



Clean Energy Council submission to the Australian Building Codes Board's (ABCB) National Construction Code 2022: Consultation Regulation Impact Statement for a proposal to increase residential building energy efficiency requirements.

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback on the Australian Building Codes Board's (ABCB) National Construction Code 2022: Consultation Regulation Impact Statement for a proposal to increase residential building energy efficiency requirements.

The CEC is the peak body for the clean energy industry in Australia. We represent and work with Australia's leading renewable energy and energy storage businesses, as well as rooftop solar installers, to further the development of clean energy in Australia. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

The main objectives of the Regulation Impact Statement (RIS) could include reduction in electricity cost for consumers, reduced greenhouse gas emissions and keeping prices cost competitive. The CEC would like to provide some general comments on RIS rather than providing individual answers to the consultation questions. Our main suggestions include the following:

- Options other than option A and B should be considered (which will consider various percentages of the benchmark such as 50 and 90 percent of the option B)
- RIS should allow flexibility for any state and jurisdiction policies
- Three percent lowest discount rate is too low and at-least a five percent should be used in the cost benefit and sensitivity/breakeven analysis
- In Class 2 buildings, at-least 50 per cent of roof area must be left clear for the installation of solar photovoltaic panels

Further, future electrification of household appliances by green hydrogen (blending in green hydrogen in gas network) and EV charging could be considered in option A. We think that the societal cost minimising or benefit maximising option should be considered rather than the lowest cost alternatives. We support the perspective of the community as a whole to identify the proposal with the highest net benefit, but think it is not reasonable to assume that industry's response to the proposed changes will be to select the lowest cost alternatives (e.g., installing PV, adopting high efficiency appliances or a combination of approaches) in every case. We think the industry most likely respond to the proposed whole-of-house changes under proposed option A at-least, but with a possible lag. Amount of heat efficiency improvement, emission reduction and health improvements could be considered when considering benefits of various size windows, thermal fabrics, and thermal bridging in the RIS.

We would be happy to discuss these issues in further detail with representatives of ABCB. We look forward to contributing further to this important area for policy development.