15th August 2008

Committee Secretary
Senate Standing Committee on Environment, Communication and the Arts
Department of the Senate
P O Box 6100
Parliament House
CANBERRA ACT 2600

Dear Sir / Madam,

Thank you for the opportunity to provide a submission to the Senate Standing Committee on Environment, Communication and the Arts relating to the Renewable Energy (Electricity) Amendment (Feed-in-Tariff) Bill 2008.

The following three matters are provided for your consideration in your deliberations.

1. Achieving consistency in definitions. In past considerations on feed-in-tariffs terminology used has been confusing. The term ‘small scale renewable energy generation’ needs to be clearly defined when determining feed-in tariffs. It would appear that small scale generation has different definitions when referring to solar power compared to other forms of renewable energy as well as when ‘small scale’ is referred to in the regulatory system. It is our view that small scale generation should be at least up to 10kW, preferably defined as up to 100kW and that anything less than 3kW is referred to as micro generation.

2. Small scale wind energy needs to be incorporated in determining feed-in tariffs. Up to this stage, renewable energy from small scale wind generation appears not to have been seriously assessed and needs to be properly integrated into considerations.

3. A holistic approach needs to be adopted for establishing feed-in tariffs such as consistency across NEM jurisdictions including consideration of the introduction, retention or abolition of any rebates in establishing feed-in tariffs; engagement with other Federal Government Departments to establish tax incentives and to provide clarity on the application of the tax system on income realised from small scale renewable energy generation.
Should you require further clarification of the above, please do not hesitate to contact Jeff Bothe, Industry Development Officer, Business Development on (03) 5434 6197 or j.bothe@bendigo.vic.gov.au

Yours sincerely,

Stan Liacos  
Director - City Futures  
City of Greater Bendigo

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City Futures incorporates Business Development, Marketing, Media and Major Events, Tourism, The Capital - Bendigo's Performing Arts Centre, the Bendigo Exhibition Centre and the Bendigo Art Gallery