

Ruling for Pilot Renewable Energy Generation and Purchasing

Version 1.0 – March 2022



NABERS is administered by the NSW Department of Planning, Industry and Environment.



Cover photo: Rooftop photovoltaic system in The Rocks, NSW

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March 2022

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Ruling for Pilot | Renewable Energy Generation and Purchasing | Version 1.0



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1 Introduction

1.1 Summary

This document is specifically for the pilot being conducted on the **Renewable Energy Indicator**. The Pilot will run from Friday 1 April 2022 until 31 May 2022. Once the pilot is completed, this document will be rescinded.

This document is a **Ruling** for the treatment of **Renewable Energy in NABERS Energy ratings** and for the **Renewable Energy Indicator**. It provides guidance to assessors where **Onsite Renewable Energy Generation (OREG) systems** are present and where the premises purchase renewable energy generated offsite. This ruling supersedes the ruling for OREG.

1.2 Scope

This **Ruling** is to be read in conjunction with the respective NABERS **Rules** as they apply to the building type.

Where a conflict between this **Ruling** and existing **Rules** is present, the requirements of this Ruling take precedence over the Rules.

This **Ruling** applies to any building type eligible for a NABERS rating using the NABERS Energy rating tool.

1.3 Alternative methodology

Assessors are to comply with the **Ruling** unless prior approval has been sought and approved by the **National Administrator**.

Where appropriate, **Assessors** may contact the **National Administrator** for use of this **Ruling's** methodology in alternative applications, such as, on-site recycled water and rainwater systems. Prior approval is required and may be granted conditionally, on a case-by-case basis and at the **National Administrator's** discretion.

1.4 How to use this document

Text appearing **dark green and bold** is a defined term. Defined terms can be found either in <u>Chapter 2</u> of this **Ruling** or in the terms and definitions chapter of the *NABERS The Rules – Metering and Consumption*.

The following formatting conventions might appear in this text:



Note: Text appearing with a grey background is explanatory text only and is not to be read as part of the **Ruling** or is otherwise not essential for the proper use of this document.



2 Terms and definitions

This chapter lists the key terms and their definitions that are integral to the proper use of this document.

Term	Definition	
assessor	An accredited person authorised by the National Administrator to conduct ratings.	
dedicated connection	An on-site renewable electricity generation system which is connected to a single end user (see Figure 3.2F).	
embedded network	A private electricity network that is connected to the parent electricity network or 'grid'.	
	Note: Most office buildings in Western Australia, South Australia and Queensland use embedded networks to supply tenants and the Base Building systems.	
end user	A purpose or activity that energy is used for.	
	End users may represent a different rated premises (e.g. tenancies and office Base Building, or multiple building types on a shared meter).	
NABERS rating input form	The rating input form provided by the Scheme Administrator for use by Assessors in the calculation of accredited ratings.	
On-site Renewable Electricity Generation (OREG) system	A system installed on the premises that generates renewable electricity .	
on-selling	The supply of renewable electricity to an end user outside the scope of the rated premises .	
	Note: For an office Base Building rating, an office tenancy or other end user located inside the building is considered to be outside the rated premises . The same principle applies for retail tenancies within a Shopping Centre, where the Shopping Centre is undertaking a NABERS rating.	
rated premises	The tenancy or building to be rated.	
renewable electricity	Electricity that is derived from sources that are regenerated, replenished or, for all practical purposes, cannot be depleted. For NABERS purposes, these sources are wind and solar.	
	Note: If the Assessor would like other sources to be considered under this Ruling they should contact the National Administrator.	



shared connection	An on-site renewable electricity generation system which is connected to multiple end users (see Figures 3.3.1a and 3.3.1b).
Large-scale Generation Certificate (LGC)	A certificate of renewable energy generated by a renewable energy generator registered with the Clean Energy Regulator.
Renewable Energy Indicator	The proportion of energy used in a rating that comes from renewable sources.



3 Treatment of renewable energy in NABERS Energy rating and the REI

3.1 General

NABERS Energy ratings are a measure of the energy efficiency of a building.

In NABERS Energy ratings, onsite renewable energy is considered an energy efficiency measure and contributes to the performance of the building. Offsite renewable energy purchases are not included in the rating and therefore have no impact on the performance of the building in the rating.

The **Renewable Energy Indicator** (REI) displays the proportion of energy used in a building that comes from renewable sources.

In the REI, both onsite renewable energy and offsite renewable energy purchases are considered renewable energy sources and will improve the REI result of the building.

3.2 Renewable energy for the REI

The **Renewable Energy Indicator** counts the following as renewable energy:

- a)Renewable electricity consumed onsite and where no LGCs have been created or they have been voluntarily surrendered.
- b)Renewable electricity generated onsite and exported, where no LGCs have been created. This electricity is deducted from the amount of electricity imported from the grid. An adjustment factor is applied to account for the transmission losses when exporting that electricity.
- c) Renewable electricity generated onsite and exported, where LGCs have been created and voluntarily surrendered. This electricity is deducted from the amount of electricity imported from the grid, without applying an adjustment factor as the transmission losses have already been accounted for in the LGCs.
- d)Renewable electricity from the Renewable Energy Target.
- e)Renewable electricity voluntarily surrendered by a State or Territory government on behalf of the premises in the State or Territory.
- f) Accredited GreenPower[™].
- g)Voluntarily surrendered LGCs from electricity generated from offsite generators.



Any renewable electricity purchased or generated where LGCs have been sold is considered grid electricity.



4 Accounting for On-site Renewable Electricity Generation (OREG) in NABERS energy ratings

4.1 General

This chapter of the rules refers to NABERS Energy ratings only. For the Renewable Energy Indicator, refer to Section 5.

Renewable electricity generated for use within a building may be either—

- a) directly connected to the rated premises (i.e. a dedicated connection); or
- b) connected to multiple end users through a shared connection, such as, in an embedded network. In this shared connection, the OREG system may be situated before or after the rated premises' meter.

For examples of **OREG system** arrangements, see Figures 3.2, 3.3.1a and 3.3.1b.

Renewable electricity which is exported from the **rated premises** directly into the grid cannot be deducted from the **rated premises**' electricity consumption data for NABERS Energy ratings.

Renewable electricity which is **on-sold** to other **end users** cannot be allocated to NABERS Energy ratings.

4.2 Dedicated connections

A dedicated connection refers to an OREG system connected to a single end user. The renewable electricity generated by the OREG system directly benefits this end user and the grid electricity supplied to the rated premises is reduced.

Rated premises which export **renewable electricity** to the grid must ensure the consumption data is clearly distinguishable between the grid energy imported and the **renewable electricity** exported. **Assessors** should contact the **National Administrator** if further guidance is required.

In an office Whole Building rating (i.e. the minimum energy coverage of both the office Base Building and all Tenancies), the **Assessor** may only apply the **dedicated connection** method.

Figure 3.2: Example of a dedicated connection arrangement





4.3 Shared connections

4.3.1 General

A shared connection is characterised by an OREG system feeding into a shared network, such as, an embedded network with multiple users downstream of the site's utility meter (see Figures <u>3.3.1a</u> and <u>3.3.1b</u>).

Where a shared connection is exporting to the grid, this exported amount cannot be deducted from the rated premises' electricity consumption data.

Figure 3.3.1a: Arrangement with OREG systems connected to the shared network



Figure 3.3.1b: Arrangement with an OREG system connected to the shared network

b) With a virtual meter

a) General





For a **shared connection**, the following priority listing for the allocation of **renewable electricity** must be followed:

- a) Allocation by claim.
- b) Allocation by proportional consumption.
- c) No allocation permitted.

These methods are outlined further in Sections 3.3.2 to 3.3.4.

All **end users** within the **embedded network** must be adequately metered in accordance with *NABERS The Rules – Metering and Consumption*. Adequate metering and consumption data must be available (including the **OREG system**) to conduct an allocation.

Note: Other evidence may be used to determine the amount of **renewable electricity** generated by the **OREG system** (e.g. solar inverter data in lieu of metering data). Please contact the **National Administrator** if further information is required.

4.3.2 Allocation of renewable electricity by claim

Ownership of the **OREG system** must be substantiated and any **on-selling** of the **renewable electricity** to other **end users** accounted for.

The maximum permissible allocation of **renewable electricity** to the **end user** can be no more than the **end user's** consumption amount.

Where the rated premises is seeking to allocate by claim, the following criteria apply:

- a) The rated premises is adequately metered for each end user in the embedded network, as per the requirements of NABERS The Rules – Metering and Consumption. This includes having adequate metering and consumption data available for the OREG system.
- b) All meters meet validation requirements as stipulated in the NABERS The Rules Metering and Consumption.



c) There are no gaps or missing consumption data in the metering systems directly concerning the **OREG system**, the grid input and the **end user** for whom the allocation is made.

When making an allocation by claim, the Assessor must obtain the following:

- a) Written evidence that demonstrates which party owns the OREG system.
- b) Written evidence demonstrating-
 - 1) any contractual arrangements or evidence of payment which specify any **renewable electricity** on-sold to other **embedded network** users; or
 - confirmation from the owner (or owner's representative) of the OREG system that there is no on-selling of renewable electricity to other users (a written statement on a company letterhead would suffice).

If the criteria in both (a) and (b) cannot be met, the **Assessor** must proceed to allocate the **renewable electricity** by proportional consumption.

Note: For entry into the NABERS Calculator, see Appendix B.

4.3.3 Allocation of renewable electricity by proportional consumption

Where ownership of the **OREG system** cannot be substantiated or the **on-selling** of **renewable electricity** to other users cannot be adequately accounted for, the **rated premises** must obtain the consumption data from all meters within the **embedded network** and proceed to the allocation by proportional consumption method.

When allocating renewable electricity by proportional consumption, Assessors must-

- a) obtain the total amount of annual renewable electricity generated on-site;
- b) exclude all renewable electricity which has been exported to the grid;
- c) determine respective electricity consumption of all **end users** in the **embedded network**; and
- d) allocate the **renewable electricity** generated to the **end users** by their respective proportion of the total electricity consumed at the premises.

If any of the steps in (a) to (d) above cannot be carried out, the **Assessor** must proceed without any allocation of **renewable electricity** to the **rated premises** (see Section <u>3.3.4</u>).

See Appendix A for an example of where the **Assessor** needs to calculate the proportional electricity consumption.

Note: For entry into the NABERS Calculator, see Appendix B.

4.3.4 No allocation permitted

Where proof of claim cannot be provided and consumption data from any sub-meter is missing, **renewable electricity** cannot be allocated to the **rated premises**. In this case, it is assumed that all electricity consumed is sourced from the grid.



4.4 Battery storage

4.4.1 General

Where the **Assessor** identifies battery storage as present on-site and suspects further assistance is required for entry into the **NABERS rating input form**, they may contact the **National Administrator** for further guidance.

4.4.2 Two-way charging

Where a battery is charged using electricity outside of the boundary of the premises (for example an electric vehicle charged at an employee's home) and electricity from that battery is consumed by the building, the electricity consumed must be metered, included in the energy coverage of the rating and considered grid electricity.

4.5 Documentation requirements

Assessors must collect and retain the following evidence to demonstrate they meet the criteria under Section <u>4.2</u>:

- a) Single line diagram or other evidence showing that the **OREG system** is directly connected to the **rated premises** and not shared with other **end users**.
- b) Documentation confirming any export of renewable electricity to the grid and that this exported amount has not been included in any allocation calculations set out in this Ruling.

Assessors must collect and retain the following evidence to demonstrate they meet the criteria under Section 4.3:

a) Contract or agreement confirming ownership of the **OREG system**. This may include leasing agreements.

Where such a document does not exist, the **Assessor** must provide written correspondence with the client/site confirming where ownership of the **OREG system** lies.

- b) Single line diagram or other evidence showing that the OREG system is directly connected to the same shared connection as the end user for which the renewable electricity is being allocated.
- c) Confirmation of any export of **renewable electricity** to the grid and that this exported amount has not been included in any allocation calculations set out in this **Ruling**.
- d) Contract or agreement confirming any on-selling arrangement(s) within the network. This may include Power Purchase Agreements (PPA) with end users within the network. Where such a document does not exist, the Assessor must either—
 - 1) provide evidence of payment. This can be in the form of invoices/bills where the amount of **renewable electricity** is clearly stipulated; or



- 2) provide evidence from the **OREG system** owner that they do not on-sell the electricity.
- e) All electricity proportioning calculations.

Assessors remain responsible for the accuracy of their ratings and must collect and retain all documentation as per the **Rules**.

If an **Assessor** is uncertain of the evidence type, they should contact NABERS for further information in advance.



5 Accounting for onsite renewable energy generation for the Renewable Energy Indicator

5.1 General

Renewable electricity allocated to the end user as described in Section 4 will count as renewable energy for the **Renewable Energy Indicator** (REI), if:

- a) The electricity has been generated by an OREG system of capacity less than or equal to 100 KW.
- b) The electricity has been generated by an OREG system of capacity superior to 100KW and either—

1) if **Large-scale Generation Certificates** (LGCs) have been created, these have been voluntarily surrendered against the rated premises; or

2) no LGCs have been created.

If LGCs have been created and sold, the renewable electricity will not count towards the **Renewable Energy Indicator**.

Where the OREG system is not metered in accordance with the Metering and Consumption Rules the renewable electricity generated will not count towards the **Renewable Energy Indicator**.

5.2 Exported renewable electricity

Electricity generated by an OREG system and exported to an end user outside the scope of the rated premises can be included as renewable electricity for the **Renewable Energy Indicator** calculation if either—

- a) the OREG system is less than or equal to 100 KW; or
- b) the OREG system is >100 KW and no LGCs have been created for the exported electricity; or



c) the OREG system is >100 KW and any LGCs created have been voluntarily surrendered against the rated premises.

Any electricity generated and exported for which the LGCs have been sold cannot count as renewable electricity for the purposes of the REI.

Exported electricity that meets the requirements to be considered renewable electricity is treated as a reduction in grid-based imported electricity in the REI as per section 3.2.

5.3 Documentation requirements

Assessors must collect and retain the following evidence for OREG systems superior to 100 KW if the electricity consumed and exported is counted as renewable electricity:

- a) If no LGCs have been created, written evidence from the end user that no LGCs have been created for the entirety of the electricity being claimed as renewable electricity for the purposes of the **Renewable Energy Indicator**.
- b) If LGCs have been created, documentation confirming that these have been voluntarily surrendered.

Assessors remain responsible for the accuracy of their ratings and must collect and retain all documentation as per the **Rules**.

If an **Assessor** is uncertain of the evidence type, they should contact NABERS for further information in advance.



6 Off-site renewable energy purchasing

6.1 General

Renewable energy purchases in the form of GreenPower[™] and Large-scale generation certificates (LGCs) count towards the Renewable Energy Indicator. They do not contribute to the NABERS Energy rating.

6.2 Accounting for GreenPower[™]

6.2.1 General

GreenPower[™] may be purchased at the time of consumption and included on the retailer's electricity bill, or retrospectively as a separate purchase from the energy consumed.

Note: The GreenPower[™] program aims to decrease greenhouse gas emissions associated with electricity generation and to facilitate the installation of new renewable energy generators across Australia. As such, the purchase of GreenPower[™] from energy providers accredited under the National GreenPower[™] Accreditation Program (known as a 'GreenPower[™] Accredited Generator'), is considered to be the purchase of a zero-greenhouse emission energy **source**. Visit www.greenpower.gov.au for further information.

6.2.2 GreenPower[™] included on the electricity bill

GreenPower[™] purchased at the time of consumption and included on the electricity should be entered into the NABERS Calculator as a percentage of the consumption as detailed in the electricity bill.

6.2.3 Separate purchases

Separate purchases of GreenPower[™] are those that are not included within the utility bill. The purchase of any GreenPower[™] bought separately must have occurred before the date the rating application was submitted. The Assessor must verify that the GreenPower[™] was used within the premises. For assessments where a separate GreenPower[™] purchase was made, the assessor must obtain written confirmation from the premises that the GreenPower[™] purchase was made.

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6.2.4 Bulk purchases

Where a bulk GreenPowerTM purchase must be divided between a number of properties, the **Assessor** must provide documentation from the premises to the **National Administrator** with a spreadsheet indicating the exact amount of GreenPowerTM (in kWh) allocated to each property for a specific period.

Energy to be included in the Renewable Energy Indicator under GreenPowerTM must be clearly GreenPowerTM Certified. As it is possible that a GreenPowerTM Accredited Generator may also sell non-GreenPowerTM Certified energy, **Assessors** must not assume that all the energy from a GreenPowerTM Accredited Generator is GreenPowerTM Certified.

Assessors must retain documentation that confirms all energy claimed as GreenPower[™] is GreenPower[™] Accredited. This can include invoices that clearly document GreenPower[™] Accredited energy or other documentation from the GreenPower[™] Provider confirming that any energy included under GreenPower[™] in the rating is retired through the GreenPower[™] program.

In all cases, the actual percentage or amount of GreenPower[™] energy supplied must be explicitly assessed from the bills or as advised in writing by the GreenPower[™] Provider. This information must also be replicated for each rating to allow for cross-checking. Proof of the GreenPower[™] purchase must be supplied with each rating application.

Note: GreenPower Corporate Direct is a product that allows large energy users to directly surrender their LGCs through GreenPower[™]. Buildings using this product will obtain a letter from GreenPower[™] to confirm the voluntary surrender of the LGCs.

6.3 Accounting for large-scale generation certificates

Large-scale generation certificates (LGCs) can be included in the Renewable Energy Indicator and count as renewable electricity if they meet the following criteria:

- a) The LGCs have been voluntarily surrendered.
- b) The LGCs are created less than 36 months prior to the end of the rating period.
- c) The purchase and surrender of the LGCs occurred before the date the rating was lodged.

Evidence of LGC purchase and surrender is an invoice or statement from a supplier on corporate letterhead identifying the following:

- a) Date of purchase.
- b) Volume of LGC's purchased (1 LGC = 1 MWh =1,000 kWh).
- c) Confirmation of voluntary surrender.
- d) Date of LGC creation.
- e) LGC certificate numbers.

Evidence of the allocation to the rated premises for a particular rating period is required from the rated premises.



Note: NABERS recommends that best practice methods are used when surrendering LGCs to ensure that their allocation is transparent and traceable:

The surrender of LGCs for each rating (i.e. for one building over a specific rating period) are separated out into separate surrender transactions within the REC Registry.

The address of the premises, scope of the rating (base building, whole building or tenancy) and rating period are entered into the 'surrender note' field in the REC registry. The naming convention to be used is: "ADDRESS/SCOPE/RATING PERIOD", for example "100 Smith Street Sydney/Base Building/01-01-2023 to 31-12-2023"

A screenshot of the LGC surrender including the surrender note field is obtained by the assessor.

Renewable Energy Certificates under the 'environmental charges' section of an electricity bill should not be added by the assessor as a voluntary surrender by the premises, as these are surrendered by the utility as part of their regulatory obligations. The **Renewable Energy Indicator** calculation includes the Large-scale Renewable Energy Target (LRET) renewable percentage automatically.

Interim Ruling | Renewable Energy Generation and Purchasing | Version 1.0 Appendix A – Calculating the proportional electricity consumption



Appendix A – Calculating the proportional electricity consumption

Example: A fully metered building is presented with the following:

- a) The electricity imported from the grid is 1,500 kWh.
- b) The metered electricity generated from the **OREG system** is 500 kWh.
- c) No renewable electricity is being exported to the grid and, as such, no deductions need to be made to the renewable electricity being allocated.

To determine the proportional allocation of **renewable electricity** to the Base Building, the **Assessor** must determine the consumption for each **end user**.

For end user, the metered electricity consumption is as follows:

End user	Electricity consumption (kWh)
Base Building (BB)	1,200
Tenant 1 (T1)	350
Tenant 2 (T2)	250
Tenant 3 (T3)	200

Determine all end users' respective proportions of electricity consumption:

Formula A

$$BB_{Proportion} = \frac{BB_{electricity\ consumption}}{Sum_{electricity\ consumption}\ (BB + T1 + T2 + T3)}$$
$$BB_{Proportion} = \frac{1,200}{(1,200 + 350 + 250 + 200)}$$
$$\therefore BB_{Proportion} = 60\ \%$$

Therefore, 60 % (or 300 kWh) of the **renewable electricity** may be allocated to the Base Building. The respective tenancies would be allocated accordingly:

End user	Proportion (%)	Renewable electricity allocation (kWh)
Base Building (BB)	60	300
Tenant 1 (T1)	17.5	87.5
Tenant 2 (T2)	12.5	62.5
Tenant 3 (T3)	10	50



Therefore, the respective net grid electricity consumption would be calculated as follows:

End user	Electricity consumption – renewable electricity allocation (kWh)	Net grid electricity consumption (kWh)
Base Building (BB)	1,200 – 300	900
Tenant 1 (T1)	350 – 87.5	262.5
Tenant 2 (T2)	250 – 62.5	187.5
Tenant 3 (T3)	200 – 50	150



Appendix B – Input into the NABERS Calculator

B.1 General

This Appendix provides guidance around input of the **OREG system** and allocated **renewable** electricity to end users in a shared connection (see Section <u>3.3</u>).

Dedicated connections (as per <u>Section</u> 3.2) are not expected to follow the processes outlined below due to their simpler wiring and consumption arrangements (see Figure 3.2). Should **Assessors** observe the need to enter the **OREG system** into the NABERS Calculator, a **dedicated connection** should follow the steps outlined in Section <u>B.2</u>.

Note: For further guidance or assistance, Assessors should contact the National Administrator at nabers@environment.nsw.gov.au.

B.2 Entry into NABERS Rate — Full claim

When entering the allocation as 'full claim' into the NABERS Calculator, Assessors must-

- a) enter the allocated amount as a 'non-utility meter exclusion' line item; and
- b) clearly identify the OREG system under the coverage description box (see Figure <u>B.2a</u>).

Figure B.2a: Screenshot of non-utility meter exclusion input

Non-utility met	Non-utility meter exclusions	
Non-utility meter identifier	Description of meter coverage	
000 000	OREG Allocation (Full claim)	

The allocated amount entered is the total renewable electricity generated by the **OREG** system, less the exported and on-sold amount(s).

Under the 'Energy Summary' tab, **Assessors** must answer 'yes' to the question regarding onsite generation providing the **rated premises** with power (see Figure <u>B.2b</u>):



Figure B.2b: Screenshot of Energy Summary question regarding on-site generation

Questions - Please note these questions will be reviewed in detail by an auditor to ensure comp	liance with the Rules.	
If there is any on-site generation providing Rated Premises with power, have you made sure that: - the fuels used to generate such electricity are included in the rating, if applicable; and - any exported electricity to the grid or any other user outside the Rated Premises is not accounted in the rating in agreement with section 6.3 of the Rules and/or the Interim methodology for co/trigeneration systems?	Yes v	0

B.3 Entry into NABERS Rate — Proportional consumption

When entering the allocation as 'proportional consumption' into the NABERS Calculator, **Assessors** must—

- a) enter the allocated amount as a 'non-utility meter exclusion' line item; and
- b) clearly identify the OREG system under the coverage description box, as well as the percentage factor associated with the allocated amount (see Figure <u>B.3a</u>).

Figure B.3a: Screenshot of non-utility meter exclusion input and percentage factor

Non-utility meter exclusions			
	Non-utility meter identifier	Description of meter coverage	
	000 000	OREG Allocation (25%)	

The allocated amount entered is the total **renewable electricity** generated by the **OREG system**, less the exported and on-sold amount(s), and multiplied by the percentage factor as provided in the coverage description box.

Under the 'Energy Summary' tab, **Assessors** must answer 'yes' to the question regarding onsite generation providing the **rated premises** with power (see Figure <u>B.3b</u>):

Figure B.3b: Screenshot of Energy Summary question regarding on-site generation

Questions - Please note these questions will be reviewed in detail by an auditor to	ensure compliance with the Rules.
If there is any on-site generation providing Rated Premises with power, have sure that:	you made Yes 🗸 🚺
 the fuels used to generate such electricity are included in the rating, if appli any exported electricity to the grid or any other user outside the Rated Prer 	icable; and mises is
not accounted in the rating in agreement with section 6.3 of the Rules and/or Interim methodology for co/trigeneration systems?	r the



Contact us

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