by electricity retailers of the fuel mix of electricity supplied to customers. Given the importance of climate change to the Australian public an analysis of the performance of Australian electricity retailers is warranted, including the fuel mix and carbon intensity of the electricity they supply.

Internationally there are precedents for fuel mix and carbon intensity disclosure. Electricity suppliers in the United Kingdom are required, under Electricity Regulation 2005, to provide data to their consumers on their fuel mix and carbon intensity. Ireland has introduced the same requirement, and the European Union has issued a directive for consumer labelling of fuel mix by suppliers.

¹ Now decommissioned due to the lack of recent survey and improved GP rules.

² Residential sales and customer numbers from Electricity Gas Australia (ESAA 2011), Green Power sales from National GreenPower Accreditation Program Annual Compliance Audit 2010.



3 APPROACH

This project examined 36 licensed electricity retailers active in the National Electricity Market (see Table 1 below), investigating three areas:

- **Fuel mix:** in the absence of publically available information on the fuel mix of electricity sold, this report examines ownership of generation assets, including the proportion of capacity from renewable energy sources, as a step towards reporting the fuel mix of electricity offered to customers. Unfortunately current data does not allow the fuel mix and carbon intensity of electricity offered to consumers to be calculated.
- **Commitment to renewable energy:** commitment to renewable energy development in Australia (specifically support for decentralised renewable energy generation, the carbon price and mandatory Renewable Energy Target, and level of GreenPower sales)
- **Commitment to sustainability:** publishing of a GRI-compliant sustainability report, presence of a corporate Environmental Policy, and an ISO 14001 Environmental Management System and participation in sustainability benchmarking systems.

3.1 LIMITATIONS

Currently, retailers in the National Electricity Market obtain their electricity from four sources: their own generation assets, power purchase agreements (PPAs) or other contracts with generators, the spot market, or the Electricity Futures and Options Market.³ Ownership of a generator, however, does not necessarily mean that electricity goes to their own customers, as suppliers are able to sell power generated directly to another retailer or into the spot market. The owner of a renewable generator, for example, may sell the entire output to another retailer, either because of historic reasons, or because another retailer wishes to have a large renewable portfolio to offer to their customers. Electricity retailers range from those who are able to supply a large proportion of their electricity sales from their own generation assets, to retailers that purchase all the electricity they sell from third parties. Therefore data on the fuel mix (and thus carbon intensity) of the electricity supplied to customers cannot be deduced from public information on ownership of generation assets.

Data on fuel mix and carbon intensity of the electricity sold by retailers is not in the public domain, and is not currently required to be reported by regulation.

Obtaining fuel mix and carbon intensity data, in the absence of mandatory reporting, would require a detailed survey of retailers, investigation into the retail electricity market and analysis of responses, which are beyond the scope of this project. The objective of this project, therefore, is to identify what currently exists in the public domain in order to also identify what *does not exist*. It should be noted that retailers may be reluctant to share confidential information of their purchasing and investment activities in a situation where their competitors may not choose to disclose such information.

This study focuses on the first step, analysing information available in the public domain that could be found by consumers should they be interested. Research has therefore been conducted into the three focus areas above, through internet searches and desktop analysis of publicly available data only.

³ AEMC “NEM financial market resilience” Issues Paper, June 2012



4 FINDINGS

4.1 OWNERSHIP AND SCOPE OF OPERATIONS

A total of 36 retailers operate across the National Electricity Market. Thirteen of these operate in just one state, while the remaining 23 operate in 2 or more states. Four of the 23 operate in all 6 states in the NEM. The scope of operations of each retailer is shown in Table 1 below.

Table 1: Electricity retailers and scope of operations in the National Electricity Market

Retailers	Scope of Operations					
	NSW	VIC	QLD	SA	TAS	ACT
ActewAGL	x					x
AGL Energy	x	x	x	x	x	x
Alinta Energy [^]		x	x	x		
Aurora Energy	x	x	x	x	x	x
Australian Power and Gas	x	x	x	x		x
Click Energy		x	x			
Cogent Energy	x	x		x		
COzero Retail ⁴			x			x
CS Energy			x			
Delta Electricity	x					
Diamond Energy	x	x	x	x		
Dodo Power and Gas	x	x	x	x		x
Energy Australia ¹	x	x	x	x	x	x
Energy Brix Australia		x				
Erating Energy	x					
Ergon Energy			x			
ERM Power [^]	x	x	x	x	x	x
Essential Energy ³					x	x
Flinders Power			x	x		
GridX ⁵	x					
Infigen Energy Markets ⁶	x					
Lumo Energy ⁷	x	x	x	x		
Metered Energy Holdings	x					
Momentum Energy	x	x	x	x		x
Neighbourhood Energy		x				
Origin Energy ^{2,3}	x	x	x	x		x
OzGen Retail		x	x			
Powerdirect	x	x	x	x		x
Progressive Green		x				
QEnergy [~]			x			
Red Energy	x	x	x	x		x
Sanctuary Energy	x		x	x		
Simply Energy	x	x	x	x		



Retailers	Scope of Operations					
	NSW	VIC	QLD	SA	TAS	ACT
Stanwell Corporation	x		x			
TrustPower Australia				x		
WINenergy	x					

Notes:

^ Also operates in WA

~ Also operates in NT

- 1 Energy Australia's retail arm became part of TRUenergy in December 2010. They operate under both the EnergyAustralia brand and the TRUenergy brand. The remaining business, which constitutes an electricity distribution network in NSW, was renamed AusGrid in March 2011.
- 2 Integral Energy sold its retail arm to Origin Energy in December 2010. The remaining business, which constitutes an electricity distribution network in NSW, was renamed Endeavour Energy in March 2011.
- 3 Country Energy sold its NSW gas network business to Envestra in October 2010 and its retail arm in New South Wales to Origin Energy in December 2010. The remaining business, which constitutes an electricity distribution network in New South Wales and retail businesses in the ACT and Tasmania, was renamed Essential Energy in March 2011.
- 4 In September 2011, Jackgreen (International) Pty Ltd was renamed COzero Retail.
- 5 GridX is licensed to sell electricity produced within the GridX embedded generation system.
- 6 Infigen Energy acquired Alinta Energy Services in March 2010, renaming the subsidiary to Infigen Energy Markets.
- 7 South Australia Electricity, New South Wales Electricity, Victoria Electricity and Queensland Electricity were each renamed Lumo Energy in July 2010.

Source: ESAA Electricity Gas Australia 2012, valid at 31 March 2012.

Of the 36 retailers included in the study, 14 are 'gentailers' (vertically integrated companies, or retailers with generation assets), shown in Table 2 below.

Table 2: Gentailers

AGL Energy	Ergon Energy
Alinta Energy	ERM Power
Aurora Energy	Essential Energy
CS Energy	Infigen Energy Markets
Delta Electricity	Origin Energy
Energy Brix Australia	Energy Australia
Erating Energy	Stanwell Corporation

Source: ESAA Electricity Gas Australia 2012, valid at 31 March 2012

Of the remaining 23 pure retailers, 4 are owned or partly-owned by a gentailer in the above table and 4 are owned by other electricity generation companies. Details of these ownership structures are shown in Table 3 below.

Table 3: Retailers that are owned by gentailers or generators

Retailers	Gentailers	Relationship	Degree of ownership
ActewAGL	AGL Energy*	Joint venture	50%
Cogent Energy	Origin Energy*	Subsidiary	100%
Lumo Energy ⁷	Infratil	Subsidiary	100%
Momentum Energy	Hydro Tas	Subsidiary	100%



Retailers	Gen-tailers	Relationship	Degree of ownership
Neighbourhood Energy	Alinta Energy*	Subsidiary	100%
Powerdirect	AGL Energy*	Subsidiary	100%
Red Energy	Snowy Hydro	Subsidiary	100%
Simply Energy	International Power GDF SUEZ	Subsidiary	100%
TrustPower Australia	TrustPower NZ Infratil	Joint venture	16.5% 50.5%

* Included in this study

Source: ESAA Electricity Gas Australia 2012, valid at 31 March 2012

4.2 FUEL MIX

4.2.1 Generation assets

As noted above, this study found that information on the fuel mix of electricity sold by retailers is not publically available. In its absence, we have reported on the ownership of generation assets, but it should be remembered that this may not reflect the emissions intensity of the electricity sold.

Information on generation assets was available for 19 of the retailers included in the study from the Energy Supply Association of Australia website. Included are the generation assets owned by the parent companies of 5 retailers, as indicated in Table 4.

Eleven companies have renewable energy generation assets. Two of these have both wind and hydro assets (AGL Energy and Origin). A further 2 companies have wind assets (Infigen and TrustPower), while 7 have hydro assets (CS Energy, Delta Electricity, Eraring Energy, Momentum Energy, Red Energy, Stanwell Corporation and Energy Australia).

Three companies include coal seam gas (CSG) amongst their generation assets: AGL Energy, Origin and Stanwell.

Table 4: Generation assets of retailers

Retailers	Capacity of Generation Assets (MW and as proportion of total generation capacity ⁴)							
	Brown coal	Black coal	Natural gas	CSG	Oil & products	Bio-energy	Hydro	Wind
AGL Energy	2,180 (41%)		1,728 (32%)	252 (5%)		37†^ (1%)	757 (14%)	389 (7%)
Alinta Energy	780 (33%)		1,558^ (67%)					
Aurora Energy			583 (100%)					
Cogent Energy			1.6* (100%)					
CS Energy		4,030 (89%)			14 (0.3%)		500 (11%)	
Delta Electricity		1,920 (74%)	668 (26%)					

⁴ Note that the proportion of generation capacity is not the same as the proportion of energy supplied. Gas and hydro generators in particular may operate as peaking stations, and run for as little as 15% of the time, while wind generators generally have output equivalent 35% of the time at full power. It was beyond the scope of this project to calculate energy contribution different generation assets. In general, the proportion of energy supplied from wind, hydro, and gas will be lower than shown here.



Retailers	Capacity of Generation Assets (MW and as proportion of total generation capacity ⁴)							
	Brown coal	Black coal	Natural gas	CSG	Oil & products	Bio-energy	Hydro	Wind
Diamond Energy						4.4*† (100%)		
Energy Australia	1,480 (32%)	2,387 (52%)	638 (14%)	#			111 (2%)	
Energy Brix	195^ (100%)							
Eraring Energy		2820* (91%)					269 (9%)	
Ergon Energy			57 (100%)					
ERM Power			650 (100%)					
Essential Energy					50 (100%)			
Flinders Power	770* (100%)							
Infigen Energy Markets								509 (100%)
Lumo Energy (Infratil)					136 (100%)			
Momentum Energy (Hydro Tasmania)							2,283 (100%)	
Origin Energy		2,780 (53%)	1,088 (21%)	630 (12%)	423 (8%)		240 (5%)	42 (1%)
OzGen Retail (InterGen)		852 (100%)						
Red Energy (Snowy Hydro)			620 (14%)				3,770 (86%)	
Stanwell Corporation		3,923 (84%)	158 (3%)	385 (8%)	49 (1%)		144 (3%)	
Simply Energy (IP-GDF SUEZ)	1,000 (52%)		747.5 (39%)		113 (6%)			45 (2%)
TrustPower (TrustPower NZ)								99 (100%)

* AEMO Electricity Generation Information lists additional assets to those in ESAA data and so has been included here.

† AGL Energy's bioenergy fuel source is Bagasse, Diamond Energy's bioenergy fuel source is Sewage/waste water.

^ Includes cogeneration

The AER State of the Energy Market 2011 report states: "TRUenergy, a third major retailer and generator in eastern Australia, acquired an interest in New South Wales CSG reserves in 2011. (In addition, the sustainability page of TRUenergy website includes a diagram indicating coal seam gas is part of the company's fuel supply)"

Source: ESAA Electricity Gas Australia 2012 Appendix 1: Power stations in Australia 2010-11, by operating company, AEMO Generation Information, July 2012, NSW, QLD, SA, TAS, VIC, Loy Yang Power website www.loyyangpower.com.au/



No retailers report the overall emissions intensity of the electricity they sell. However Annual Reports of some retailers provided information on the average emissions intensity of their generation assets:

- AGL Energy: carbon intensity of AGL's operated portfolio in FY 2012 = 0.35 tCO₂e/MWh (note that this will increase to 1 tCO₂e/MWh in FY 2013, as AGL purchased Loy Yang brown coal power station).
- CS Energy: greenhouse gas intensity of electricity sent out from generation assets = 0.96 tCO₂e/MWh sent out
- Eraring Energy: Greenhouse intensity for 2010/11 = 0.843t CO₂e /MWh (generated)
- HydroTasmania (Momentum Energy): greenhouse gas intensity of electricity sent out from generation assets = 0.0051 t CO₂e /MWh
- International Power GDF Suez (Simply Energy): 1.352 t CO₂e /MWh based on net MWs of capacity owned during the year (Australia region)
- Stanwell Corporation: greenhouse gas intensity of electricity sent out from generation assets = 0.8 tCO₂e /MWh sent out

An aggregation of “pool” emissions for the state of New South Wales is published by the Independent Pricing and Regulatory Tribunal (IPART) in New South Wales as part of its annual report⁵ for the Greenhouse Gas Reduction Scheme, which closed on 1 July 2012. The figure represents the emissions of greenhouse gases of electricity supplied from the ‘pool’ of major power stations serving the NSW electricity grid. The Annual Pool Value is calculated using data supplied to IPART by the operators of the Category B Generating Systems and by the Australian Energy Market Operator. IPART states that as it “receives this data in confidence, only aggregate emissions figures for NSW in a given year may be released”. For 2012 the NSW Pool Coefficient figure was calculated at 0.976t CO₂-e/MWh, which compared to 0.975t CO₂- e/MWh for 2011.

4.3 RENEWABLE ENERGY

4.3.1 Support for the Renewable Energy Target (RET)

Eight of the retailers in this study made a submission to the Climate Change Authority as part of the recent consultation on the Renewable Energy Target⁶. Only 3 companies (AGL Energy, Eraring and Infigen) supported maintaining the target at its current level, and Eraring’s support was qualified. Five contended for a decreased target (Alinta, Ergon, Origin, Stanwell and Energy Australia).

Table 5 provides detail on the various positions on the RET.

⁵ Compliance and Operation of the NSW Greenhouse Gas Reduction Scheme during July 2011 – July 2012 http://www.ipart.nsw.gov.au/Home/Industries/Greenhouse_Gas_Reduction_Scheme/Compliance_and_Operation_of_the_NSW_Greenhouse_Gas_Reduction_Scheme_during_2011_-_July_2012

⁶ The Australian Conservation Foundation has conducted a follow up survey of a number of retailers on their submissions, which may provide more insight into their support for the Renewable Energy Target



Table 5: Retailers' positions on the Renewable Energy Target

Retailers	Position	Summary
AGL Energy	Maintain	Maintain existing target as is (and no projection beyond 2020). Maintain RET in its current form - no adjustment of LRET for project financed by CEFC, no change to list of sources. Phase out solar credit multipliers.
Infigen	Maintain	Maintain target and scheme as is (to increase policy certainty). No need to reduce to minimise price pressure, as cost of LRET is only \$38/household or 2% of residential retail electricity prices. LRET target should only be increased beyond 2020 if carbon price is rescinded or lowered. Don't expand LRET for CEFC activities, but consider again at next review. No need to add additional sources. No new waste coal mine gas included. No use of multipliers. Longer time (3-4 years) between reviews decreases uncertainty.
Eraring	Qualified Maintain	Keep existing target of 20% by 2020, but allow absorbing of baseline generation into LRET to account for lower demand forecast and overshooting of target. Don't switch to targets based on demand. Have less frequent reviews to decrease uncertainty.
Alinta	Decrease	Revise target down to 35,000GWh, to be revisited in 2014, or extend the existing target out to 2030. Policy change to encourage non-wind renewables.
Energy Australia	Decrease	Revise fixed target downward to meet 20%, and move to rolling 3 years of fixed targets adjusted to demand. Don't increase LRET for CEFC activities. Don't use multipliers. Don't use mechanisms to encourage diversity. Change reviews to every 5 years.
Ergon	Decrease	Decrease fixed target to meet 20%. Do not make new target for beyond 2020. Changed fixed to relative but not rolling target. Do not increase LRET target for CEFC activities. Change sources to include waste coal mine gas and others. Roll in SRES into LRET. Maintain two-yearly reviews.
Origin	Decrease	Revise fixed target downward to meet 20%. Need to amend the SRES. Also amend LRET to allow medium-scale solar. Don't adjust LRET for CEFC. Don't use mechanisms to encourage diversity.
Stanwell	Decrease	Revise fixed target downward to meet 20%, and move from fixed to relative target. Roll SRES into LRET. Extend reviews to 4 years. Do not extend target beyond 2020. Don't increase LRET for CEFC activities. Don't use mechanisms to encourage diversity.
Assumed as that of parent company indicated: <i>Cogent Energy (Origin), Neighbourhood Energy (Alinta), Powerdirect (AGL Energy).</i>		
No submission or statement: <i>ActewAGL, Aurora Energy, Australian Power and Gas, Click Energy, COzero Retail, CS Energy, Delta Electricity, Diamond Energy, Dodo Power and Gas, Energy Brix Australia, ERM Power, Essential Energy, Flinders Power, GridX, Lumo Energy, Metered Energy Holdings, Momentum Energy, OzGen Retail, Progressive Green, QUenergy, Red Energy, Sanctuary Energy, Simply Energy, TrustPower Australia, WINenergy.</i>		

Source: Climate Change Authority, RET Issues Paper, Received Submissions

4.3.2 Support for the Carbon Price

Fourteen companies made some reference to the current carbon price, either through a submission to the Department of Climate Change and Energy Efficiency regarding the Clean Energy Package Legislation (CELP Submission), in their latest Annual Report, or on their website. Of these, 7 companies explicitly supported the carbon price, and an additional 1 provided qualified support. Six companies provided no explicit opinion, with only 1 company explicitly opposing the carbon price, as shown in Table 6.



Table 6: Retailers' positions on the Carbon Price

Retailers	Position	Summary
ActewAGL	Support	"ActewAGL has welcomed the Federal Government's Clean Energy Future and intends to work with both the Federal Government and the ACT Government to implement opportunities arising from recent climate change policy initiatives." (<i>Annual Report</i>)
AGL Energy	Support	Supports carbon price, recommends technical rather than policy changes. (<i>CELP Submission</i>)
Alinta Energy	Support	"Alinta commends the Government on the work completed thus far in drafting the CELP... this submission looks to provide comment on specific issues that Alinta Energy judges to be material." These are technical not policy issues. (<i>CELP Submission</i>)
Aurora Energy	Support	"Aurora has supported the introduction of the carbon legislation by educating customers about the impact of the carbon price and the benefits of energy efficiency measures." (<i>Annual Report</i>)
Infigen Energy Markets	Support	"We welcome the introduction of a price on carbon in Australia as a complementary measure to the Large-scale Renewable Energy Target (LRET)." (<i>Annual Report</i>)
Momentum Energy (HydroTasmania)	Support	"We support the implementation of a well-designed carbon price as the basis of Australia's long-term response to climate change." (<i>HydroTas Annual Report</i>)
Powerdirect	Support	Language is mostly positive, with only a reference to contention around the price (no repeating of the arguments against it). (<i>Website</i>)
Delta Electricity	Qualified Support	Delta provides 'qualified' support, based on their proposed amendments (such as lower starting carbon price, removing price cap and floor from the flexible price period, removing limitations on use of international permits, but also not exempting high-emitting sectors). (<i>CELP Submission</i>)
Australian Power and Gas	Neutral	Refers to carbon price as something that has to be dealt with, but no "opinion" expressed. (<i>Annual Report</i>)
CS Energy	Neutral	
Ergon Energy	Neutral	
Stanwell Corporation	Neutral	
Energy Australia	Neutral	Recommends a number of changes, including some policy changes (such as recommends removal of floor price for international permits), but makes no statement of either support or opposition. (<i>CELP Submission</i>)
Origin Energy	Neutral	
ERM Power	Oppose	"As a company dedicated to providing long term energy solutions to business customers we have lobbied strenuously against a tax on a primary business input and for a more measured climate change response more in line with global action." (<i>Annual Report</i>)
Assumed as that of parent company indicated: Cogent Energy (Origin), Neighbourhood Energy (Alinta).		
No submission or statement: Click Energy, COzero Retail, Diamond Energy, Dodo Power and Gas, Energy Brix Australia, Eraring Energy, Essential Energy, Flinders Power, GridX, Metered Energy Holdings, OzGen Retail, Progressive Green, QUenergy, Red Energy, Sanctuary Energy, Simply Energy, TrustPower Australia, WINenergy.		

Source: Department of Climate Change and Energy Efficiency, Clean Energy Legislative Package Public submissions, or Company Annual Reports/Websites, as indicated.



4.3.3 GreenPower Sales

Details of GreenPower sales are provided by the Federal Government through the National GreenPower Accreditation Program annual audit. As illustrated in

Table 7, 18 retailers had GreenPower sales recorded. Where possible, to provide context for the amount of GreenPower sales, total 2011 sales of GreenPower for each retailer are expressed as a proportion of total electricity sales (or similar measure as noted from Annual Report⁷). This information was only available for 6 out of the 18 GreenPower retailers.

Table 7: GreenPower Sales of Retailers compared to total electricity sales

Retailers	2011 Sales (GWh)		GreenPower as % of all electricity
	Green Power	All Electricity	
Origin Energy	804.5	25,000 ⁸ (total sales)	3.2%
AGL Energy	255.6	14,674 (consumer market electricity volume)	1.7%
ERM Power	34.5	8,300 (sales volume)	0.4%
Aurora Energy	13.0	12,356 (total sales of electricity)	0.1%
ActewAGL	86.0	Unknown	
Alinta Energy	0.5		
Australian Power and Gas	6.6		
Click Energy	0.2		
COzero Retail	86.6		
Dodo Power and Gas	0.02		
Energy Australia	354.5		
Ergon Energy	59.2		
Momentum Energy	31.3		
Neighbourhood Energy	0.9		
Progressive Green	1.3		
Red Energy	5.2		
Simply Energy	30.5		

Source: National GreenPower Accreditation Program Status Report Q4, 2011, company Annual Reports.

4.3.4 Residential Distributed Generation (Solar PV feed-in tariffs)

Seventeen of the retailers in this study provided details on their website of solar photovoltaic feed-in tariffs for residential customers. Of these, 4 did not provide any additional tariffs above government mandated retailer tariffs (Essential Energy, QEnergy, Sanctuary Energy and Simply Energy).

Of the companies providing feed-in tariffs, the majority did so at a set 'cents per kilowatt hour' (c/kWh) rate. 4 companies offered a 1:1 to rate (ActewAGL in ACT, and Australian Power and Gas, Neighbourhood Energy and WINenergy in VIC), meaning that the feed-in tariff was equivalent to the price of electricity paid by the customer.

⁷ This is the amount reported in the company's latest Annual Report. Note that ActewAGL and Ergon provided the systems throughput on their distribution networks, but not their retail sales.

⁸ Total Sales reported as 90 PJe (1 TWh of electricity = 3.6 PJe).



In total 1 retailer offered an additional voluntary feed-in tariff in ACT, 4 in NSW, 5 in QLD, 6 in VIC, 1 in TAS and none in SA – which has the highest government mandated retailer tariffs.

Table 8 shows the voluntary solar feed-in tariffs provided by retailers, over and above any government-mandated retailer contributions.

Table 8: Voluntary feed in-tariffs provided by retailers (c/kWh)

Retailers	ACT	NSW	QLD	SA	VIC	TAS
Mandated amount:	0c	0c	8c	9.8c	8c	0c
ActewAGL	1:1					
AGL Energy		\$0.08	\$0.08	\$0.00	\$0.00	
Aurora Energy						1:1
Australian Power and Gas			\$0.00		\$0.00	
Click Energy			\$0.02		\$0.02	
Diamond Energy			\$0.00	\$0.00	\$0.08	
Energy Australia		unknown^	unknown^	\$0.00	\$0.00	
Ergon Energy			\$0.00			
Lumo Energy				\$0.00	\$0.06	
Momentum Energy					unknown^	
Neighbourhood Energy					1:1	
Origin Energy		\$0.06	\$0.06	\$0.00	\$0.00	
Powerdirect		\$0.077	\$0.06	\$0.00	\$0.00	
QEnergy		\$0.00				
Red Energy					\$0.00	
Simply Energy					\$0.00	
WINenergy					1:1	
Number above for state:	1	4	5	0	6	1

Key:

n/a = retailer does not operate in this state

1:1 = Feed-in tariff rate equivalent to the price of retail electricity paid by the customer. For ActewAGL this is between 16c and 24c, for Aurora this is between 12c and 28c, for Neighbourhood Energy between 9c and 30c. (Unknown for WINenergy)

^ Retailer indicates that they pay a feed-in tariff for customers, but do not disclose the amount, instead instructing customers to contact them directly.

Companies who do not provide details of solar feed-in tariffs on their website:

Alinta Energy, Cogent Energy, COzero Retail, CS Energy, Delta Electricity, Dodo Power and Gas, Energy Brix Australia, Eraring Energy, ERM Power, Essential Energy, Infigen Energy Markets, Metered Energy Holdings, Progressive Green, Sanctuary Energy, Stanwell Corporation, TrustPower Australia.

No website:

Flinders Power, GridX, OzGen Retail.

Source: Company websites.



4.4 COMMITMENT TO SUSTAINABILITY

4.4.1 Sustainability Report

The Global Reporting Initiative (GRI) produces one of the most widely regarded voluntary standards for public reporting of sustainability performance. Sustainability reports that follow the GRI Sustainability Reporting Guidelines, and achieve certification by GRI for adherence to the guidelines are generally recognised as having “communicated clearly and openly about sustainability, utilising a globally shared framework of concepts, consistent language, and metrics”⁹. It is for this reason that the achievement of a GRI-compliant Sustainability Report was selected as an indicator of retailers’ commitments to sustainability.

When using the GRI guidelines, an organisation self-declares a reporting level based on its own assessment of its report content against a “GRI Application Level”. Declaring an Application Level results in clear communication about which elements of the GRI Reporting Framework have been applied in the preparation of a report across three levels: C (low coverage of the framework), B (medium coverage of the framework), and A (full coverage of the framework). An organisation can also self-report if they have utilised external assurance¹⁰ using a ‘+’ next to the application level.

GRI’s Sector Supplements are versions of the Sustainability Reporting Guidelines tailored for sectors and capture unique sustainability issues that may not be covered in the original Reporting Guidelines. The Electric Utilities Sector Supplement (EUSS) provides reporting guidance on key aspects of sustainability performance that is meaningful and relevant for organisations engaged in the generation, transmission, distribution or retail of electricity¹¹.

As illustrated in Table 9, 15 companies formally reported on at least some elements of sustainability. Of these, 10 companies reported against the Global Reporting Initiative (GRI) guidelines. A further 3 companies produced Sustainability Reports independently of the GRI guidelines, and 2 companies incorporated some elements of sustainability into their Annual Report.

Table 9: Retailers which publish a Sustainability Report

Retailers	Type of Report	GRI level		
		Electric Utilities supplement used	Application Level	Independently verified
AGL Energy	GRI	Yes	A	Yes
Momentum Energy* (HydroTasmania)	GRI	Yes	A	Yes
Aurora Energy*	GRI	Yes	B	Yes
Energy Australia	GRI	Yes	B	Yes
Erating Energy	GRI	Yes	B	Yes
Delta Electricity	GRI	Yes	B	No
Ergon Energy*	GRI	Yes	B	No
Origin Energy	GRI	Yes	Unreported	No
TrustPower Australia* (TrustPower NZ)	GRI	No	B	No
ActewAGL	GRI	No	C	Yes

⁹ GRI Sustainability Reporting Guidelines

¹⁰ GRI Sustainability Reporting Guidelines

¹¹ GRI Electric Utilities Sector Supplement



Retailers	Type of Report	GRI level		
		Electric Utilities supplement used	Application Level	Independently verified
Australian Power and Gas*	Non GRI			
Essential Energy*	Non GRI			
Infigen Energy Markets*	Non GRI			
Simply Energy (IP-GDF SUEZ)	Non GRI			
CS Energy	Limited^			
Stanwell Corporation	Limited^			
* Produces an Integrated Annual and Sustainability Report.				
^ Annual Report contains some elements of sustainability reporting, but does not have a formal Sustainability Report integrated into the Annual Report or published separately.				
Assumed as that of parent company indicated: Cogent Energy (Origin), Neighbourhood Energy (Alinta), Powerdirect (AGL Energy).				
Companies who do not publish a Sustainability Report: Alinta Energy, Click Energy, COzero Retail, Diamond Energy, Dodo Power and Gas, Energy Brix Australia, ERM Power, Lumo Energy, Metered Energy Holdings, Progressive Green, QEnergy, Red Energy, Sanctuary Energy, WINenergy.				
No website: Flinders Power, GridX, OzGen Retail.				

Source: Company websites, Annual Reports and Sustainability Reports.

4.4.2 Environmental Policy

Another common criteria utilised in identifying commitment to sustainability is the presence of an Environmental Policy. For example, GRI include as one of their criteria in the Sustainability Reporting Guidelines the development of a “brief, organization-wide policy or policies that defines the organizations overall commitment related to Environmental Aspects in the public domain”¹². Therefore research was conducted to determine which retailers had an Environmental Policy in the public domain.

Less than half of the retailers in the study (11 out of 36) have demonstrated commitment to reducing their environmental impact through a public Environmental Policy. The policies identified range from formal policies with targets, implementation strategies and monitoring processes, to a one page set of principles, to a combined one-page Health, Safety and Environment (or similar) policy with limited reference to the environment. One company had a very comprehensive environmental policy on their website, but which was 2 years out of date (ActewAGL). Table 10 provides details of the publicly-available environmental policies of Australian electricity retailers.

¹² GRI Sustainability Reporting Guidelines



Table 10: Retailers which publish an environmental or sustainability policy

Retailers	Published Policy	Notes
Stanwell Corporation	Yes	Publishes a formal policy with oversight/ implementation responsibilities detailed.
Energy Australia	Yes	Details a Sustainability Framework with targets in Annual Report (though no formal policy document published). Also has a specific Climate Change strategy on the company website.
Aurora Energy	Yes	Publishes a one page, standalone Environment policy.
CS Energy	Yes	
Delta Electricity	Yes	
Ergon Energy	Yes	
Momentum Energy	Yes	
TrustPower Australia	Yes	
AGL Energy	Partial	Publishes a one page combined Health, Safety and Environment (or similar) policy.
ERM Power	Partial	
Essential Energy	Partial	
ActewAGL	Partial	Publishes a comprehensive, but out-of-date Environmental Management Plan (2005-2010)
Assumed as that of parent company indicated: <i>Cogent Energy (Origin), Neighbourhood Energy (Alinta), Powerdirect (AGL Energy).</i>		
Companies who do not publish an Environmental or Sustainability Policy: <i>Alinta Energy, Australian Power and Gas, Click Energy, COzero Retail, Diamond Energy, Dodo Power and Gas, Energy Brix Australia, Eraring Energy, Infigen Energy Markets, Lumo Energy, Metered Energy Holdings, Origin Energy, Progressive Green, QEnergy, Red Energy, Sanctuary Energy, Simply Energy, WINenergy.</i>		
No website: <i>Flinders Power, GridX, OzGen Retail.</i>		

Source: Company websites.

4.4.3 Environmental Management System

An Environment Management System (EMS) is a tool for managing the impacts of an organisation's activities on the environment. It provides a structured approach to planning and implementing environment protection measures¹³. It is widely recognised that accreditation to an International Standard represents processes and that meet an internationally-recognised standard and certification. ISO 14001:2004 sets out the criteria for an EMS and can be used by any organization regardless of its activity or sector. Using ISO 14001:2004 can provide assurance to company management and employees as well as external stakeholders that environmental impact is being measured and improved¹⁴. Research was therefore conducted into which retailers had in place an EMS and whether it was an ISO14001 certified EMS.

Table 11 shows that 9 of the retailers have an EMS certified to ISO14001 standards and two have publicly reported their systems “conform” to these standards. The remaining retailers have no public information stating that an EMS is in place for their operations.

¹³ <http://www.environment.gov.au/land/management/ems/index.html>

¹⁴ ISO 14000 Environmental Management guidelines



Table 11: Retailers with an ISO 14001 Environmental Management System (EMS)

Retailers	ISO 14001 EMS	Notes
Aurora Energy	Yes	Has an accredited ISO 14001 Environmental Management System in place.
CS Energy	Yes	
Delta Electricity	Yes	
Ergon Energy	Yes	
Energy Australia	Yes	
Essential Energy	Yes	
Momentum Energy (HydroTasmania)	Yes	
Simply Energy (IP-GDF SUEZ)	Yes	
Stanwell Corporation	Yes	
AGL Energy	Partial	Website states that HSE management system is "based on" ISO 14001, but no details of accreditation provided.
Eraring Energy	Partial	Website states that Environmental Policy "conforms to" ISO 14001, but no details of accreditation provided.
Assumed as that of parent company: <i>Cogent Energy (Origin), Neighbourhood Energy (Alinta), Powerdirect (AGL Energy).</i>		
Companies who do have an ISO 14001 accredited Environmental Management System: <i>ActewAGL, Alinta Energy, Australian Power and Gas, Click Energy, COzero Retail, Diamond Energy, Dodo Power and Gas, Energy Brix Australia, ERM Power, Infigen Energy Markets, Lumo Energy, Metered Energy Holdings, Origin Energy, Progressive Green, QEnergy, Red Energy, Sanctuary Energy, TrustPower Australia, WINenergy.</i>		
No website: <i>Flinders Power, GridX, OzGen Retail.</i>		

Source: Company websites, Annual Reports and Sustainability Reports.

4.4.4 Sustainability Benchmarks and Initiatives

There are a number of sustainability benchmarks which can demonstrate best practice of corporate sustainability performance or social responsibility. The benchmarks and initiatives considered in these categories are:

- Clean Energy Council (clean and renewable energy)
- Carbon Disclosure Project (carbon emissions)
- Dow Jones Sustainability Index (general sustainability)
- FTSE4Good Index (general sustainability)

Table 12 below provides detail of electricity retailers who are members of or participate in these sustainability benchmarks or initiatives.



Table 12: Retailers who participate in sustainability benchmarks or initiatives

Retailers	Clean Energy Council member	Reports to Carbon Disclosure Project	Part of Dow Jones Sustainability Index	Part of FTSE4 Good Index
AGL Energy	Yes [^]	Yes	Yes	Yes
Energy Australia	Yes			
Essential Energy	Yes			
Infigen Energy Markets	Yes [^]	Yes		
Momentum Energy (HydroTasmania)	Yes [^]			
Origin Energy		Yes	Yes	Yes
Red Energy (Snowy Hydro)	Yes			
Stanwell Corporation	Yes			
TrustPower Australia	Yes	(Declined)		
[^] Sponsoring member of Clean Energy Council				
Assumed as that of parent company indicated: Cogent Energy (Origin), Neighbourhood Energy (Alinta), Powerdirect (AGL Energy).				
Companies who do not participate in external benchmarking systems: ActewAGL, Alinta Energy (who explicitly declined to participate in CDP), Aurora Energy (who explicitly declined to participate in CDP), Australian Power and Gas, Click Energy, COzero Retail, CS Energy, Delta Electricity, Diamond Energy, Dodo Power and Gas, Energy Brix Australia, Eraring Energy, Ergon Energy, ERM Power, Lumo Energy, Metered Energy Holdings, Progressive Green, QEnergy, Sanctuary Energy, Simply Energy, WINenergy.				
No website: Flinders Power, GridX, OzGen Retail.				

Source: Clean Energy Council website and Carbon Disclosure Project website for respective initiatives. Information on participation in DJSI and FTSE4Good is taken from company websites and Annual Reports.



5 SUMMARY OF FINDINGS & CONCLUSIONS

It is not possible to calculate the emissions intensity or fuel mix of the electricity sold by particular retailers from publicly available information. In addition, the total retail sales to customers reported by electricity retailers is available for only 4 out of 36 retailers (from Annual reports), although data on GreenPower sales are available for all retailers. Thus it is not generally possible to report the percentage which GreenPower contributes to sales.

Approximately 33% of licensed electricity retailers provide a solar feed-in tariff above the mandated tariff, 19% publicly offer the mandated tariff, leaving 58% of retailers in Australia who do not provide consumers with information on feed in tariffs, although presumably they will offer the mandated feed in tariff if approached.

Only three retailers publicly supported maintaining the RET, AGL, Infigen, and Eraring (qualified support), with Alinta, Ergon, Origin, Stanwell, and Energy Australia advocating for a decrease. Support for the carbon price was higher, with seven retailers offering support (AGL, ActewAGL, Alinta, Aurora, Infigen, Momentum, and Powerdirect). Altogether 69% of retailers disclose public positions towards legislation that support renewable sources of energy (RET) or penalise high emission generation sources (carbon price), leaving 31% silent on their position to these regulations.

The two retailers that perform the highest with respect to sustainability reporting (i.e. a report independently certified to GRI "A" application level) have different characteristics, with AGL Energy as a gentailer operating in all six states and Metered Energy Holdings operating in only NSW as a pure retailer. All retailers who participate in sustainability benchmarks are also gentailers (with Momentum Energy, TrustPower and Red Energy being subsidiaries of gentailers).

In the absence of available data on fuel mix, the ownership of generation assets was detailed. Almost half of licensed electricity retailers in Australia are "gentailers", that is, they own or operate electricity generators as well as selling electricity to the public.

As shown in Table 13, only two retailers (AGL Energy and Energy Australia) have disclosed information on all of the renewable energy and general sustainability criteria analysed in this study. This is not surprising given the size and resources available to these larger companies, who are gentailers and operate in all six states of the NEM. Aurora and Ergon Energy have disclosed information on all but one of the renewable energy and general sustainability criteria analysed in this study, however Ergon Energy only operates in one state (Queensland).

The findings of this report are in line with the findings of the NEM Report Card study completed by ISF and Monash University for the Total Environment Centre in 2011 which found limited publicly available data on the performance of the NEM in relation to the long term interest of consumers. The NEM Report Card recommended additional criteria be included in the National Electricity Objective to require relevant, reliable and consistent data be collected and reported on a range of social and environmental criteria including greenhouse gas emissions (emissions intensity and emissions per unit of energy generated), demand management, energy efficiency and renewable energy¹⁵.

The results of this report provide a strong case for further analysis, as Australian consumers have the right to know the carbon intensity of the electricity they purchase. In the short term, this could be achieved by a survey of electricity retailers. An Electricity Retailer Survey could provide a ranking of environmental performance of suppliers in the National Electricity

¹⁵ *The NEM Report Card: How well does the National Electricity Market serve Australia?* ISF, Monash and Total Environment Centre, 2011.



Market. The ranking could employ a criteria and weighting system based on three areas; fuel mix, renewable energy commitment, and energy saving commitment. The final result, a report, could provide a separate ranking in each of the three areas.

- 1) ***How clean is their electricity?*** This would request specific information on the fuel mix and emissions intensity of the electricity sold by each retailer, including:
 - a. What proportion of your electricity sales are sourced from each of the following: black coal, brown coal, conventional natural gas, coal mine methane, coal seam methane, oil/ LPG, hydro, bioenergy, wind, solar PV?
 - b. If the emissions intensity of fossil fuel generation is different from the relevant State average, please provide calculations to indicate the figure that should be used.
- 2) ***Do they support renewable electricity in Australia?***
 - a. Further to responses to the RET, feed-in-tariffs and GreenPower that are publicly available, what additional support do retailers offer for renewable energy?
- 3) ***Do they help customers save electricity?*** A key gap of the Electricity Retailer Disclosure study was the commitment to energy efficiency. Reducing electricity consumption is important in assessing retailer's performance, as retailers are in a unique position to promote initiatives to their customers. Key research questions are:
 - What energy savings initiatives do retailers offer customers? (note that the costing assumes this is restricted to residential customers)
 - How do they ask customers to pay for the initiatives?
 - How actively do they promote energy savings initiatives?

These questions can be addressed via a number of research methods such as:

- a scan of publicly-available information on existing energy efficiency schemes (e.g. VEET in Victoria, REES in South Australia, ESS in New South Wales etc.), which may yield quantitative data on MWh reduction achieved by retailers or their partners
- an initial evaluation of website content for demand reduction initiatives offered, and payment options for customers
- direct questions in the retailer survey.

However, in order to make this information available on an ongoing basis, to avoid the issue that potential competitive disadvantage may discourage full disclosure, and to ensure consistency in the information available for each retailer, it would be preferable if provision of this information was regulated. This reform would facilitate more informed consumer electricity purchases. It remains the responsibility of the Australian Energy Regulator to make such disclosure mandatory, as is the case in other parts of the world. Additionally NGOs such as TEC should consider continuing to report on retailer environmental, renewable energy policy and sustainability positions.



Table 13: Summary Table of Study Findings

Retailer ¹	Scope of operations	Ownership of Generation Assets			Renewable Energy				General Sustainability			
		Total capacity (MW)	Proportion of capacity from Renewables ²	Proportion of capacity from Fossil Fuels ²	Public position on RET	Public position on Carbon Price	Green Power	Solar PV Feed-in Tariff ³	Sustainability Report	Environment Policy	ISO 14001 EMS	Benchmarks
ActewAGL [^]	ACT, NSW	(As per AGL)				Support	Yes	1:1	GRI C+	Partial		
AGL Energy*	ACT, NSW, QLD, SA, TAS, VIC	5,343	22%	78%	Maintain	Support	Yes	Above mandated	GRI A+	Partial	Partial	Yes
Alinta Energy*	QLD, SA, VIC	2,338	0%	100%	Decrease	Support	Yes			Partial	Partial	
Aurora Energy*	ACT, NSW, QLD, SA, TAS, VIC	583	0%	100%		Support	Yes	1:1	GRI B+	Yes	Yes	Yes
Australian Power & Gas	ACT, NSW, QLD, SA, VIC					Neutral	Yes		Non-GRI			
Click Energy	QLD, VIC						Yes	Above mandated			Yes	
Cogent Energy [^]	NSW, SA, VIC	(As per Origin)										
COzero Retail	ACT, QLD						Yes					
CS Energy*	QLD	4,544	11%	89%		Neutral				Yes	Yes	
Delta Electricity*	NSW	2,588	0%	100%		Qualified Support			GRI B	Yes	Yes	
Diamond Energy	NSW, QLD, SA, VIC	4.4	100%	0%				Above mandated				
Dodo Power and Gas	ACT, NSW, QLD, SA, VIC						Yes					
Energy Australia*	ACT, NSW, QLD, SA, TAS, VIC	4,616	2%	98%	Decrease	Neutral	Yes	Above mandated	GRI B+	Partial	Yes	Yes
Energy Brix Australia*	VIC	195	0%	100%								
Eraring Energy*	NSW	3,089	9%	91%	Maintain				GRI B+		Partial	
Ergon Energy*	QLD	57	0%	100%	Decrease	Neutral	Yes		GRI B	Yes	Yes	
ERM Power*	ACT, NSW, QLD, SA, TAS, VIC	650	0%	100%		Oppose	Yes			Partial		
Essential Energy*	ACT, TAS	50	0%	100%					Non-GRI	Partial	Yes	Yes
Flinders Power	QLD, SA	770	0%	100%								
GridX	NSW											
Infigen Energy Markets*	NSW	509	100%	0%	Maintain	Support			Non-GRI			Yes
Lumo Energy [^]	NSW, QLD, SA, VIC	136	0%	100%				Above mandated				
Metered Energy Holdings	NSW								GRI A+			
Momentum Energy [^]	ACT, NSW, QLD, SA, VIC	2,283	100%	0%		Support	Yes	Above mandated		Yes	Yes	Yes
Neighbourhood Energy [^]	VIC	(As per Alinta)					Yes	1:1				
Origin Energy*	ACT, NSW, QLD, SA, VIC	5,203	6%	94%	Decrease	Neutral	Yes	Above mandated				Yes
OzGen Retail*	QLD, VIC	852	0%	100%								
Powerdirect [^]	ACT, NSW, QLD, SA, VIC	(As per AGL)				Support		Above mandated				
Progressive Green	VIC						Yes					
QEnergy	QLD											
Red Energy [^]	ACT, NSW, QLD, SA, VIC	4,390	86%	14%			Yes					Yes
Sanctuary Energy	NSW, QLD, SA											
Simply Energy [^]	NSW, QLD, SA, VIC	1,905	2%	98%			Yes		Non-GRI		Yes	
Stanwell Corporation*	NSW, QLD	4,659	3%	97%	Decrease	Neutral				Yes	Yes	Yes
TrustPower Australia [^]	SA	99	100%	0%					GRI B	Yes		Yes
WINenergy	NSW							1:1				

¹ Retail operations only unless otherwise specified as follows:

* 'gentailers' (vertically integrated companies or retailers with generation asset) – see Table 2

[^] owned or partly-owned by a gentailer or owned by other electricity generation company – see Table 3

² % of capacity, not energy generated, which will tend to exaggerate the % of renewable capacity

³ 1:1 means the retailer offers the retail electricity price for solar electricity exported to the grid



6 REFERENCES

6.1 GENERAL REFERENCES

- *AEMO Generation Information, July 2012, NSW, QLD, SA, TAS, VIC*
<http://www.aemo.com.au/Electricity/Planning/Related-Information/Generation-Information>
- *Carbon Disclosure Project responses*
<https://www.cdproject.net/en-US/Results/Pages/overview.aspx>
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www.cleanenergycouncil.org.au/aboutus/membership/currentmembers.html
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Department of Climate Change and Energy Efficiency
www.climatechange.gov.au/government/submissions/closed-consultations/clean-energy-legislative-package/public-submissions.aspx
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www.esaa.com.au/content/detail/electricity_gas_australia_2012
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Australian Energy Market Operator (AEMO)
www.aemo.com.au/Electricity/Planning/Related-Information/Generation-Information
- *GRI Sustainability Reporting Guidelines*
<https://www.globalreporting.org/resource/library/G3.1-Guidelines-Incl-Technical-Protocol.pdf>
- *GRI Sustainability Reporting Guidelines – Energy Sector Supplement*
<https://www.globalreporting.org/resource/library/EUSS-Complete.pdf>
- *ISO14001 Environmental Management System guidelines*
<http://www.iso.org/iso/home/standards/management-standards/iso14000.htm>
- *National GreenPower Accreditation Program Status Report Quarter 4, 2011*
NSW Department of Trade & Investment
www.greenpower.gov.au/Business-Centre/Quarterly-Reports
- *State of the Energy Market 2011*
Australian Energy Regulator
www.aer.gov.au/sites/default/files/State%20of%20the%20energy%20market%202011%20-%20complete%20report.pdf
- *RET Issues Paper Submissions Received*
Climate Change Authority
<http://climatechangeauthority.gov.au/submissions/received>



6.2 COMPANY WEBSITES AND REPORTS

Table 14: Company-specific sources of information

Retailer	Sources
ActewAGL	<ul style="list-style-type: none"> Company website: www.actewAGL Energy.com.au Annual Report 2011-12 Sustainability Report 2010-11 Environment Management Plan 2005-2010
AGL Energy	<ul style="list-style-type: none"> Company website: www.AGL Energy.com.au Annual Report 2012 Sustainability Report 2011 Health Safety Environment Policy <ul style="list-style-type: none"> Loy Yang Power website: www.loyyangpower.com.au
Alinta Energy	<ul style="list-style-type: none"> Company website: www.alinta.net.au Environment Policy (from www.epa.wa.gov.au)
Aurora Energy	<ul style="list-style-type: none"> Company website: www.auroraenergy.com.au Annual Report 2012 GRI Index Table Sustainability Policy
Australian Power and Gas	<ul style="list-style-type: none"> Company website: www.australianpowerandgas.com.au
Click Energy	<ul style="list-style-type: none"> Company website: www.clickenergy.com.au
Cogent Energy	<ul style="list-style-type: none"> Company website: www.cogentenergy.com.au
COzero Retail	None.
CS Energy	<ul style="list-style-type: none"> Company website: www.csenergy.com.au Annual Report 2011-2012 Environment Policy
Delta Electricity	<ul style="list-style-type: none"> Company website: www.de.com.au Annual Report 2011 Sustainability Report 2011 Sustainability Policy 2010
Diamond Energy	<ul style="list-style-type: none"> Company website: www.diamondenergy.com.au
Dodo Power and Gas	<ul style="list-style-type: none"> Company website: www.dodo.com
Energy Brix Australia	<ul style="list-style-type: none"> Company website: www.ebac.com.au
Eraring Energy	<ul style="list-style-type: none"> Company website: www.eraring-energy.com.au Annual Report 2011 Sustainability Report 2011 Environment Policy Poster 2010
Ergon Energy	<ul style="list-style-type: none"> Company website: www.ergon.com.au Annual Stakeholder Report 2012 Global Reporting Initiative Index 2012 Environment and Cultural Heritage Policy
ERM Power	<ul style="list-style-type: none"> Company website: www.ermpower.com.au Annual Report 2012 Shareholder Review 2012 Health, Safety, Environment and Sustainability Policy
Essential Energy	<ul style="list-style-type: none"> Company website: www.essentialenergy.com.au Annual Report 2011 Safety, Security, Health and Environmental Policy
Flinders Power	None.
GridX	None. (Company holding page only at www.gridxpower.com , no website)



Retailer	Sources
Infigen Energy Markets	<ul style="list-style-type: none"> • Company website: www.infigenenergy.com • Annual Report 2012 • Sustainability Report • Environment Policy
Lumo Energy	<ul style="list-style-type: none"> • Company website: www.lumoenergy.com.au • Parent Company website: www.infratil.com • Infratil Annual Report 2012
Metered Energy Holdings	<ul style="list-style-type: none"> • Company website: www.meteredenergy.com.au
Momentum Energy	<ul style="list-style-type: none"> • Company website: www.momentumenergy.com.au • Parent Company website: www.hydro.com.au • Hydro Tasmania Annual Report 2012 • Momentum Environment Policy • Hydro Tasmania Group Sustainability Code
Neighbourhood Energy	<ul style="list-style-type: none"> • Company website: www.neighbourhood.com.au
Origin Energy	<ul style="list-style-type: none"> • Company website: www.originenergy.com.au • Annual Report 2012 • Shareholder Review 2012 • Sustainability Report 2012
OzGen Retail	<ul style="list-style-type: none"> • Parent company website: www.intergen.com
Powerdirect	<ul style="list-style-type: none"> • Company website: www.powerdirect.com.au • Carbon Price Information Booklet 2012
Progressive Green	<ul style="list-style-type: none"> • Company website: www.progressivegreen.com.au
QEnergy	<ul style="list-style-type: none"> • Company website: www.qenergy.com.au
Red Energy	<ul style="list-style-type: none"> • Company website: www.redenergy.com.au • Parent Company website: www.snowyhydro.com.au • Snowy Hydro Annual Report 2012
Sanctuary Energy	<ul style="list-style-type: none"> • Company website: www.sanctuaryenergy.com.au
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WINenergy	<ul style="list-style-type: none"> • Company website: www.winenergy.com.au





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