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26 February 2009

Mr Jayan Parry  
Assistant Director  
Commercial Building Energy Efficiency  
DEWEHA

Dear Mr Parry

Re: Submission on the Mandatory Disclosure of Energy Efficiency for Commercial Office Buildings, Consultation Regulation Impact Statement. Released 18 December 2008

I recently attended the stakeholder information forum in Brisbane. In that forum, a number of points were raised during question time, the purpose of this short submission is to express our opinion on some of these issues.

Firstly, NettZero is an environmentally focused consultancy, our core service is the delivery of NABERS OFFICE Accredited Performance Ratings for Commercial Office Buildings and Tenancies. We are NABERS Ratings Specialists and I am an experienced NABERS Accredited Assessor having completed over 40 ratings in the last 6 months alone.

We have firsthand experience of the reluctance of many building owners to have their buildings rated. It is usually the owners with the worst performing buildings that are most reluctant to have their buildings rated. It is for this reason that we believe that the current voluntary system is ineffective in improving the energy efficiency of commercial buildings. Poor performing building can easily hide their inefficiency from the market place.

Our experiences indicates that many smaller buildings could cost effectively improve their energy efficiency through awareness, improved management procedures, education and training. In Brisbane, there are usually only about 20-30 buildings listed on the NABERS website as being accredited at any one time, a very small percentage of the market.

The main issue I wanted to address was regarding the costings used in your RIS for NABERS Ratings. During the Brisbane forum, there was doubt cast on the average price for a NABERS Rating used in your pricing models as being too low for the Brisbane market.

Our pricing in Brisbane for various NABERS Energy Ratings are 20% lower than the prices identified in table 4.2 of the RIS and used in your modelling. For subsequent ratings we provide a further 15% discount from our initial rating price. Our only condition on these prices is that the client has the necessary information readily available.

In the market place we tend to be on the lower end of the pricing range due to our structure and business model. Our business model is based on volume and subsequent ratings, as our volume grows and the number of repeat ratings increases, our pricing will decrease.

Therefore, we refute the point raised in the Brisbane seminar that the NABERS Rating prices used in your modelling are too low. The prices used are accurate even in Brisbane.

I hope this short submission is of assistance. If you or any of your team would like to discuss these points in more detail or if I can be of further assistance, please call me on 07 3123 4930.

Yours sincerely

A handwritten signature in black ink, appearing to read "m. Greening".

Matthew Greening  
Principal, NettZero Pty Ltd  
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