

Energy (Renewable Transformation and Jobs) Bill 2023

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We welcome the opportunity to respond to the final Energy (Renewable Transformation and Jobs) Bill 2023. Queensland Conservation Council presents this submission on behalf of conservation and advocacy groups from around Queensland. Our communities are already suffering the impacts of climate change, from flooded homes to ecosystems at risk. We desperately need to take action to reduce emissions rapidly. Renewable energy is one of the best ways we can do this. We were very pleased that the 2022 Queensland Energy and Jobs Plan provided a path to end Queensland's expensive and dangerous reliance on coal fired power.

Renewable energy is key but not being delivered fast enough

The renewable energy targets in the Bill are still not consistent with a path to limit warming to 1.5 degrees¹. We hope that the recently announced Capacity Investment Scheme and Queensland's developing Renewable Energy Zone frameworks can work together to ensure that renewable energy is built to meet the system needs and decarbonise our energy.

We urge the Government and Opposition to support this bill, and accelerate the development of REZ readiness frameworks to ensure the transition to renewable energy benefits nature, communities and climate.

We wholeheartedly support the key tenets of the Energy Bill to:

- enshrine key commitments from the Queensland Energy and Jobs Plan in law:
- create the infrastructure frameworks needed to build the Queensland SuperGrid and
- establish the governance and advisory functions for a smooth, coordinated transformation to support workers and communities.

We need a better Renewable Energy Zone framework

An effective Renewable Energy Zone framework can provide the leadership and direction needed to deliver the best outcomes for nature and communities in the renewable energy transition, at the speed we need to avoid catastrophic climate change.

We urge the Government to prioritise information and engagement that will be able to facilitate the delivery of Renewable Energy Zones, once able to be declared under this Bill, including:

- The review of the planning framework as promised in the Queensland Energy and Jobs Plan.

¹ For Australia to meet a 1.5 degree aligned pathway, we need to reach at least 67% reduction on 2005 levels by 2030 and net zero by 2038

https://www.climate-resource.com/reports/wwf/20230612_WWF-Aus-Targets.pdf

- Land-use, biodiversity and cultural heritage mapping, which is ground-truthed, that guides the Renewable Energy Zone development and shows renewable energy developers where to site and build projects.
- An accountability mechanism to ensure that any project delivered or backed by a government-owned corporation genuinely delivers on the Regional Energy Transformation Partnerships Framework principles to empower communities, build local industry and protect nature, in advance of applying this condition to all projects in Renewable Energy Zones.
- Community reference groups that are empowered to provide advice on development of projects and strategically allocate funds to deliver long term benefits.
- A framework, developed with local community reference and conservation groups to identify and implement initiatives that improve biodiversity in the regions hosting renewable energy projects.

Many communities around Queensland are already seeing renewable energy development ahead of the Renewable Energy Zone framework. Our existing planning laws require very limited community engagement from developers and don't deliver the strategic planning we need to manage cumulative impacts within regions, and ensure projects are located in the right places.

This is hurting local landholders, neighbours and surrounding communities who are dealing with significant stress and uncertainty, and potentially leading to impacts on Queensland's threatened species in the name of climate action, and risking a slow down of the renewable energy transition by threatening social licence.

Welcome changes from draft to final Bill

We support the changes from the draft Bill to:

- Explicitly include distributed energy resources in renewable energy targets so that Queensland's largest generator, rooftop solar, is cemented in achieving our renewable energy target.
- Include long term contractors in the Job Security Guarantee. The purpose of the Guarantee is to provide certainty to workers in an industry which has been beset by privatisation and use of contractors.
- Extend the consultation on draft REZ management plans to 60 days to provide greater opportunity for detailed community engagement.
- Allow the Minister to require the REZ Delivery Body to consider regional impacts of REZ assessments to get a broader impact assessment.
- Remove technology specific language around reactive power support and storage to avoid locking into an option in a fast developing space.
- Expand the capacity of the Energy System Advisory Council to include First Nations and skilled manufacturing expertise to better represent Queensland's interests.

- Expand the remit of the Renewable Energy Jobs Advocate to include broader consultation and information sharing to attempt to overcome the information gaps and recognise that jobs are an important, but partial, part of long term benefits for communities.

Areas of continuing concern

Lack of information and transparency

The Bill allows Powerlink and the Queensland Government to make significant investment decisions. This could help make faster and more holistic decisions for Queensland. However, new frameworks need to deliver transparency and rigour to scrutinise these decisions. For example, the Supergrid Blueprint proposes a 500 kV transmission line up the Queensland coast, based on modelling conducted by EY that has not been made public, beyond a summary report, for only a base case and the Plan. The modelling demonstrating the need for the largest pumped hydro plant in the world, at Pioneer-Burdekin, as well as Borumba, or the pumped hydro investigation study identifying these two sites as the best in Queensland, has also not been publicly released.

The Government should be working to provide information to a similar standard as released in the Australian Energy Market Operator's Integrated System Plan (ISP). The ISP is required to release its Inputs, Assumptions and Scenarios report and workbook, along with detailed results workbooks setting out demand forecasts, distributed energy forecasts, generator and transmission parameters and interconnector flow results for a range of scenarios.

We urge the Government to release further information on the transmission route options, ways that this will unlock further renewable energy, provide resilience and other benefits to Queensland consumers, and early cost estimates.

We also urge the Government to release further information on costs and particularly the use of the consumer as a backstop cost recovery mechanism.

Lack of regulation and capacity of developers to deliver good outcomes

Even when developers, either public or privately owned, are genuinely committed to community engagement and benefit, there is no framework for cooperation between developers, leading to division and confusion in areas that have high renewable resource and transmission access.

We need stronger and quicker Renewable Energy Zone planning to implement the principles in the Regional Energy Transformation Partnerships Framework.

To do this, there needs to be a significant expansion of capacity in the Energy and Planning Departments, Powerlink and Energy Queensland to build capability to engage in stakeholder

consultation and land use and nature mapping and assessment, to ensure that Powerlink can assess the social and environmental impacts of renewable development as well as the energy system impacts.

Lack of community engagement

The Bill focuses on the technical, financial and regulatory frameworks of Renewable Energy Zones, and the transition of jobs in existing coal fired power stations. REZ will have a material impact on communities and the environment, beyond employment and income. To make sure these are positive impacts, we urge the Government to accelerate and expand their REZ planning approach.

At a minimum, equal standing should be given to jobs, nature and communities from a policy and legislative perspective, including new entities designed to guide communities and protect nature through the transition.

We see a key role for the stakeholder, or community reference groups, flagged in the Local Energy Partnerships Initiative. We urge the Government to set these up as quickly as possible with a mandate to:

- Help facilitate a co-design process within each REZ to guide areas for development, protection and improvement
- Spread information in the community around the REZ and broader energy transition
- Work with existing networks to help people engage with the REZ framework and individual projects
- Identify opportunities or requirements for greater community co-investment in large-scale projects, such as the model set out in Helen Haines' 2021 Australian Local Power Agency Bill².
- Bring local knowledge into regional assessment of important habitats, land uses and cultural heritage sites to plan renewable energy around these
- Include social impacts, road and infrastructure upgrades in REZ management plans.
- Guide the spending of pooled community benefit funds for strategic local improvements
- Investigate ways to pool offset funds to improve local environmental outcomes

Underemphasis on customer energy resources

The large-scale renewable energy zone framework set out in the Bill is critical to Queensland achieving the renewable energy targets, and we appreciate that customer energy resources have been explicitly included in the calculation of progress towards the target.

² Australian Local Power Agency Bill (2021)

https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=r6673

However, we urge the Government to ensure that customer energy resources are supported and encouraged to the same degree as large-scale renewable energy, including energy efficiency, demand flexibility and electrification. These are key to achieving emissions reductions as quickly and cheaply as possible. They require significantly different community engagement and regulatory changes that must be prioritised to allow Queensland households and businesses to fully participate in the energy transition.

Government planning and intervention in customer energy resources must be focused on improving access to technology such as rooftop solar, batteries and energy efficiency. This has huge benefits for lower income and vulnerable households to reduce energy costs and improve quality of life. The Power Together alliance³ sets out 10 policies to reduce energy costs and emissions in Queensland through projects such as virtual power plants on social housing, improved access to solar for renters and minimum energy efficiency standards.

We look forward to working with the Government to deliver renewable energy at small and large scales to reduce Queensland's emissions, protect nature and deliver long term benefits for consumers and communities.

Please contact Clare Silcock [REDACTED] to discuss the contents of this submission further.

Queensland Conservation Council on behalf of



³ Power Together (2023) Policy Platform
https://powertogether.org.au/about-power-together/2023policy_asks/