



September 26, 2024

Senator Karen Grogan  
Chair of the Senate Standing Committees on Environment and Communication  
PO Box 6100  
Senate  
Parliament House  
Canberra ACT 2600

Submitted via: [Senate Committee website](#)

Re: Submission to the Senate Environment and Communications Legislation Committee Inquiry into the **Future Made in Australia (Guarantee of Origin) Bill 2024 and related bills**

Dear Senator:

Thank you for the opportunity to provide a submission to the above Senate Inquiry.

Tilt Renewables is committed to continue playing a lead role in accelerating Australia's transition to clean energy. Tilt Renewables is one of the largest owners and operators of wind and solar generation in Australia with 1700 MW of renewable generation capacity across ten operating wind and solar farms as well as storage. In addition, Tilt Renewables has a development pipeline of over 5000 MW of wind, solar and storage projects.

## General Comments

Tilt Renewables strongly supports the introduction of Renewable Energy Guarantee of Origin (REGO) certificates to replace Large-scale Generation Certificates (LGCs) which will not be created after 2030. It is quite common for companies such as Tilt Renewables to enter into long term bundled contracts to sell electricity and LGCs together from one of our renewable generators to a customer. Such contracts often extend past 2030, so there is a need for REGOs which provide a mechanism for offtake parties to buy green energy certificates beyond 2030 to meet their sustainability and similar obligations. Tilt Renewables commends the Government for introducing this legislation into the Parliament.

## Specific Suggestions

### *Below Baseline Generation*

For the reasons cited in our previous submission<sup>1</sup>, Tilt Renewables considers that Below Baseline generation should not be included in the REGO scheme---particularly before 2031. However, we are reassured to some degree by the Government's current position, as explained by the Department recently, that Regulations will be introduced limiting the surrender of Below Baseline REGOs before 2031 to Emission Intensive Trade Exposed (EITE) companies or for the purpose

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<sup>1</sup> [20230207 Tilt Renewables REGO Submission.3a7745301841.pdf \(storage.googleapis.com\)](#)





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of producing products certified under the Guarantee of Origin scheme. However, introducing such important restrictions by regulations would enable a future Energy Minister to change or delete such provisions. Therefore, Tilt Renewables would respectfully suggest that these restrictions be incorporated into the legislation. As these restrictions will only be in effect for five years, there appears to be little rationale for enabling the flexibility to more easily change these important provisions by rules or regulation.

### *REGOs for Storage*

Generation REGO certificates have many attributes providing full transparency to customers regarding the origin of each REGO. This enables customers to purchase REGOs based on their preferred technology, time of generation and age of the power station amongst other characteristics. Likewise, customers wanting to purchase REGOs from battery systems, for example, should have access to information regarding the REGOs being surrendered to charge the battery system. For example, some customers may not want to buy REGOs from battery systems that are buying most of their REGOs from generation plants built decades ago.

We understand that there are provisions in the legislation for rules and regulations to be written enabling storage REGO customers to easily interrogate the REGO registry to ascertain the attributes of charging REGOs being surrendered by a particular storage project. Tilt Renewables respectfully requests that rules and regulations to this effect be written and implemented to provide Storage REGO customers with similar transparency to Generation REGO customers.

### **Conclusion**

Tilt Renewables strongly supports this legislation and commends it to the Parliament. While we have made a few suggestions, our primary concern is that the legislation is agreed and passed by the Parliament in the coming months.

If the Committee would like Tilt Renewables to appear at the Hearing to clarify the issues raised in this submission, or has any questions about this submission, please do not hesitate to contact the undersigned.

Yours Sincerely,

Jonathan Upson  
Head of Policy & Regulatory Affairs  
**Tilt Renewables**





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