

COAG Energy Council
Department of the Environment and Energy
GPO Box 787
CANBERRA ACT 2601

By email: energycouncil@environment.gov.au

6 April 2018

Dear Sir/Madam,

RE: FACILITATING ACCESS TO CONSUMER ELECTRICITY DATA – CONSULTATION PAPER

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide feedback on the Facilitating Access to Consumer Energy Data Consultation Paper.

The GBCA, established in 2002, is an industry association committed to developing buildings, cities and communities that are productive, liveable, healthy, resilient and sustainable.

- **We rate** the sustainability of buildings and communities through Australia's only national, voluntary, holistic rating system – Green Star.
- **We educate** industry and government practitioners and decision-makers and promote green building programs, technologies, design practices and operations.
- **We advocate** for the sustainable transformation of the built environment.

The GBCA represents 600-plus individual companies with a collective annual turnover of more than \$40 billion. Our membership reflects the diversity of Australian business with over 500 small-to-medium enterprises through to 75 companies with annual turnover of more than \$100 million and 24 companies now listed in the ASX200, with a combined market capitalisation of more than \$620 billion. Members include major developers, professional services firms, banks, superannuation funds, product manufacturers, retailers and suppliers.

The GBCA supports COAG Energy Council's proposed consumer data access scheme, as this would enable building owners, managers and tenants to benchmark and identify strategies for better energy management. The Australian Sustainable Built Environment Council's 2016 report, *Low Carbon High Performance*, notes that energy use is highly variable across the building sector, efficiency projects are often technically complex, and the opportunities to improve building energy performance are fragmented across numerous small projects and decision makers. In order to achieve large scale improvements in the energy performance of buildings, this complexity must be reduced, so that consumers can understand the choices available to them, and outsourced to third party service providers. Facilitating streamlined access to energy consumption data is therefore important as it allows third parties, subject to privacy considerations, to package this data into information that leads to better sustainability and energy efficiency awareness.

As the consultation paper notes, the current process for accessing energy consumption data is not streamlined and varies depending on the geographic location and network service provider. The lack of uniformity means that the quality of data collected varies significantly in different jurisdictions and across

different building types. Not only does this act as a barrier to the development of energy efficient products, technologies and service offerings, it also increases the cost for consumers to undertake building energy ratings.

The GBCA has a long history of supporting local, state and federal government sustainability initiatives which involve measuring and managing energy usage and emissions, such as the National Australia Built Environment Rating System (NABERS), CitySwitch, the NSW Energy Savings Scheme, the Victorian Energy Upgrades Scheme and the Better Commercial Buildings Program. These programs reflect the considerable leadership and collaboration helping drive energy efficiency across the built environment. Leadership like that outlined in the City of Sydney's submission to this consultation is helping maximise the opportunities that exist to reduce our emissions. To that end we are pleased also to support the City of Sydney's submission to this consultation.

Ultimately, we believe that easier access to consumer electricity data would reduce the cost of participation in these programs, improve the quality and granularity of data collected and facilitate their expansion into new sectors of the built environment.

Please contact Sandra Qian, Senior Advisor – Policy and Government Relations on 0430 304 168 or at sandra.qian@gbca.org.au should you have any questions regarding this submission.

Yours Sincerely,



Jonathan Cartledge
Head of Public Affairs