QREC
Queensland Renewable Energy Council

Energy Roadmap Amendment Bill 2025

Submission to the Governance, Energy, and Finance Committee

3 November 2025

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1. Executive Summary

The Queensland Renewable Energy Council (QREC) acknowledges the opportunity to provide a submission on the *Energy Roadmap Amendment Bill 2025* (the Bill) as introduced into Queensland Parliament on 16 October 2025.

While the Bill sets an important direction for Queensland's future energy system, QREC is concerned by the repeal of legislated renewable energy targets and the limited consultation preceding its introduction sends a disjointed signal to investors. As demonstrated by the 13% Gas Scheme in 2005, clear targets are an effective and transparent way for Queenslanders to understand the staged transition toward a modern, lower emission energy system. Replacing the renewable energy targets with a general emissions objective also weakens policy accountability. QREC strongly supports retaining measurable targets aligned with Queensland's net-zero by 2050 commitment.

Government plays a critical role in communicating this shift, from supporting consumer resilience through rooftop solar and community batteries, to enabling large-scale renewable and gas developments that will replace ageing state-owned generation assets. QREC maintains that this requires clear and durable policy settings. It is the durability of energy policy that shakes investor confidence and for many developers and investors, 2025 has already been marked by rapid policy change with limited industry participation in the reform process. Now is the time to restore energy policy stability, so Queensland can deliver the significant new wind, solar and storage capacity required to meet the Government's objectives.

QREC welcomes aspects of the Bill and the Energy Roadmap released prior to the Bill on 10 October 2025, including the Energy System Outlook, CopperString delivery, and revised Regional Energy Hub, but notes key operational and governance gaps. Greater clarity is required on the Roadmap's other key initiatives i.e., how the Decision Matrix for state-owned coal assets will apply, and how the $400M Energy Investment Fund and Investor Gateway will be administered.

QREC supports maintaining public ownership of existing generation assets while leveraging private capital to deliver new investment. Public ownership should enable, not inhibit, the scale of private investment required.

The Bill provides a foundation for Queensland's next energy chapter, but greater legislative clarity, stable policy settings, and meaningful consultation are essential to restore investor confidence and secure Queensland's position as a clean energy leader.

1.1. Recommendations

To ensure successful implementation, QREC makes 12 recommendations. While not all pertain directly to the Bill, given the critical linkage with the Energy Roadmap and the lack of consultation on the same, QREC feels this is an important opportunity for the Governance, Energy and Finance Committee (GEFC) to examine those linkages to ensure their meaningful translation into the Bill.

The recommendations are outlined in the table below:

Recommendation 1 The Committee recommend the retention of Queensland's legislated renewable energy targets in the (to be renamed) *Energy (Infrastructure Facilitation) Act 2024*.	*Section 6.1*
Recommendation 2 The Committee recommend embedding climate change and decarbonisation as central considerations in the operating timeframes for state owned generation assets.	*Section 6.3*
Recommendation 3 The GEFC recommends the development of outward facing material on the operation of the new/revised Regional Energy Hubs so that the details of how they will attract investment and their operation are clear.	*Section 6.5*
Recommendation 4 The GEFC recommend the inclusion of an estimate of the operating life of each publicly owned coal-fired power station in each Energy System Outlook. QREC suggests this subsection be amended to so that the Minister ***must*** provide this estimate to adequately advise the market and communities of the anticipated operating life of publicly owned coal-fired power stations operating in Queensland. This can be readily achieved by amending new subsection 15(3)(a) to the '*The system outlook must also include— (a) an estimate of the operating life of each publicly owned coal-fired power station*'.	*Section 6.3*
Recommendation 5 In regards to recommendation 4 above, the Committee is asked to seek clarification on the Energy Roadmap's Decision Matrix for state-owned coal assets.	*Section 6.3*
Recommendation 6 Given the removal of both the Energy Industry Council and the Queensland Energy System Advisory Board, QREC asks that the GEFC recommend stakeholder consultation be undertaken on each Energy System Outlook as part of its development, particularly with industry (possibly through a standing advisory group established to advise and review).	*Section 6.7*

Recommendation 7 The GEFC recommend the maintenance of the role of the Queensland Renewable Energy Jobs Advocate which could be suitably reframed to cover the skills and workforce development needs associated with the energy sector generally, including the transition to renewables.	*Section 6.7*
Recommendation 8 The GEFC recommend an amendment to the ERA Bill to include a project call-in power under the *Planning Act 2016* (Planning Act) to the Energy Minister to be used where projects are deemed critical to the state's overall energy Roadmap, ensuring the government can meet its commitment to reliable and affordable energy.	*Section 5*
Recommendation 9 The Government amend the Energy Roadmap to include renewable energy targets so as to show a clear pathway to meeting the government's Net Zero greenhouse gas emissions targets by 2050. This would be consistent with the now government's parliamentary support for the *Clean Economy Jobs Act 2024* during its parliamentary debate.	*Section 4*
Recommendation 10 The GEFC request that Government immediately establishes an Energy Cabinet Committee or broaden the scope of the Resources Cabinet Committee to specifically include energy (noting the nexus between resources and energy, the removal of governance bodies in this legislation and the success of the Resources Cabinet Committee to focus on cross-cutting issues impacting on the mining industry).	*Section 5* *Section 6.7*
Recommendation 11 The GEFC recommend a government inquiry into Queensland's energy project assessments and approvals framework.	*Section 5*
Recommendation 12 The GEFC recommend a performance scorecard of government policies to proactively reduce the cost of living through electricity pricing, system reliability and emissions reduction should be introduced.	*Section 6.1*

2. About the Queensland Renewable Energy Council

QREC is the peak body representing Queensland's renewable energy sector. QREC advocates for responsible and sustainable development of renewable energy projects across the state, with a strong focus on collaboration and regional engagement.

QREC fosters strong relationships across key sectors – including agriculture, local government, communities, resources, and biodiversity conservation – and brings together a diverse network of Australian and international companies invested in Queensland's renewable energy future. With deep expertise in industry advocacy, policy development, and stakeholder engagement, QREC is committed to shaping a thriving and responsive energy sector.

Our members span the full spectrum of renewable energy technologies, including solar, wind, pumped hydro, battery storage and electricity transmission. QREC's leadership promotes leading practices that strengthen community partnerships and ensure meaningful regional involvement in the energy transition.

By championing innovation, transparency, and inclusive growth, QREC plays a vital role in supporting regional economies, driving investment, and securing Queensland's clean energy future—delivering sustainable, reliable, and affordable energy for all.

3. Introduction

QREC thanks the GEFC for the opportunity to provide a submission on the Bill. As the only dedicated Queensland peak body for the renewables industry, QREC works proactively with its members, governments and relevant stakeholders to ensure the industry's development framework is fit for purpose, and balances investment certainty with the expectations of the community.

Firstly, QREC wishes to express its concern regarding the extremely limited timeframe provided for submissions on the Bill, as well as the scheduling of the public hearing to occur the day before submissions are due. This compressed process limits the opportunity for meaningful consultation and risks diminishing the quality of feedback available to assist the Committee in its deliberations.

The Bill replaces the previous objective of achieving renewable energy targets with a broader aim of reducing greenhouse gas emissions from electricity generation, framed around balancing cost, reliability, and emissions outcomes. While QREC recognises that the Bill could have taken a less balanced approach, we do **not** support the repeal of Queensland's legislated renewable energy targets (50% by 2030, 70% by 2032, and 80% by 2035) under the *Energy (Renewable Transformation and Jobs) Act 2024*. In addition, neither the Bill and its Explanatory Notes, or the Energy Roadmap, refer to climate change. While QREC recognises the *Clean Economy Jobs Act 2024* does include references, a whole of government approach ensures policy clarity, specifically as it relates to the Energy Roadmap. Queensland heavy energy users are also seeking clarity on this correlation given their global decarbonisation ambitions, the Queensland Resources Council submission states –

> *"There is an expectation that Queensland will increasingly utilise energy generated from renewable sources as part of the net zero transition. However, the QRC notes that the changed trajectory for renewables could require further planning and changes to investment decisions. Some resources companies in Queensland have built renewable energy utilisation into their decarbonisation strategies, or through renewable energy power purchase agreements."*

This is what investors (energy and much broader) and customers expect, for the Queensland Government to continue to drive significant investment into clean energy and our regions, keeping our primary industries competitive.

While recognising the inclusion of emissions reduction within the proposed 'strategic infrastructure path objectives', removing any support of the renewable energy targets adds to the series of legislative and policy changes throughout 2025 that have unsettled investor confidence. Taken together, these ongoing shifts have had a cumulative and discouraging effect on renewable energy investment in Queensland, particularly for proponents seeking long-term clarity in project development and approval processes.

QREC tracks renewable energy investor sentiment throughout the year, with the last two QREC Executive Insight Survey[1] results highlighting many investors are now reviewing their future investment pipeline in Queensland due to a lack of policy certainty. Some quotes from industry investors and developers from the last survey in July 2025 note:

"Policy volatility and instability, is seriously increasing the sovereign risk of doing business in Queensland."

"The continued changes and uncertainty around energy policy and assessment procedures are the biggest concern for the renewable energy development industry currently."

"There are mixed messages coming from different parts of the government."

"Revoking permits adding significant planning approval requirements does not create confidence to spend money in the state."

To genuinely demonstrate that Queensland remains 'open for business' for renewables, greater consistency between stated policy goals and the legislative framework will be essential. That consistency must extend beyond the energy portfolio to a whole-of-government approach, ensuring that regulatory, planning, environmental, and infrastructure decisions made elsewhere in government align with the Energy Roadmap's intent. Without this coherence, Queensland risks undermining its own policy direction and deterring the investment required to deliver its stated energy transition.

In that context, QREC supports the Bill's recognition of the need to transition away from high emission electricity generation, reinforcing the *Energy Roadmap's* position of no new coal generation and giving investors a clearer picture of the State's energy trajectory. The GEFC is undoubtedly aware that renewable energy and storage are central to meeting Queensland's emissions objectives, supporting regional jobs, and maintaining a cost-conscious electricity system—ensuring Queensland homes and businesses have access to reliable, affordable, and sustainable electricity.

We recognise that the Bill provides for a whole of Government vision for a low cost and low emission energy future, but Queensland also needs a world-class development assessment framework to match. Industry needs timely and predictable pathways that set clear assessment timeframes and performance reporting, and this extends across all energy projects. Proposals to achieve this are set out in QREC's Renewables Growth & Investment Strategy (QRGIS) - see further detail below.

Given the name of the Bill, its close linkages with the Energy Roadmap, and the fact that there was no consultation afforded on the drafting of the Roadmap itself, QREC has taken the opportunity in this submission to provide some direct comments on the

[1] QREC Executive Insights Surveys 2025

Roadmap, particularly where it intersects with the Bill as well a summary of the related points from QIRGIS.

The rest of this submission is structured in the general order of the Bill, however, not all parts of the Bill are included given the short timeframes for feedback.

4. Energy Roadmap

The Queensland Government's Energy Roadmap released on 10 October projects up to 6.8GW of additional wind and solar operational by 2030, with a further 4.4GW by 2035. QREC's Renewables Growth & Investment Strategy (see further detail below) shows almost 8GW of committed generation and storage projects, valued at over $10.7 billion, with a broader pipeline, including very early projects, exceeding 140GW — the largest in Australia, indicating Queensland's strong investment potential.

At the time of the Energy Roadmap's release, QREC recognised that the Roadmap provided a level of certainty for renewables developers. However, this does not automatically or instantly equate to an immediate confidence boost for investors. Concern about the stabilisation of the whole Queensland policy framework for renewables given the number of other decisions and changes made during 2025, remains.

While the roadmap states coal-fired power stations will remain part of Queensland's energy mix for "decades" – at least up until 2046. Rather than fixed closure dates, the Roadmap introduces a new framework for decisions around operating timeframes for Government owned coal-generation assets.

The most significant in regard to the ERA Bill is the System Outlook, which according to Clause 68 "Section 2 (headed 'Investment Outlook')" of the Energy Roadmap is taken to be the first System Outlook and comprises the trilateral assessment of system need, economic viability, and asset integrity. During the Q&A segment of the launch of the Energy Roadmap, when asked if a government owned coal-generating facility would be closed where it was deemed an unsustainable asset, the Treasurer reiterated that any potential facility closures would be "*up to the experts using the decision matrix, with the foremost consideration coming down to system need*" [paraphrased].

As this strongly relates to Sections 7(a) and 7(c), and Clauses 13, 14, 53, 68 and 69 of the Bill, QREC seeks a greater understanding of how and when the matrix would be applied, and how the outcomes would be used and promulgated. This is further explained in the '*Replacement of Queensland SuperGrid blueprint*' section below.

QREC supports the government's emphasis on flexibility noting that this also comes through in the Bill, recognising that technical capacity may change over time, particularly as respective private (including partial) owners of Callide C, Millmerran and Gladstone coal-fired power stations publish operating timeframe decisions for their own assets. The Queensland Government will utilise the decision matrix for government

owned coal-fired assets to identify potential new investment from the early 2030's, where there is a system need for some or all these units to be extended (i.e., if not enough new generation has come online).

While the Roadmap recognises significant new contribution from gas with Queensland expected to host at least 6.1 GW of gas generation by 2035, and State-owned generators exploring options to deliver new gas-fired generation, QREC again strongly supports the Energy Roadmap's acknowledgement that if technologies like firmed renewables or demand response can effectively address supply gaps, the need for gas may be reduced.

Another core part of the Energy Roadmap is the introduction of the $400 million Queensland Energy Investment Fund, managed by Queensland Investment Corporation (QIC), with the fund designed to support renewable generation, firming, and transmission projects from origination to operation. This is further supported by the establishment of an Investor Gateway by the end of 2025 to coordinate engagement between developers, investors, and government-owned corporations. An investment 'front door' was proposed in QRGIS formally released in August 2025. To be part of the incentive for investment, clarity on how the Investor Gateway will be administered is required. Eg is it the intention that Government Owned Corporations will manage their own portfolios, i.e., Power Purchase Agreements and other financial instruments, or will this be incorporated into the scope of the Investor Gateway.

Similarly to the Decision Matrix for state-owned coal assets, QREC suggests that the GEFC seek clarification on how the government intends to operationalise the Fund and Gateway. As outlined in QREC's QRGIS, an Investor Prospectus could be a valuable first step to clearly communicate the 'open for business' approach for renewable energy and storage development investment.

QREC supports the Energy Roadmap's commitment to the delivery of the CopperString transmission project, connecting Townsville to Hughenden, and the modifications to its size which enables initial access for developers, allowing for future upgrades, and recognises the detail set out in the Bill on how this will initially be legislated. There remains critical questions on how developers will connect into CopperString.

As with CopperString, QREC sees that the Energy Roadmap's position to replace Renewable Energy Zones (REZs) with Regional Energy Hubs which focus on 'cost-efficient, shared transmission connections for new energy generation has been reflected in the Bill. We find it significant that the Energy Roadmap directly associates the Hubs with the Renewables part of the document, emphasising their connection with the former REZs. While QREC agrees with this recognition, again, the Bill does not provide the detail for what this directly means for renewables, such as growing supply demand, and what other synergies may be obtained from the hubs, especially given the clear restriction in the Bill to designated mapped areas.

As part of the examination of the Bill, QREC recommends that the Committee seek greater detail as to how the Hubs will function on the ground, as legislation does not

stand alone, but must be able to be turned into clear government processes and approaches. A Regional Energy Hub Investor Guide might be a valued addition.

Despite ongoing concerns with the government's positioning on fossil fuel generation, QREC acknowledges the *Queensland Energy Roadmap* as a necessary step in setting clearer direction for the energy transition. However, its effectiveness will ultimately depend on how well it is implemented — particularly whether it accelerates renewable energy deployment, strengthens the grid, and rebuilds investor confidence that has been eroded over the past year. The Bill's interrelationship with the Energy Roadmap will be critical, but its success will hinge on consistent follow-through rather than further policy uncertainty. QREC has set out a number of solutions to achieve this through the Queensland Renewables Growth & Investment Strategy as set in Section 5.

5. Queensland Renewables Growth & Investment Strategy

QREC's Queensland Renewables Growth and Investment Strategy (QRGIS) sets out key proposals to attract private capital, accelerate renewable deployment and position Queensland as a global energy leader.

Built on three core pillars — refocusing the energy system for long-term reliability and affordability, partnering with regional Queensland for a value-driven transition, and creating a world-class development framework — the Strategy prioritises grid-scale batteries, pumped hydro, streamlined approvals, and faster grid connections.

It places regional communities and First Nations participation at the centre of development, ensuring local benefits, stronger infrastructure, and inclusive growth. Through clear policy, stable regulation, and transparent planning, the Strategy aims to deliver affordable, reliable, and sustainable energy while driving investment and long-term prosperity for Queensland.

Delivering the energy projects to deliver the Energy Roadmap

The Treasurer and Minister for Energy, through their leadership of the Energy department, is well-placed to drive the coordinated, whole-of-government response needed to deliver Queensland's energy transformation at scale and speed. Several recommendations in the Strategy – such as operationalising the new Community Benefit System with the Planning department and decommissioning and financial security – require a strong interrelationship between departments. Cross-agency collaboration will be essential to align policies, streamline delivery, and ensure regional outcomes are inclusive, efficient, and fit-for-purpose.

Given the scale of energy investment outlined in the 2025–26 State Budget, energy policy and delivery should become a standing item for the Resources Cabinet Committee, or a standalone Energy Cabinet Committee should be established. With

new generation, major transmission, and firming projects underway, energy delivery is increasingly tied to land use planning, regional development, and resource sector strategy. Cabinet-level coordination is essential to meeting the Government's objectives for a sustainable, affordable and reliable energy system.

For example, project call-in powers under the *Planning Act 2016* (Planning Act) should be expanded to the Energy Minister and used where projects are deemed critical to the state's overall energy Roadmap. Without this extended power, there is a risk Queensland will not meet its future energy needs at an affordable price as ageing generation assets become unreliable and push up the cost of wholesale electricity prices.[2] This creates a nexus between decisions in other parts of government and the state's energy objectives.

Establishing a mechanism to enable the Energy Minister to 'step-in' where a development is relevant to the energy plan could be efficiently achieved by amending the definition of 'Minister' in the Planning Act to include the Minister for Energy. Currently it states: "Minister, for chapter 3, part 6, includes the Minister responsible for administering the SDPWO Act". Adding the role of the Energy Minister would be a minor amendment which could be readily achieved through this Bill and would enable the Energy Minister to access the call-in and pause provisions for energy projects they deem critical to meeting the State's ambitions under the Queensland Energy Roadmap – within the scope of the relevant administrative arrangements.

While not directly related to the scope of this Bill, considering the vital importance of complementary activities to ensure the roll out of Queensland's affordable, reliable and sustainable energy system, QREC seeks the Committee's support in recommending a government-led inquiry into Queensland's energy project assessments and approvals framework, seeking recommendations to achieve a streamlined and efficient assessment and approval process for all energy projects in Queensland. This is particularly timely given the federal Government's *Environment Protection and Biodiversity Conservation Act 1999* (cth) reforms and how they relate to more efficient federal-state environmental assessment processes including under an assessment bilateral agreement.

[2] The Queensland Audit Office Energy 2024 Report states in 2023-24 Queensland's wholesale electricity prices declined due to a number of factors:

- increased capacity and higher generation output from renewables
- the absence of one-off events that have occurred in previous years, such as extreme weather events and supply constraints from outages at the Callide and Swanbank plants, which led to significant price spikes last year
- a government-imposed price cap on coal which ended in June 2024 and the continued price cap on gas. the absence of one-off events that have occurred in previous years, such as extreme weather events and supply constraints from outages at the Callide and Swanbank plants, which led to significant price spikes last year

6. Energy Roadmap Amendment Bill

6.1. Optimal infrastructure pathway (Clause 8 and 9)

QREC acknowledges and supports the inclusion of Clause 8(c) – *"the reduction of greenhouse gas emissions from the generation of electricity in Queensland"* – within the 'Strategic Infrastructure Path Objectives' (formerly the 'Optimal infrastructure pathway' under the Energy and Jobs Act). This addition is an important recognition of the critical role renewable energy plays in achieving emissions reduction across Queensland's electricity generation system and consistent with the Energy Roadmap –

> *Across all pathways, changes in the operation of coal assets over time drive a reduction in Queensland electricity sector emissions, consistent with the Government's commitment to net zero by 2050. This includes a whole-of-economy approach to emissions reduction, leveraging opportunities for direct investment in lower emissions technologies and application of offsets where appropriate. Page 25*

However, QREC does **not** support Clause 9, which proposes to omit Queensland's legislated renewable energy targets i.e., 50% by 2030, 70% by 2032, 80% by 2035) under the *Energy (Renewable Transformation and Jobs) Act 2024*. These targets have played a key role in providing renewable energy investment certainty, supporting the business model for project financing, and signalling the State's mid-to-long-term policy commitment and facilitation role for a system transformation underpinned by renewable energy. While the inclusion of Clause 8(c) is a positive step, it does not fully replace the value of clear, legislated renewable energy targets in driving investor confidence and sector development. It also introduces the risk of misalignment and contradiction between Queensland's and the Commonwealth Government's regulatory settings.

Far from only driving a narrow focus on renewable energy production, targets facilitate increases in generation to place downward pressure on prices, transition of the national electricity market and decarbonisation of industry, which are national and global priorities. Absence of targets is out of step with other state, national and international policy frameworks. It indicates ambivalence to scaling up renewable generation and decarbonisation of industry in Queensland, which is competing with other states and countries to capture the investment being deployed to achieve this. As outlined in the submission on the Bill by the Queensland Council of Social Services (QCOSS):

"… without a renewable energy target it is unclear how the Queensland energy system will meet goals to reduce emissions and impacts on the environment."

Clause 8(c) nonetheless provides a necessary legislative anchor for continued decarbonisation of the generation mix which can practically only be achieved through greater integration of renewable energy sources – particularly onshore wind and solar

– which are now globally recognised as the lowest levelised cost of electricity (LCOE) generation technologies. According to the CSIRO GenCost 2024–25[3] report and the International Renewable Energy Agency's (IRENA) Renewable Power Generation Costs in 2024 report[4] , the cost of new onshore wind and solar PV developments in Australia is significantly lower than that of new fossil fuel generation, even before accounting for carbon pricing or emissions externalities. Further, the Centre for Applied Energy Economics & Policy Research's (CAEEPR) paper 'The Counterfactual Scenario: are renewables cheaper?' explores the notion that Australians were told renewables would be cheaper, yet electricity bills have risen sharply between 2021 – 2025. The results in this paper – published by esteemed academics and industry experts Paul Simshauser and Joel Gilmore – found future wholesale market costs and prices for renewables are lower compared with coal and gas.

> *"Even though the cost of wind has risen sharply in recent years, reversion to coal and gas – our counterfactual scenario – would result in wholesale market costs and prices ~30-50% higher."*[5]

By embedding emissions reduction as a statutory infrastructure objective, Clause 8(c) can help guide long-term planning and investment decisions toward these lowest-cost, zero-emissions technologies. In practice, this clause should ensure that energy generation infrastructure planning, energy generation and storage investment approvals, and network development processes are assessed through a decarbonisation lens – ensuring that future system buildouts deliver affordable, reliable, and sustainable electricity for Queenslanders.

Alongside the renewable energy targets was an annual review mechanism with the overarching intent to evaluate the targets against the purpose of the Act '.....to deliver in a safe, secure, reliable and affordable way.' This was an important feature to keep governments accountable for proactive policies across all portfolios to keep the lights on in the most affordable and sustainable way. While there is not necessarily the need to legislate a performance scorecard, government policies to proactively reduce the cost of living through electricity pricing, system reliability and emissions reduction should be tracked to reach a similar outcome.

6.2. Public ownership targets (Clause 10)

Queensland is a unique Australian energy jurisdiction, with government owned corporations playing a key role the energy market. This ownership means Queensland can employ deliberate policy sequencing in the transition to a clean energy system. Before the next Energy Roadmap timeframe, the energy market will need some distinct government ambition to deliver on its net zero by 2050. The correlation between clean and cheaper energy is well documented, with large Australian businesses now asserting

[3] GenCost 2024-25 Final Report
[4] IRENA Renewable Power Generation Costs in 2024 report
[5] Simshauser, P. and Gilmore, J. (2025) *The Counterfactual Scenario: are renewables cheaper?* CAEEPR Working Paper #2025-07, Centre for Applied Energy Economics & Policy Research, Griffith University. Brisbane.

bold Government action to ensure lower energy prices if they want to attract international investment. Mike Henry, CEO of BHP, stated at his AGM on 15 September 2025 the need to enhance productivity in Australia critically in the area of energy –

> *"Australia at the end of the day has to compete for global capital. In order to compete for that global capital, it has to be able to drive improved productivity through a variety of reforms.....We have to have stable, reliable and affordable energy on the path to net zero,"* Mr Henry said.

QREC's 2024 submission on the 54% government ownership target is unchanged that it may limit private investment and market competitiveness and supports the Bill's clarification of Queensland's public ownership provisions to retain 100% public ownership of its existing operational generation assets as at the time of the Bill's introduction. -

Continuing to attract private investment in renewable energy is a core pillar of QRGIS – and maintaining public ownership of key assets across transmission, distribution, generation and deep storage provides a stable backbone for private renewable energy investment and security of assets for future Queensland generations. Developers are more willing to commit capital when grid access, storage integration, and market operations are managed transparently and in the public interest.

With the electricity sector accounting for more than one-third of Queensland's emissions, retaining public ownership allows the State to lead by example in transitioning its generation fleet to lower-emission technologies. Publicly owned entities (Government Owned Corporations (GOCs)) such as CS Energy, Stanwell, CleanCo, and Powerlink can take a long-term, system-wide approach to emissions reduction, ensuring it's achieved in a way that protects energy affordability and reliability.

This is with the proviso that while, in principle, QREC generally supports the enshrining of 100% state owned generation for existing assets, it is important for the Committee to recognise in its report that if GOCs are only able to offtake energy, it will have an effect of somewhat (slowly) privatising the system. Making it clear that there is still the ability for GOCs to invest in clean energy assets and have a strategy regarding public ownership is critical. The on-going ability of GOCs to develop portfolios of assets and execute trading strategies can still be a positive contribution to enhancing overall system affordability.

QREC also notes the Bill's removal of the requirement for the Minister to prepare and publish a public ownership strategy report. Given the revised legislative target of 100% public ownership of existing assets, QREC supports this amendment in principle. The updated provisions already enshrine the objective in statutory manner, making the preparation of separate strategy documents redundant. The legislative clarity provided by the Bill provides transparency and accountability by clearly defining the extent of State ownership, rather than relying on periodic reporting.

6.3. Replacement of Queensland SuperGrid blueprint (Clause 68)

QREC appreciates the Bill's clarification that the Queensland SuperGrid Blueprint will be replaced by the Energy System Outlook. The transition provides long-awaited clarity for industry following the delayed review of the Blueprint.

However, QREC notes with concern that the first System Outlook is being legislated under Clause 68 (new s183 of the Bill) as section 2 of the Energy Roadmap – specifically, the 'Investor Outlook' section published in the Energy Roadmap on 10 October 2025. Embedding the Investor Outlook as the inaugural statutory Energy System Outlook, without sufficient technical and methodological detail, risks undermining the value of what should be a robust, evidence-based system planning instrument.

QREC acknowledges that the Investor Outlook in the Energy Roadmap states that the foremost consideration for the ongoing operation of State-owned coal-fired power stations is "system need." The inclusion of a Decision Matrix for State-owned coal assets – considering system need, economic viability, and asset integrity – is a pragmatic approach in principle. However, the current level of detail is inadequate to guide transparent and consistent decision-making across the sector.

To enable confidence and facilitate investment, QREC strongly recommends that the System Outlook include quantitative and transparent definitions of the factors that inform the Decision Matrix, including:

- System need: Greater clarity on how system need will be determined, including the quantitative boundary conditions, performance metrics, and weighting of cost competitiveness to be applied is essential. Clear definitions of fuel security and operational compliance should be provided, as well as criteria for assessing locational value – particularly in regional Queensland where renewable integration and network strength vary considerably.
- Economic viability: The System Outlook should detail how asset operating costs, wholesale market dynamics, and carbon intensity will be evaluated in determining the viability of continued state-owned coal-fired generation, and how these assessments will interact with private investment signals for renewable energy and storage.
- Asset integrity: Transparency around maintenance requirements, technical life, and regulatory compliance thresholds will be essential for providing industry with a clear understanding of potential retirement timelines for publicly owned coal assets.

Further, QREC seeks clarification on how the Minister will consider the Strategic Infrastructure Path Objectives – specifically, the reduction of greenhouse gas emissions from electricity generation (Clause 8(c)) – when determining outcomes under the

System Outlook. Without explicit reference to decarbonisation thresholds in the decision framework, there is a risk that system planning will focus narrowly on reliability or cost factors, at the expense of emissions outcomes.

QREC's supports the inclusion of new subsection 15(3) and (4) providing the Minister ***may*** include an estimate of the operating life of each publicly owned coal-fired power station in the Energy System Outlook. QREC suggests this subsection be amended to provide the Minister ***must*** provide this estimate to adequately advise the market and communities on the anticipated operating life of publicly owned coal-fired power stations operating in Queensland.

QREC notes the Investor Outlook's acknowledgment in the Energy Roadmap that "*if technologies like demand response or firmed renewables can effectively address supply gaps, the need for gas may be reduced*." This statement reinforces the importance of ongoing policy and investment to accelerate the deployment of firmed renewable energy generation and storage that can displace reliance on fossil fuels while maintaining system reliability. As outlined previously, energy policies and associated assessment and approvals should be geared towards bringing in significant firmed renewables to reduce supply gaps.

Under Clause 2.10.1 of the National Electricity Rules, generators are required to provide at least 42 months' advance notice of closure, unless granted an exemption by the Australian Energy Regulator. QREC recommends that the System Outlook provide clearer guidance on the conditions and timing under which closure notices for State-owned coal-fired assets may be issued. For instance:

- Will a closure notice require that sufficient new generation capacity is already operational to replace the retiring asset's output? or
- Will "system need" be assessed based on forecast demand and an approved pipeline of renewable projects under construction or nearing connection?

These clarifications are crucial, as the definition and timing of "system need" will directly influence the investment environment for renewable energy developers. Uncertainty in these parameters could delay private investment decisions, constrain capital deployment, and slow Queensland's progress toward its emissions reduction and electricity affordability goals.

Genuine industry consultation on the Energy System Outlook should be undertaken in its development, with an industry advisory group established to advise and review, noting the first review of the Outlook is due in May 2027. This is essential to ensure the Outlook meets industry expectations, evolving over time with critical information needed to make informed investment decisions. This Outlook is also critical for regional communities, to understand why a level of development is needed.

6.4. Priority Transmission Infrastructure (Clauses 20, 23, 29)

The Priority Transmission Infrastructure (PTI) amendments are supported, in particular two key amendments:

- Removal of the sunset clause of the PTI framework in 2035; and
- Shifting the declaration of a PTI into regulation, signalling the PTI framework as a significant long term transmission framework for Queensland.

Various new sections provide for clearer Ministerial directions for eligible, candidate and declaration of a PTI as well as further flexibility in seeking the advice of a suitably qualified person in the decision.

QREC also supports the amended section 26 outlining further detail on the direction for Powerlink to construct, including construction commencement and completion dates for PTI.

6.5. Introduction of Regional Energy Hubs and Renewable Energy Zone amendments (Clauses 30 – 57)

QREC acknowledges the Bill's intent of replacing the existing Renewable Energy Zone (REZ) framework with a similar yet updated framework for Regional Energy Hubs (Hubs), and supports the policy intent to streamline delivery, enhance flexibility, and reduce administrative burden for energy generation and transmission inside the hubs. The adaptation from REZs to the Hubs presents an opportunity to modernise the framework governing coordinated transmission development in Queensland, whilst maintaining alignment with the 'Strategic Infrastructure Path Objectives' (i.e., the long-term minimisation of the cost of electricity for Queensland consumers).

The Hub framework will continue to provide for the declaration and regulation of geographically defined areas where generation, storage, and transmission infrastructure can be developed in a coordinated manner.

QREC notes that under the revised provisions per Clauses 31 – 33 of the Bill, the Hubs will continue to include controlled assets, hub declarations, a transmission network, management plans, participants, and a designated transmission network service provider, and will remain subject to regulatory oversight and hub design processes. We note the introduction of the design body as a replacement for the REZ delivery body, which remains empowered to recommend the declaration of a hub – supported by a collaborative and evidence-based approach to infrastructure planning.

Importantly, the regional energy hub framework retains the key market-led principle underpinning the original REZ concept: facilitating the efficient and coordinated connection of new generation and storage through proactive transmission planning. The Bill's amendments streamline operational processes by removing unnecessary

prescription[6], clarifying the replacement process for management plans, and enhancing negotiated access standards to provide greater certainty for developers. QREC supports these refinements, which may assist in accelerating project delivery, reducing administrative delays, and improving the bankability of renewable energy projects within the Hubs.

The Bill also makes amendments under Clause 45 to provide a framework that will ensure transparent cost recovery by both the Australian Energy Market Operator (AEMO) and the relevant Transmission Network Service Provider (TNSP). QREC supports this transparency, which will provide greater confidence to investors and improve coordination between network planning, connection processes, and market operations within the Hubs.

QREC notes that the establishment of regional energy hubs strongly aligns with the recommendations outlined in QREC's QRGIS, specifically:

- Reaffirming the framework's focus on timely grid planning, connection cost reduction, investor certainty, and community confidence; and
- Publishing clear timeframes for the staged development of energy hubs to maintain Queensland's competitive advantage through accelerated delivery.

It is also positive to see the concept of REZ Readiness Assessments omitted from the Energy Act, which has become duplicative following the passage of the *Planning (Social Impact and Community Benefit) and Other Legislation Amendment Act 2025* (PSICBOLA Act). This amendment strongly aligns with QREC's position as outlined in QRGIS that the requirement for a project to undertake an SIA prior to lodging a development assessment would be redundant if that project was in a REZ where a Readiness Assessment had been completed.

From an industry perspective, QREC sees the Hubs model as an evolution of the REZ framework – one that can deliver tangible benefits to the renewable energy sector if implemented transparently and collaboratively. However, QREC notes that some potential challenges may arise under the new framework. These include the need for clear criteria and governance processes for declaring and modifying Hub boundaries, transparent prioritisation of projects within each Hub (i.e., incentives for energy generation development inside the Hubs compared to outside) and ensuring that market-led development does not inadvertently lead to over-concentration of transmission investment or underutilisation of regional network capacity.

Industry would expect to be adequately consulted on proposed locations, to ensure these are also informed by resource availability. Likewise for any associated fees and charges, to ensure these are fair and reasonable.

[6] Such as omitting the requirement under the former section 42(2) to consider certain matters when identifying entities and projects that can connect and access the hub transmission network as it has been superseded by other government policies to strengthen social licence requirements

While acknowledging such a recommendation is outside the scope of this Bill, QREC proposes that Regional Energy Hubs also have the capacity to operate as a cumulative management area for social and environmental assessment and benefit. QREC outlined this opportunity in its QRGIS and it also aligns with the Local Government of Queensland submission recommendation 4 –

> *"Recommendation 4: The LGAQ recommends the State Government considers how Regional Energy Hubs can be leveraged to improve coordination and planning across multiple energy projects, including infrastructure needs and cumulative impact management."*

6.6. CopperString (Part 8)

The Bill includes a new Part to establish a mechanism to facilitate the delivery of the CopperString Project, specifically the economic regulation of declared stages. These sections give effect to CopperString becoming a separate TNSP, enabling a separate Regulated Asset Base to that under Powerlink Queensland, Queensland's only TNSP currently. QREC supports this approach, providing for a clear separation of new transmission costs for a north Queensland regional economic development infrastructure development from the rest of Queensland household energy bills.

The government must prioritise significant new north Queensland industrial development at the same time as developing CopperString, ensuring matching supply and demand.

While not necessarily required for this Bill, there is significant detail required on the grid connection process for investor certainty. These matters and four recommendations are outlined cohesively in QREC member Windlab's submission – all wholly supported by QREC.

6.7. Removal of legislative frameworks (Clauses 58, 59, 60)

QREC acknowledges the Bill's intent to simplify the legislative landscape by repealing the Energy Industry Council (Council), the Queensland Energy System Advisory Board (Board), and the Queensland Renewable Energy Jobs Advocate (Advocate).

We note that these changes aim to reduce administrative complexity and unnecessary costs, while retaining the Government's ability to seek independent expert advice and consult with stakeholders as required. QREC is seeking a commitment from government for genuine consultation on the Energy System Outlook and energy policy generally. As mentioned previously, given the whole of government coordination needed on energy, an Energy Cabinet Committee should be established, or the Terms of Reference for the Resources Cabinet Committee be amended to include energy. QREC wholly supports the Western Downs Regional Council submission recommendation 3 relating to these issues –

> *"Considering that the energy portfolio is currently divided between departments based on the generation type, Council considers the Government to be at risk of working in 'silo's' and fragmentation of a coordinated plan to support energy investments. Particularly in the Western Downs, where coal, coal seam gas, hydrogen, solar, wind and BESS all play an important role in the energy sector, it is critical that the cumulative impacts of all types of generation are considered and collectively mitigated."*

QREC does **not** support the removal of the Advocate. This role provides a vital link between government, industry, workforce development, and regional communities during a time of impending structural change in Queensland's energy system.

The Advocate plays a meaningful and unique role in identifying and addressing key transition challenges and opportunities, including:

- Industry and supply chain development;
- First Nations engagement and participation;
- Just transition and economic diversification; and
- Workforce, skills, and capability.

QREC is concerned that repealing the role of the Advocate will create a significant coordination gap in the State's ability to plan and implement a just and equitable energy transition. Current legislative frameworks – particularly those relating to Social Impact Assessments and Community Benefit Agreements – lack the depth, clarity and consistency required to deliver meaningful First Nations employment, procurement, and engagement outcomes across Queensland's renewable energy projects.

The role of the Advocate can help address these gaps and support Queensland's commitments as a signatory to the First Nations Clean Energy Strategy 2024–2030. The loss of a dedicated role with a specific remit to advance social equity, workforce planning, and regional capability-building risks undermining the State's ability to meet those commitments in a coherent and measurable way.

QREC agrees with the First Nations Clean Energy Network submission which states –

> *"The Energy Roadmap Amendment Bill 2025 repeals this position entirely, with no clear replacement for this function. This represents a significant regression from the previous legislative commitment to increasing First Nations employment and participation in the energy industry. Without a dedicated position or body, the risk is that engagement becomes ad hoc, inconsistent, and dependent on departmental discretion rather than embedded practice."*

From an industry perspective, Queensland's energy transition depends on a skilled, adaptable, and regionally distributed workforce. However, major barriers persist, including:

- Shortages of Vocational Education and Training (VET) trainers and limited regional training capacity;
- Competition for labour with other sectors, particularly in regional and remote areas;
- Insufficient apprenticeship commencements and completions; and
- Difficulty attracting and retaining diverse talent pools, including women, First Nations peoples, and younger entrants.

Without the coordination, advocacy, and convening function of the Advocate, there is a real risk of fragmentation and duplication in workforce initiatives — resulting in inefficiencies, skill mismatches, and underutilisation of local talent. The Advocate serves as an important conduit between government, unions, industry, and education providers to ensure that the energy transition translated into tangible, regionally distributed employment outcomes.

This is particularly critical for communities hosting publicly owned coal-fired power stations that will inevitably reach the end of their operational life, as outlined in the Investor Outlook (the first System Outlook) under the Energy Roadmap. Without a coordinated, co-designed strategy that considers workers, employers, and the local economies dependent on these assets, Queensland risks an uneven transition that could erode public confidence and limit regional prosperity.

QREC therefore urges the Government to reconsider the repeal of the Advocate or, at a minimum, to establish a dedicated transitional coordination mechanism within the Treasury to continue the Advocate's key functions in workforce planning, First Nations engagement, and industry participation. If there is a concern that renewable energy is too narrow a focus, then the remit of the position could also be easily adapted to broadly advocate for the skills and employment requirements for the energy industry generally.

Regarding the Queensland Energy System Advisory Board, QREC recognises that its primary function – to prepare annual progress statements on renewable energy targets and advise the Minister on achieving those targets – is no longer applicable following the Bill's repeal of Queensland's legislated renewable energy targets. Accordingly, QREC acknowledges that the Board's function would be redundant under the amended framework.

QREC does not directly oppose the repeal of the Energy Industry Council, provided that adequate channels remain for structured stakeholder consultation. However, QREC encourages the Government to ensure that ongoing industry engagement mechanisms are maintained or strengthened through formal advisory or working group processes to preserve a collaborative approach to policy development and implementation under the Energy Roadmap. QREC wholly supports the Queensland Farmers Federation submission recommendation relating to this section –

"QFF urges that if these bodies are removed, the Government embeds statutory consultative and reporting obligations to retain the core functions (worker transition planning, regional engagement, and technical advisory functions) and continues to ensure input is actively sought from industry and community on key aspects critical to a successful energy system."

6.8. Transitional provisions (Division 2)

S182 First System Outlook

As per the above.

S185 Appointment as REZ Delivery Body

QREC supports the transition of Powerlink to be the hub design body under section 75 as in force on commencement.

Powerlink has the technical expertise, institutional knowledge, and existing operational frameworks required to efficiently coordinate the planning and delivery of hub infrastructure. Retaining Powerlink in this role will:

- Ensure continuity and consistency in transmission coordination and associated stakeholder engagement for the Hubs;
- Allow the Government to leverage established systems and regulatory processes;
- Maintain accountability and transparency in cost allocation and connection planning; and
- Avoid duplication of functions or fragmentation of responsibilities across multiple entities.

7. Follow up

If you have any questions about any of the points and recommendations raised in this submission, please contact Frances Hayter on 0417 782 884 or fhayter@qrec.org.au or Hannah Gardiner on hgardiner@qrec.org.au or 0430 441 115.

QREC collaborates with industry, communities, and all levels of government to drive the growth of Queensland's renewable energy sector.

As Queensland's only renewable peak industry body, we represent stakeholders across solar, wind, pumped hydro, electricity transmission and battery storage.

Our leadership in policy development promotes leading practices and fosters positive community relationships. Through this focus, we aim to power regional growth, support Queensland's economic future, and provide access to clean, reliable and affordable energy for all.

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