

Mr Roger Coogan  
Manager, Industrial Energy Policy Section  
Department of Resources, Energy and Tourism  
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Dear Mr Coogan

The Department of Resources, Energy and Tourism (DRET) has sought comment on the Energy Efficiency Data Framework Interim Report. This submission sets out the Energy Efficiency Council's early response to this report.

The Energy Efficiency Council brings together Australia's expertise in energy efficiency to support the development of policy and programs. Incorporating expert advice into the design of energy efficiency programs significantly improves their effectiveness and reduces program risk.

While the Council welcomes the opportunity to provide input on government programs, we note that several departments are currently consulting on a range of policies and programs, significantly straining the industry's ability to provide detailed, well-thought through comment on policies and programs. The Council strongly urges Australian Government departments to focus and coordinate their consultation processes.

The Council strongly supports the development of an Energy Efficiency Data Framework (EEDaF). Energy efficiency can deliver significant benefits to the Australian economy, protect businesses and households from rising energy prices and substantially cut greenhouse gas emissions. Well-designed energy efficiency programs have already delivered significant benefits to Australia, and *Australia's Emission Projections 2010* indicate that existing energy efficiency programs will deliver 39 per cent of Australia's abatement in 2020.

However, designing effective energy efficiency programs requires data, diligence and resources. There are currently substantial gaps in the data that would assist with program design and evaluation. Therefore, the Council recommends significant investment in developing a data framework will be critical to develop and evaluate energy efficiency policies and programs. This investment will pay itself back through the benefit of effective energy efficiency programs.

The Council commends the overall direction of the EEDaF, and recommends that the Australian Government focus in the short-term on collating and analysing data that is already collected by a variety of agencies from a number of sources. The Energy Efficiency Council should be noted as a potential Data Owner and Manager for the EEDaF (Interim Report, page 17), as the Council is currently gathering data on the size of certain energy efficiency markets.

In the long term the Government may need to gather additional data from Data Originators. The Government needs to approach this issue with sensitivity to the needs of industry. Many companies have invested resources in NGERS and Energy Efficiency Opportunities reporting in the last two years, and are currently concerned about additional reporting requirements. The resources required for NGERS and EEO reporting will decrease over time as reporting becomes business-as-usual.

The cost of gathering and analysing data means that EEDaF needs to focus on those areas of data that deliver the most value for policy making and evaluation. Prior to gathering data, it is important to determine which research objectives the data is intended to answer. One area of significant value is the potential for energy efficiency improvement

in different processes and sectors of the economy, the current efficiency of those sectors and their improvement over time.

In developing the Pilot Residential Energy Monitoring Program (REMP) and examinations in the commercial building sector the Government should canvass a range of issues, including types of hot water services, how they are installed (centralised versus point of use systems), appliance efficiencies and optimisation.

Please contact me on 03 8327 8422 should you require further information on any of the issues raised in this submission.

Yours sincerely



Rob Murray-Leach,  
Chief Executive Officer