

Colonial First State Global Asset Management- Property believes more work is necessary to cover off the position concerning complex buildings, where co or tri generation is retrofitted or implemented post construction. I make reference in particular to a position where the use of a virtual power network is required in order to access all base building power on a single site in a commercially viable manner. Sometimes complex in-building or single-site electrical arrangements such as multi-feed or multi-meter connections make the use of a virtual power network the most viable way to distribute co generation power to base building (and if available to tenants). The current consultation paper should take into account a methodology to utilise this distribution method within a single site. Without this ability and in order to conform to "Issue2" the cost of unnecessary switchboard replacements and electrical works, makes any NABERS benefit out of reach. The NABERS administrators are fully aware of our position as represented through consultants on our behalf in regard to a multi-level office building in the Melbourne CBD (and we would be happy to work through these issues with you further).

We are also concerned that there is no direct action plan to resolve the issues identified in "Issue 4" regarding low/zero emissions in precincts, effectively leaving the industry in limbo. We are advised by technical experts that solutions are able to be reached, and encourage the NABERS Steering Committee to pursue these to resolution with industry engagement as soon as possible.

Regards,

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