

17 April 2019

Ms Michelle Crocker
NEPP Secretariat
Department of the Environment and Energy
John Gorton Building
King Edward Terrace
Parkes ACT 2600



Sent via email; NEPPSecretariat@environment.gov.au.

**GAS ENERGY AUSTRALIA RESPONSE TO QUESTIONS ABOUT THE NEPP AND
ESTABLISHED BUILDINGS**

Dear Ms Crocker

Please find attached Gas Energy Australia's response to the NEPP Secretariat's consultation questions regarding the National Energy Productivity Plan and established buildings.

If you have any questions regarding this submission please do not hesitate to contact Gas Energy Australia's Policy Research Officer Melissa Dimovski at 0436353877 or mdimovski@gasenergyaustralia.asn.au.

For your consideration

A handwritten signature in black ink, appearing to read "John Griffiths", is enclosed in a thin black rectangular border.

John Griffiths
Chief Executive Officer
Gas Energy Australia

Commercial Buildings - SRG Meeting Feedback March 2019	
1. Is there anything missing from the summary of policy options for improving existing commercial buildings?	<ul style="list-style-type: none">• Energy efficiency advantages of Liquefied Petroleum Gas (LPG), Liquefied Natural Gas (LNG) and Compressed Natural Gas (CNG) as low carbon fuels for space heating and water heating in commercial building applications• Consideration of the decarbonisation journey of gas• Ensuring policy options recognise the increasing use of renewable gas, including biomethane and biopropane, hydrogen and the ability of these renewable gases to utilise existing gas infrastructure• Targeting 'low hanging fruit' such as repairing existing building defects, servicing and maintaining existing hot water and climate control appliances and using water efficient tapware

<p>2. What policy options do you think present the greatest opportunities to improve the energy performance of existing commercial buildings, and what do you think the order of priority, or suite of options, should be?</p>	<ul style="list-style-type: none">• Opportunities to improve the energy efficiency of commercial buildings and reduce greenhouse gas (GHG) emissions that are technology neutral and do not impose costs on consumers that exceed the benefits• Improving access to low emission distributed energy through government support programs to reduce energy costs and emissions, particularly for regional and rural areas• As stated in the '<i>Cost-Effective Energy Performance Requirements for Non-Residential Buildings, 2022 – 2034</i>' report, there is the potential to reach net zero energy/emissions for the non-residential sector despite only modest reductions in the use of gas in buildings. Such policy options should remain fuel agnostic to ensure the most efficient and economical means of reaching net zero energy/emissions for existing commercial buildings are not overlooked• The discussion paper identifies building insulation (roof, wall and floor); windows/window treatments that reduce heat losses in winter and prevent heat gains in summer; and reducing draughts as the energy efficiency options having the highest benefit to cost ratios• Other energy efficiency options having high benefit to cost ratios include repairing existing building defects; servicing and maintaining existing hot water and climate control appliances; and using water efficient tapware
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<p>3. What are the key considerations that need to be taken into account with the policy options identified?</p>	<ul style="list-style-type: none"> • Technology neutrality in financial incentives and ‘green schemes’ • Achieving actual energy efficiency gains / improvements vs increased energy usage offset by renewables • Consideration of all forms of renewable technology, not just solar PV • Ensuring that renewable energy offsets are not limited to solar PV and ensuring that gas usage in a commercial building is able to be offset by renewable energy • New energy efficient building polices should deliver certainty and not duplicate existing national regulatory requirements and initiatives • Installation of PV panels should not be mandated – it should be voluntary and based on site-specific practicalities of installation and cost benefit analysis
<p>4. What research might assist in progressing this work?</p>	<ul style="list-style-type: none"> • LPG Supply and Demand Study 2017 - The Study covers LPG trade, sources of supply, including producers and marketers, and demand on a national and state by state basis. • International Energy Agency’s Country Report Australia, which demonstrates biogas usage across Australia.
<p>5. Would you be interested in attending a workshop in person at some point during June/July/August? If so, what jurisdiction/s would be your preferences?</p>	<ul style="list-style-type: none"> • Yes, Canberra
<p>6. Do you have any other comments or suggestions?</p>	<ul style="list-style-type: none"> • Gas Energy Australia (GEA) is the national peak body, which represents the bulk of the downstream alternative gaseous fuels industry, which covers Liquefied Petroleum Gas (LPG), Liquefied Natural Gas (LNG) and Compressed Natural Gas (CNG). The industry comprises major companies and small to medium businesses in the gaseous fuels supply chain including producers, refiners, distributors, transporters, retailers, vehicle manufacturers, equipment manufacturers and suppliers, installers, educators and consultants.
<p>List any research or data sources that is relevant to informing these questions or the project.</p> <ul style="list-style-type: none"> • GEA provided submissions into the DoEE’s National Energy Productivity Plan Trajectory for low energy existing buildings, these submissions addressed the concerns of GEA regarding technology neutrality, the decarbonisation journey of gas and the bias towards electrification. 	

Please return your responses to these questions by no later than **Wednesday 17 April 2019** to NEPPSecretariat@environment.gov.au.

Residential Buildings –SRG Meeting Feedback March 2019	
<p>7. Is there anything missing from the summary of policy options for improving existing homes?</p>	<ul style="list-style-type: none"> • Energy Efficiency advantages of Liquefied Petroleum Gas (LPG), Liquefied Natural Gas (LNG) and Compressed Natural Gas (CNG) as low carbon fuels for heating, cooking and water heating in residential building applications • Consideration of the decarbonisation journey of gas • Ensuring policy options recognise the increasing use of renewable gas, including biomethane and biopropane, hydrogen and the ability of these renewable gases to utilise existing gas infrastructure. • Repairing existing building defects, servicing and maintaining existing hot water and climate control appliances and using water efficient tapware
<p>8. What policy options do you think present the greatest opportunities to improve the energy performance of existing homes, and what do you think the order of priority, or suite of options, should be?</p>	<ul style="list-style-type: none"> • Opportunities to improve the energy efficiency of residential buildings and reduce greenhouse gas (GHG) emissions that are technology neutral and do not impose costs on households that exceed the benefits • Improving access to low emission distributed energy through government support programs to reduce energy costs and emissions, particularly for regional and rural areas • The discussion paper identifies building insulation (roof, wall and floor); windows/window treatments that reduce heat losses in winter and prevent heat gains in summer; and reducing draughts as the energy efficiency options having the highest benefit to cost ratios • Other energy efficiency options having high benefit to cost ratios include repairing existing building defects; servicing and maintaining existing hot water and climate control appliances; and using water efficient tapware
<p>9. What are the key considerations that need to be taken into account with the policy options identified?</p>	<ul style="list-style-type: none"> • Technology neutrality in financial incentives and ‘green schemes’ • Achieving actual energy efficiency gains / improvements vs increased energy usage offset by renewables • Consideration of all forms of renewable technology, not just solar PV. • Energy efficiency improvements in gas appliances • Ensuring that renewable energy offsets are not limited to solar PV and ensuring that gas usage in a residential building is able to be offset by renewable energy • New energy efficient building policies should deliver certainty and not duplicate existing national regulatory requirements and initiatives • Installation of PV panels should not be mandated – it should be voluntary and based on site-specific practicalities of installation and cost benefit analysis

<p>10. What research might assist in progressing this work?</p>	<ul style="list-style-type: none"> LPG Supply and Demand Study 2017 - The Study covers LPG trade, sources of supply, including producers and marketers, and demand on a national and state by state basis. International Energy Agency's Country Report Australia, which demonstrates biogas usage across Australia.
<p>11. Would you be interested in attending a workshop in person at some point during June/July/August? If so, what jurisdiction/s would be your preferences?</p>	<ul style="list-style-type: none"> Yes, Canberra
<p>12. Do you have any other comments or suggestions?</p>	<p>Gas Energy Australia is the national peak body, which represents the bulk of the downstream alternative gaseous fuels industry, which covers Liquefied Petroleum Gas (LPG), Liquefied Natural Gas (LNG) and Compressed Natural Gas (CNG). The industry comprises major companies and small to medium businesses in the gaseous fuels supply chain including producers, refiners, distributors, transporters, retailers, vehicle manufacturers, equipment manufacturers and suppliers, installers, educators and consultants.</p>
<p>List any research or data sources that is relevant to informing these questions or the project.</p> <ul style="list-style-type: none"> GEA provided submissions into the DoEE's National Energy Productivity Plan Trajectory for low energy existing buildings, these submissions addressed the concerns of GEA regarding technology neutrality, the decarbonisation journey of gas and the bias towards electrification. 	

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