

From: [Peter Brigden](#)
To: [Phil Manners](#); [Hayden Fisher](#)
Subject: Feedback on potential changes to the CBD program.
Date: Tuesday, 29 October 2019 12:56:16 PM
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Hi there,

I would like to take this opportunity to provide feedback on proposed changes to BEECs issued for commercial offices.

I agree that some tenants, especially smaller ones or those in B and C grade office buildings are not generally savvy about how they could become more energy efficient if they upgraded their lighting and I also agree that many tenants are also of the opinion that “the owners own the lights, they should replace them”. I do feel however, that the way this review is looking to improve energy efficiency in this area is cumbersome and over complicated. I rate over 50 buildings a year, and about 15% are whole building ratings in NSW. Some of these buildings have over 30 tenants. Trying to get electricity bills from 30 tenants is like trying to heard cats!!!

I feel there is a far easier, less complicated way of letting all tenants know how much it is costing them per annum to NOT upgrade their lighting and therefore improve their energy efficiency. This way could be achieved by utilising data that is already contained in the TLA and be automatically generated, with no additional costs involved. It would also work in every state, regardless of who pays for the electricity.

- We know the NLA of every floor and/or tenancies within a floor
- We know the NLPD of every floor and/or tenancies within a floor
- We already rate the performance comparison against best practice
- NABERS ratings already show the buildings hours of operation. These are typically 3,000 hours per annum, or to be more accurate they could be entered by the assessor from the NABERS rating onto the BEEC application.

But there is nothing to link these numbers to costs. By adding an average electricity cost (based on postcode or state) you would end up with a very meaningful TLA. This average electricity cost would be based on peak/shoulder electricity costs + network charges – available from Bureau of Statistics or other sources.

An example is

NLA = 1,000m²

NLPD = 15.2 W/m²

Hours = 3,000

Sydney electricity cost 30c kWh

$1,000 \times 15.2 \times 3,000 = \text{Wh/pa} / 1,000 = 46,500 \text{ kWh pa} = \$15,200 \text{ pa}$

Best practice

NLPD = 5 W/m²

$1,000 \times 5 \times 3000 / 1000 = 15,000 \text{ kWh pa} = \$4,500 \text{ pa}$

Therefore this tenancy is costing itself \$10,500 pa against best practice.

This automatic calculation would show tenants very easily what the cost of not upgrading is.

I am happy to discuss this further.

Kindest regards,

Peter Brigden

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