



5 June 2009

The Secretary
Senate Standing Committee on Economics
Parliament House
CANBERRA ACT 2600

E-Mail: economics.sen@aph.gov.au

Dear Sir

ORIGIN SUBMISSION: INQUIRY INTO THE CARBON POLLUTION REDUCTION SCHEME BILL 2009 AND RELATED BILLS

Origin Energy Limited (Origin) welcomes the opportunity to comment on the Carbon Pollution Reduction Scheme (CPRS) Bill 2009 and related bills.

Origin is Australasia's leading integrated energy company focused on gas and oil exploration and production, power generation and energy retailing. We are a major investor in electricity generation infrastructure, with around \$2bn of investments in gas-fired generation projects due to be completed through 2009 or 2010.

We have permits in place to make broadly the same level of investment in base load and/or peaking power capacity over the coming years should we decide to do so. New power stations operate for 30-50 years, so these decisions will have an impact for decades on the generating mix in the National Electricity Market and, in turn, on Australia's emissions profile.

Origin's overarching position on the CPRS

Although we do not have specific comment on the changes to the Bills since the exposure draft legislation, it is important that we take this opportunity to offer our overarching points of view on the CPRS:

1. Uncertainty over the form of carbon regulation and the timing of its introduction is leading to sub-optimal large-scale long-term investment decisions

Uncertainty in the regulatory environment is a real issue impacting investors and electricity customers today. It is distorting decisions that have a long term impact on customers and on new investment in the electricity industry.

(a) Increasingly difficult to get long-term electricity supply contracts

Participants in the National Electricity Market are assuming that a form of carbon regulation will be introduced that will affect prices for electricity. But they don't know when, in what form, or to what degree. In that context, they are unwilling to commit to long term electricity supply contracts that might quickly turn out to be well outside the market price.

This is not a theoretical or minor phenomenon. Over the last year, liquidity in the market for long term electricity supply contracts has deteriorated substantially. Large industrial and commercial customers and electricity retailers are increasingly struggling to find electricity suppliers who will commit to long term price arrangements. Instead they are buying shorter term contracts at higher and more volatile prices. The contract market is being affected on a day to day basis by rumours and by statements made by policy-makers about the CPRS.

This situation is to no-one's benefit. On average, in a more volatile market, prices for all consumers tend to be higher. Moreover, industrial and commercial customers unable to get long term contracts are less able to forecast their long term electricity costs, as are electricity retailers. And in the absence of clarity about long term revenues, electricity suppliers are less willing and less able to make investments in new capacity or maintenance.

(b) Uncertainty over fuel choice affects new investment decisions

With increasing overall demand for electricity in the National Electricity Market, and with a 3-5 year lead time for new plant to come online, the electricity market needs companies like Origin to keep investing in new electricity generation capacity.

When assessing potential new investments, a key question is which fuel to use. For baseload electricity generation, the choice in Australian conditions is coal or gas.

Investors like Origin observe that the economics of a new coal-fired station are under current conditions without a price on carbon generally very attractive when compared to a new gas-fired baseload plant. But when we look at the global trend, evident in Australia, towards pricing carbon, a new coal-fired station looks risky in the longer-term, because of its higher emissions. This makes it difficult to justify a decision to build new baseload plant, whether gas or coal.

These fundamental issues flow from the broad uncertainty now in the market as to when and in what form carbon pricing will be introduced in Australia. Our view is that the market requires a decision from Parliament as to the form and timing of a scheme as early as possible to address this uncertainty. On those two issues, our views are as follows.

2. Origin strongly supports a cap and trade scheme for carbon emissions as the central plank in Australia's climate change policy framework

We reiterate our continued support for a cap and trade scheme for carbon emissions. We believe it is the lowest cost, most flexible mechanism for addressing climate change on a large scale over a long timeframe.

We note that following significant debate over many years, both the current Government and its predecessor reached the conclusion that a cap and trade scheme was the best way forward.

A cap and trade scheme is also the best way to link Australia's efforts into a global approach to this global challenge.

Cap and trade schemes are already in place in the form of the European Union Emissions Trading Scheme and the Regional Greenhouse Gas Initiative (in the north-eastern US). Proposed schemes in California, Japan and New Zealand all take the form of cap and

trade scheme, and the American Clean Energy and Security Act of 2009 recently passed by the US House of Representatives Energy and Commerce Committee is a cap and trade scheme, as were the two previous Bills tabled in the House (the Warner-Liebermann and Lieberman-McCain Bills). When addressing a global problem, alignment of global action is a very important pragmatic consideration for Australia.

We also note that many of the major concerns being voiced by different groups in the current Australian debate relate not to the choice of a cap and trade scheme but, instead, to the degree of ambition of the scheme (i.e. how strong the targets are), its coverage (i.e., who pays) and its date of commencement. These fundamental issues would arise under any type of scheme. Any decision to adopt an alternative scheme would not remove the need eventually to make tough choices on these issues.

We also note that policy makers under the current and previous government have invested years of work in devising a detailed cap and trade scheme and accompanying measures. Whatever scheme is introduced - including a carbon tax - detailed and difficult issues such as these will need to be addressed.

3. Origin believes that a specific and certain start date for the scheme is essential and supports the July 2011 commencement date recently proposed by the Government

Origin supports the Government's intention to commence operation of its proposed CPRS in 2011 as we believe the current design has sufficient flexibility to adjust to the outcomes of international developments in the future.

The longer we wait to address climate change, the more it will cost in the long term and the less flexibility Australia will have to transition to a lower-emissions economy when we do decide to start.

Our primary concern, however, relates to certainty. We recommend that this 2011 start date be clearly and firmly locked in as soon as possible to create the certainty to allow necessary long term investment to proceed.

Conclusion

First and foremost, Origin supports a cap and trade scheme for carbon emissions as the central plank in Australia's climate change policy framework. We would like to see legislation passed to effect this cap and trade regime as soon as possible to address the continuing uncertainty for business, particularly in relation to long term capital intensive investment decisions.

Yours faithfully



Carl McCamish
Executive General Manager Policy and Sustainability
02 8345 5301 carl.mccamish@originenergy.com.au