



Clean Energy Council submission to the Australian Building Codes Board: National Construction Code 2022 Proposed Amendments to Energy Efficiency

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback to the Australian Building Codes Board (ABCB) on proposed amendments to energy efficiency provisions in the National Construction Code 2022 (NCC 2022).

The Clean Energy Council 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 CEC supports the overall direction of the proposed energy efficiency amendments.

We welcome the proposals to require electrical distribution boards and cable trays dedicated to electric vehicle (EV) charging, and a charging control system. We recommend a ratio of at least 40% of distribution boards to car parking spaces.

We support the proposals to require that the electrical switchboard of a building must contain at least two empty three-phase circuit breaker slots for a solar photovoltaic (PV) system and a battery system. We also recommend provision for four DIN rail spaces for the metering associated with the solar PV inverter.

We support the proposal that at least 20% of roof space be left clear for the installation of solar PV panels. For roof spaces smaller than 85 square meters, we recommend a minimum area of at least 17 square meters. For Class 2 buildings we recommend leaving clear 50% of the roof space, noting that exceptions apply.

We understand that consultation is being undertaken in two stages and we intend to provide more detailed feedback in response to the Consultation Regulatory Impact Statement (CRIS) for the energy efficiency provisions, which provides an economic analysis of proposed increases in the stringency of the energy efficiency requirements for residential buildings, including a full cost-benefit analysis. In this submission we outline our position, and we will follow up with more arguments in support of our position in our response to the CRIS.

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

The CEC supports the overall direction of the proposed energy efficiency amendments

The CEC supports the overall direction of the energy efficiency amendments proposed for NCC 2022. Specifically, we support the introduction of whole-of-home annual energy use requirements and the new provisions designed to allow easy retrofit of on-site renewables and EV charging equipment for Class 2 to 9 buildings.

Facilities for electric vehicle charging

The CEC welcomes the proposals to require electrical distribution boards and cable trays dedicated to EV charging, and a charging control system. We propose a ratio of at least 40% distribution boards to car parking spaces and will provide more detail in support of our position in our submission to the CRIS.

Facilities for solar photovoltaic and battery systems

The CEC supports the proposals to require that the electrical switchboard of a building must contain at least two empty three-phase circuit breaker slots labelled to indicate the use of each space for a solar PV system and a battery system. In addition, recommend that there should be provision for four DIN rail spaces for the metering associated with the solar PV inverter.

The NCC 2022 proposes at least 20% of roof space be left clear for the installation of solar PV panels. We propose that for Class 2 buildings the percentage of roof area should be set at 50%, noting that exceptions apply depending on the size of the roof, the other uses to which it is put and the extent to which it is shaded.

Where the total roof space is less than 85 square meters, we propose a minimum roof space of at least 17 square metres, which is the minimum area needed for a 5 kW system. A 5 kW system is quite modest by today's standards and the average system size is currently about 8.8 kW. An 8.8 kW system requires about 25 square meters.

To enable installation of a battery, we recommend at least one outside-facing wall must be left clear, with a minimum width of two meters, either against a wall of a non-habitable room or against a wall surface constructed of non-combustible material with no vents into the building within the two meter space. The 2 meter space must be capable of having a shade installed in case the battery must not receive direct sun.