



## **Bass Coast Climate Action Network**

**Submission to the Essential Services Commission**

### **Unaccounted for Gas Benchmarks Review 2022**

**Prepared for Bass Coast Climate Action Network (BCCAN)**

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We thank you for the opportunity to contribute to the interim review.

We object to the Essential Services Commission's (ESC) proposal to roll over the UAFG benchmarks for the next 5 year period. All of us, including the ESC and the gas distribution companies, should be doing our fair share to do what we can to lower greenhouse gas emissions and reduce the impacts of climate change. The ESC UAFG benchmarks should be tightened to drive lower methane leakage.

**Background.** Bass Coast Climate Action Network (BCCAN) is a local not-for-profit organisation of Bass Coast residents of diverse ages and backgrounds who are concerned about the climate emergency. We work to educate ourselves and members of our local community about its causes and the required responses, and actively encourage all three levels of government to adopt the policy changes that are now urgently needed to ensure a safe climate future.

BCCAN successfully lobbied via a petition of 1,100 signatures for the Bass Coast Shire Council to declare a Climate Emergency. There is now a Bass Coast Climate Action Plan.

**Timeframes.** We accept a six month roll-over of existing benchmarks to a financial year basis. That gives us more time to develop a better set of benchmarks for the next 5 years.

**Climate Context:** Methane is a nasty greenhouse gas. It lasts in the atmosphere for up to 12 years, and over a 20 year time frame has an impact about 83 times that of CO<sub>2</sub>. We don't have much time between now and 2050. Reducing methane leaks is a clear action to take.

We have seen the graphs of the breakdown of UAFG for the "Class B" pipelines which show that leaks of methane make up a large share of UAFG. We're upset that the ESC thinks that this level of leakage is acceptable. There is legislation already passed to cut Victorian emissions by 50% by 2030 and to achieve net zero by 2050. Why doesn't the ESC reflect that legislation in these UAFG benchmarks?

ESC suggesting a “business as usual” approach seems odd given the Victorian Government’s [Gas Substitution Roadmap](#). This is a good document, and its ideas are further developed in the [Community Gas Retirement Roadmap](#) by FoE.

**Targets:** The future UAFG targets need to trend down so that the distribution companies pay closer attention to reducing leaks. If leaks make up half of the UAFG, then reducing the targets over five years by about a quarter seems reasonable. So from say 4% to 3%.

**Reporting:** We are also aware that the gas distribution companies are reporting two different sets of numbers to the state and federal government about greenhouse gas emissions. Why is there no link between the fugitive emission part of UAFG and the national greenhouse gas emission reporting? The national reporting numbers are used to measure our progress against legislated targets, so surely this is important.

Thank you for listening.

Jessica Harrison and Aileen Vening

Co-convenors of Bass Coast Climate Action Network