

We wish to register our concern with the NABERS proposal to allocate standard grid emission values to externally supplied co/trigeneration electricity products and thermal energy, pending the establishment of an industry/government accreditation standard.

In the first instance, our concern stems from the fact that allocation of grid emission factors to electricity imported to a building from a precinct energy hub, will be a major disincentive for any building owner to commit to being part of a precinct energy solution, since the electricity use will not reflect the carbon benefit of using a less carbon intense primary fuel, as opposed to grid electricity.

Secondly, there is no identification of “ownership” in establishing an industry/government accreditation standard for co/trigeneration emission values nor is there a time frame indicated as to when this might happen. Again this contributes to uncertainty for investors who need to make decisions on energy solutions for buildings which have long lead times.

The lack of a timeframe in establishing an accreditation standard for co/trigeneration emission values will also be a disincentive for any building owner to commit to being part of a precinct energy solution.

We consider that the creation of precinct energy solutions offers an interim measure for Australia as it transforms from the current high carbon content electricity grid, based on coal, to a low carbon future. Implementation of this part of the proposed NABERS Ruling has the potential to delay the introduction of precinct energy solutions and thus impede Australia’s progress to a low carbon future, in the short to medium term.

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