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Stephen Procter, Strategic Delivery Manager, Sustainability Programs
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Dear Mr Procter,

The City of Sydney welcomes the opportunity to provide comment on the Energy Savings Scheme (ESS) 2018-19 Rule Change Consultation Paper.

The City of Sydney and NSW Government have a shared target for net zero emissions by 2050 across our respective jurisdictions. The City also has interim targets to reduce emissions by 70 per cent based on 2006 levels and for 50 per cent of electricity used in the local area to come from renewable sources by 2030.

Energy efficiency is key to meeting these targets and the City has long viewed the ESS as a world leading mechanism for supporting investment into energy efficiency.

Comments are only provided on two of the proposed changes.

2.3 Generating system limit adjustments

Question 6: Do you perceive any significant impacts, either positive or negative, associated with increasing the ESS cap on generating systems from 5MW to 30MW?

The City supports increasing the cap on generating systems from 5MW to 30MW to align with AEMOs nameplate rating cap. Uptake under the new threshold should be monitored to ensure that smaller systems are not crowded out by larger systems. Should this occur a quota mechanism or equivalent may be considered to ensure equity and expanded overall coverage (and energy savings) supported through the ESS.

4.1 Updates to NABERS baseline method

Question 14: Do you agree with the proposed changes to the NABERS baseline method? Please provide reasoning supporting your response.

The City strongly supports greater uptake of NABERS Energy ratings as a clear, robust and user friendly tool to measure the energy performance of buildings and drive energy efficiency.

The proposal to lower the required minimum rating improvement from 1 to 0.5 stars is therefore supported to encourage greater participation.

Goal 1 of the NABERS strategic plan is to develop a tool for every major building within 5-years. ESS updates therefore need to ensure updates remain current with available NABERS tools.

At present the ESS website states that NABERS ratings can be applied to office buildings, shopping centres, hotels and data centres.

With the recent advent of a NABERS Energy tool for apartment buildings, the current ESS update must ensure this significant yet often overlooked sector is eligible.

To place this into perspective, more than 80 per cent of all residents in the City of Sydney live in apartment buildings, and the energy load of common areas is typically half or more of the total energy consumed by apartment buildings.

The energy efficiency opportunities are significant, and there is a real opportunity to use the ESS mechanism to drive NABERS ratings for apartment buildings, leading to more cost effective upgrades by owners.

To enable this, the ESS needs to recognise Owners Corporations as a legal entity which can participate under the scheme.

We are happy to provide content on this specialist area. Please contact me on 02 9246 7761 or at mdewsnap@cityofsydney.nsw.gov.au to discuss further.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Melinda Dewsnap', with a stylized flourish at the end.

Melinda Dewsnap
A/Manager, Sustainability Programs