

3 December 2018

Victorian Department of Environment,
Land, Water and Planning

By email: energy.upgrades@delwp.vic.gov.au



Victorian Energy Upgrades - Review of Victorian Energy Efficiency Target Regulations 2018

Dear Sir/Madam

Gas Energy Australia (GEA) welcomes the opportunity to provide comments in response to the consultation on the Department of Environment, Land, Water and Planning's Victorian Energy Upgrades program *Victorian Energy Efficiency Target Regulations 2018*.

By way of background, GEA is the national peak body, which represents the bulk of the downstream alternative gaseous fuels industry, which covers Liquefied Petroleum Gas (LPG), Liquefied Natural Gas (LNG) and Compressed Natural Gas (CNG). The industry comprises major companies and small to medium businesses in the gaseous fuels supply chain including producers, refiners, distributors, transporters, retailers, vehicle manufacturers, equipment manufacturers and suppliers, installers, educators and consultants.

The members and associates of GEA support efforts to improve the energy efficiency of homes and businesses through the Victorian Energy Upgrades program. Recently, Australia has seen unprecedented and accelerated change in energy markets and technologies. Consequently, governments must ensure that energy policy is technology neutral to ensure research into alternative energy technologies is maintained and encouraged.

The emergence of new alternative fuels such as biogas and innovative applications of existing gaseous fuels, including combining them with renewables and fuel cells, demonstrates the importance of maintaining a technology neutral approach to energy policy to encourage the development of cost effective low emissions alternatives.

GEA considers gaseous fuels have an important role to play in Australia's making an affordable transition to a low carbon economy, particularly in colder climates such as Victoria. The availability of particular technologies to attract multiple incentives, compared to others only being eligible for one raises doubts about the technology neutrality of current policies aimed at improving energy efficiency.

GEA considers equal treatment of all technology options to be essential and supports a technology neutral approach to improving energy efficiency and considers this critical to maintaining consumer choice and continued research and development in new low-emissions technologies.

For your consideration.

A handwritten signature in black ink, appearing to read "John Griffiths", with a long horizontal flourish extending to the right.

John Griffiths
Chief Executive Officer