

24 August 2012

NABERS Team
Office of Environment and Heritage
PO Box A290
SYDNEY SOUTH NSW 1232

Via email: nabers.energy@environment.gov.au

Dear Sir/Madam,

**RE: RULING REVIEW OF THE PROPORTIONING OF ENERGY USED BY
COGENERATION OR TRIGENERATION SYSTEMS**

Thank you for the opportunity to provide comment on the ruling review of the proportioning of energy used by cogeneration or trigeneration systems. The Green Building Council of Australia (GBCA) supports a review of the July ruling to consider how externally supplied thermal energy and electricity from cogeneration and trigeneration plants should be accounted for in NABERS Energy ratings for offices, shopping centres and hotels.

The GBCA operates Australia's only national, voluntary, holistic environmental rating tool for buildings. We work closely with the NABERS team to ensure that the Green Star rating system and the NABERS rating system complement one another and continually encourage the property and construction sector to improve industry standards.

The GBCA's mission is to develop a sustainable property industry for Australia and drive the adoption of green building practices. While Green Star is not a design tool, it does encourage the use of building practices and technologies that lead to better environmental outcomes and reduced environmental impacts. The GBCA welcomes the opportunity to collaborate with stakeholders such as the NABERS team on how to measure and achieve those outcomes.

The GBCA believes that the issues raised by government and industry stakeholders regarding the treatment of embedded energy generators by the NABERS rating system require careful consideration to understand the impact that any rules, or rule amendments, will have on stakeholders and on the built environment in general.

A number of GBCA members have also noted that the ruling will create a barrier to the uptake of embedded energy technologies that may conflict with the measure identified in the National Strategy on Energy Efficiency to maximise the potential for the application of cogeneration, trigeneration and other distributed energy technologies. The GBCA looks forward to working with the NSW Office of Environment and Heritage and the NABERS team on the issues identified by our members and other industry stakeholders.

We recognise that alternative energy options exist in a fast-evolving market and so we believe that this issue will need an approach that can evolve with the needs of industry, rather than finite and specific rules that will not anticipate innovation and changes to the market.

The position paper states that in regard to Issue 4 that *'NABERS supports the creation of an industry/government accreditation standard to account for the apportioning of generation and network supply emission values to thermal energy products and electricity. Once third party verifiable invoices/bills are available that clearly show the energy purchased and its emission value, this low emissions externally supplied energy can be included within a NABERS Energy rating.'*

We note that it will important for the NABERS National Administrator to provide an outline of the key principles for *'an industry/government accreditation standard to allocate an emissions value to co/trigeneration thermal energy and electricity products externally supplied to buildings (similar to GreenPower).'* A number of the GBCA's members have made contact with us to express their concern over the lack of guidance and significant barriers to clean energy generation systems in Australia's cities. The GBCA welcomes the opportunity to work collaboratively with the relevant government agencies to progress this.

In the absence of any government proposal to develop this industry accreditation standard, the GBCA would appreciate the opportunity to discuss the development of a standard to remove this barrier from such systems in Australia's cities.

The GBCA values the working relationship that we have built with the NSW Office of Environment and Heritage and the NABERS team over the past several years, especially around the rigorous and robust development of the NABERS and Green Star rating tools, and Green Star – Performance in particular. We look forward to continuing to work closely to ensure that the Green Star and NABERS rating systems continue to complement one another and encourage the best outcomes for the built environment.

We will be in contact with the NABERS team to discuss the points raised in this submission in more detail. In the meantime, please do not hesitate to contact us if there is any further information or clarification that we can provide.

Yours sincerely,



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