

Penelope Sirault  
General Manager, Residential Energy Efficiency Branch  
Department of Industry, Science, Energy and Resources  
Email: [admin@nathers.gov.au](mailto:admin@nathers.gov.au)



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**Re: Proposed changes to the Nationwide House Energy Rating Scheme  
Discussion Paper, November 2021**

Dear Penny

Thank you for the opportunity to comment on the Discussion Paper on the Proposed changes to the Nationwide House Energy Rating Scheme (NatHERS).

The Energy Efficiency Council (EEC) strongly supports the NatHERS program. NatHERS plays a key role in the construction of more efficient and thermally comfortable homes.

- The EEC strongly supports expanding NatHERS to Whole-Of-Home ratings, noting that this expansion need to be done carefully, including:
  - o Maintaining the focus of star ratings on passive thermal comfort, as this provides critical information on energy efficiency, thermal comfort and safety. There should be limited trading off between onsite generation and thermal performance; and
  - o Ensuring that the Whole-of-Home rating considers the time of both energy use and generation. Energy use during certain periods (e.g. evening energy use during either winter or heatwaves) will strongly influence both energy bills, greenhouse gas emissions and the other societal costs of that energy use. Simply netting off solar PV generation with energy consumption without considering time-of-use, time-of-generation and storage will overestimate the downward pressure that solar PV will have on energy costs, emissions and the energy system.
- The EEC strongly supports the expansion of NatHERS to 'In-Home Assessments' of new and existing homes. Replicable and comparable ratings for new and existing homes, especially at the point of sale, will enable consumers to compare and select homes that meet their preferences for thermal performance, will which create more demand for the construction and retrofit of more efficient homes. Robust ratings will also help home-owners identify key features for the retrofit of their homes; and
- The EEC supports the use of the National Scorecard Initiative (NSI) as a tool to deliver In-Home Assessments. The EEC congratulates the Victorian Government for its nation-leading work on the NSI. In order that the NSI can be an effective tool at disclosing the energy efficiency of homes as the point of sale, the EEC strongly recommends harmonizing the NSI with the broader NatHERS program, which means minor adjustments to the NSI to:
  - o Focus on passive thermal comfort, including focusing on energy use per meter squared as the core metric, rather than total energy bills; and
  - o Consider the time of both energy use and generation, as recommended above for Whole-of-Home ratings.
- The EEC accepts the use of multiple rating tools, as long as these tools produce replicable and comparable ratings. Consistent ratings are critical for buyers to be able to

compare properties and avoid vendors 'shopping around' to find tools that will deliver the highest rating.

- The EEC urges better compliance and quality assurances processes to ensure that buildings are constructed to at least the performance level modelled in NatHERS. The lack of compliance around as-built energy efficiency performance in Class 1 and Class 2 buildings is part of the wider set of issues identified in the Shergold-Weir 'Building Confidence' report, but deserves a dedicated focus.

The EEC looks forward to continuing to work on the NatHERS program with the Department of Industry, Science, Energy and Resources. If you have any questions on the points raised on this submission, please contact me via [rob.murray-leach@eec.org.au](mailto:rob.murray-leach@eec.org.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Rob Murray-Leach', with a stylized flourish at the end.

Rob Murray-Leach  
Head of Policy  
Energy Efficiency Council