

1 December 2024

Australian Sustainable Finance Institute (ASFI)

Lodged via [online survey](#)**Sustainable Finance Taxonomy: Second Consultation (October-December 2024)****ELECTRICITY GENERATION AND SUPPLY**

**Are the proposed Technical Screening Criteria (TSC) credible? In this context, credibility of criteria refers to whether a transparent scientific approach aligned to the Paris Agreement temperature goal was used, informed by the latest technological understanding.**

Yes - CEIG welcomes the additional detail provided on the criteria for eligible low-carbon gases, including the assessment of gas use under the taxonomy methodology. We appreciate the clarification that activities qualifying under the sustainable finance taxonomy are limited to those where gas is required for transitioning hard-to-abate industrial sectors.

**Are the proposed TSC usable? In this context, usability of criteria refers to whether they are comparable, clear, objective and easy to understand. If not, please explain how they could be improved.**

Yes.

**Does the firming advice adequately address the entity and system-level interactions related to firming activities in transition plans? Please provide any additional feedback on the advice, and where providing recommendations please include evidence.**

Yes- CEIG appreciates the further guidance that has been given to addressing firming and back-up generation activities in a credibly transitioning portfolio. We recommend several minor amendments:

Targets - While targets are covered comprehensively, including a requirement for interim milestones specific to firming capacity would provide clearer indicators of progress over the short and medium term.

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Accountability mechanism - Could delve deeper into how firming interacts with grid stability, renewable curtailment, and load management. This would enhance the assessment of firming's system-level value.

**Please provide any further feedback on specific activities here and provide evidence to support any recommendations.**

No comments.