

7 October 2025

New South Wales Environment Protection Authority

Submitted email: climatechange.review@epa.nsw.gov.au

Proposed Climate Change Licensee Requirements / Climate Change Mitigation and Adaptation Plans (Proposed Mitigation Requirements) – Consultation papers

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the New South Wales Environment Protection Authority's (EPA) proposed climate change licensee requirements and mitigation requirements. Origin recognises the important role the energy sector will play in the transition to a low-emission future, and the value of climate change mitigation and adaptation frameworks in supporting greater preparedness and resilience to climate-change risks. We are broadly supportive of the approach proposed but have provided comment on a number of key issues for consideration below.

The role of gas-fired generation in the energy transition

The EPA should adopt a flexible approach to reporting that acknowledges the critical role of gas power generation (GPG) in firming renewable energy and maintaining reliability until adequate storage solutions are deployed. There are likely to be limited opportunities for efficient new and / or existing GPG to reduce emissions beyond limiting output, which could inhibit the energy transition and compromise energy security, given the critical role of gas plant in firming renewables and maintaining reliability. We recommend that a whole of portfolio view be taken in the proposed Climate Change Mitigation and Adaptation Plans (CCMAP) to enable the most efficient delivery of emission reductions.

Utilisation of reports similar to CCMAPs

We support the proposal to allow facilities to use existing emission reports, where underpinned by robust methodologies, to meet their CCMAP reporting requirements, as this will assist with reducing duplication and administrative burden. Consistent with this, consideration should also be given to allowing exemptions from CCMAP reporting, such as where facilities are scheduled for retirement prior to 2030, noting the provision of a long-term adaptation plans from such facilities is not necessary to inform progress against NSW climate targets.

Mitigation measures

The consultation paper expresses a preference for entities to prioritise carbon offsets from NSW-based projects but notes that offset projects in other Australian locations can also be used. We support providing this flexibility, as offsets purchased from exchanges only provide 'generic' certificates (i.e. it is not possible to specify the attributes of an ACCU purchased from the ASX). The acceptance of all high-quality offsets would support the delivery of least cost solutions.

Emissions forecasting / reporting

To ensure consistency in reporting, standard methodologies and appropriate data sets for 10-year emissions outlooks will need to be developed in consultation with stakeholders and regularly reviewed, given the evolving nature of emissions pathways and carbon budgets. The development of 10-year forecasts is particularly difficult for GPG given its role in variable renewable energy (VRE) and the

associated level of uncertainty around its level of operation in the National Electricity Market (NEM). This uncertainty is heightened by significant regulatory uncertainty, noting the NEM Wholesale Market Settings Review is considering a mechanism to drive new investment in bulk energy, shaping and firming services that could further impact the utilisation of assets, thereby changing generation and emissions forecasts. We suggest that a shorter reporting outlook would provide a more credible view of emission trajectories for the EPA to assess whether NSW is on track to meet targets. The use of quality outlooks will minimise the possibility of premature intervention by the EPA, thereby ensuring efficient delivery of emissions mitigation and adaptation work.

Additionally, the EPA should adopt an approach consistent with NGERs, where only retrospective data is made publicly available. Detailed outlooks could reveal commercially sensitive information, potentially allowing for back casting of expected gas generation. The publication of aggregated / portfolio level retrospective data and reporting would allow for best-practice mitigation measures to be shared without compromising commercially interests.

If you wish to discuss any aspect of this submission further, please contact Liz Robertson at [REDACTED].

Yours Sincerely,

A handwritten signature in dark ink, reading "S Cole". The signature is written in a cursive, slightly stylized font.

Shaun Cole
Group Manager, Regulatory Policy