



Investa Properties Pty Ltd
ABN 54 084 407 241

Level 6, Deutsche Bank Place
126 Phillip Street
Sydney NSW 2000
GPO Box 4180
Sydney NSW 2001

DX97 Sydney

T 61 2 8226 9300
F 61 2 9844 9300
W www.investa.com.au

24th August 2012

Yma ten Hoedt
Principle Program Officer
Built Environment Section
Office of Environment and Heritage
59-61 Goulburne St
Sydney NSW 2000

Dear Yma,

RE: Review of the NABERS ruling 'Proportioning of Energy used by Cogeneration or Trigeration Systems'

We thank the Office of Environment and Heritage (OEH) and the NABERS Steering committee for the opportunity to comment on the review of the NABERS ruling 'Proportioning of Energy used by Cogeneration and Trigeration Systems' (the 'Review').

Investa supports OEH establishing clear guidelines around the treatment of externally supplied energy from trigeration plants within NABERS Energy. In general, we are supportive of the proposed rulings presented in the discussion paper, and provide specific feedback on the following components.

Creation of an accreditation standard for allocating emissions values to co/trigeration thermal and electricity products externally supplied to buildings

GreenPower products require accreditation primarily for supporting the reconciliation of the REC market. This accreditation also provides an important control for NABERS assessors as it provides certainty regarding the suitability of the GreenPower product used, particularly when the GreenPower is purchased separately to grid electricity.

Given that co/trigeration power is not considered within the REC market, nor considered in the National Greenhouse Accounts (NGA) Factors, we would consider an accreditation process to be onerous and have the potential to make the operation of these systems unviable.

The use of default grid emissions factors until such stage as a suitable accreditation process is determined

Where co/trigeration electricity is externally supplied to a building the existing NABERS rules provide very clear guidelines around the quality and sources of data to be used when



completing NABERS ratings. The existing rules define the allocation of emissions resulting from gas consumption, the use of supply authority metering and associated billing, verification of non-utility meters, and verification of reticulation networks to ensure all energy is accounted for. It is our opinion that NABERS Assessors are therefore appropriately supported by the existing NABERS rules to determine emissions factors for use within NABERS ratings and therefore an accreditation standard would deliver limited benefit.

Investa recommends that the NABERS National Administrator convene a technical working group to review the above issues. As the owner of Australia's first trigeneration precinct for commercial buildings, we would like to be included in that working group. Investa remains committed to working with the NABERS Administrator to resolve the issues outlined above in a manner that supports industry and the uptake of environmentally beneficial technologies.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Shaun Condon". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Shaun Condon
Head of Environment and Safety, Investa Property Group