



Friday, 24 August, 2012

NABERS Energy  
Built Environment Section  
Office of Environment and Heritage

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**Review of the NABERS ruling: 'Proportioning of Energy used by Cogeneration or Trigeneration Systems'**

The Property Council welcomes the opportunity to comment on the proposed revisions to the NABERS ruling 'Proportioning of Energy used by Cogeneration or Trigeneration Systems'.

The Property Council of Australia comprises the leading developers, financiers, owners and managers of investment property in Australia. Our members currently own more than \$670 billion of domestic assets.

In addition, our members include all the major construction, professional and trade services suppliers working within the property sector.

In principle, the Property Council and its members support the proposed changes to the ruling.

The ruling is central to ensuring NABERS tools accurately measure the environmental impact of buildings, and reward owners who opt for lower-emissions technology.

However, the proposal creates a high degree of uncertainty around the treatment of precinct generated energy in building ratings.

Members have raised concerns regarding:

- the lack of a clear timeline or process for developing the necessary protocols for recognising precinct generation in NABERS ratings – creating uncertainty for projects currently in development;
- the onerous nature of a possible accreditation process, especially where properly metered data is available from precinct generation systems;
- lack of default standards as an alternative to accreditation; and,
- the need for required metering standards and configurations to be clearly identified.

**The Property Council recommends the NABERS National Administrator immediately convene a technical working group**, including industry representatives, to address these concerns and develop a clear, logical approach to the use of precinct generation in NABERS ratings.

The Property Council is keen to work with the NABERS Administrator and National Steering Committee to resolve these issues and provide certainty for industry.

Please feel free to contact Jane Macnamara on 02 9033 1983 if you require any further information.

**Property Council of Australia  
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**The Voice of Leadership**

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