



8 August 2012

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Steven Graham
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

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australand.com.au

Dear Steven,

Re: Consultation Paper: National Electricity Amendment (Connecting Embedded Generators) Rule 2012, AEMC, 14 June 2012, Sydney

Australand Property Group is pleased to provide this submission in support of the above mentioned proposed rule change.

Australand is one of Australia's leading diversified property groups. Australand has three operating divisions being Commercial & Industrial, Residential and Investment Property. It employed 614 permanent staff members as at 30 June 2012. Its operations are located in Sydney, Melbourne, South East Queensland, Adelaide and Perth and a sales office in Hong Kong servicing the Asian market. As at 30 June 2012, the Investment Property division had a total portfolio value of \$2.3 billion with 70 properties, including 3 properties under development.

We have completed a number of projects that have incorporated sustainable design features to improve building efficiency, reduce operating costs and minimise environmental impact. We have developed over 220,000m² of Green Star projects and have an average NABERS Energy rating for our office portfolio of 4.1 stars, representing best practice energy efficiency.

We continually investigate opportunities to improve building performance however embedded energy generation has not been incorporated into any of our projects to date due to a number of issues and risks that have come to our attention during the feasibility stage. These include:

- Lack of a clear, standardised process with defined timeframes
- Uncertainty in whether an application will be approved
- Uncertainty in upfront costs for a grid connection application
- Unknown connection costs
- Lack of clarity on timeliness and costs for any augmentation works

A particular project that we recently considered was a 200kW grid connected solar PV system on an industrial facility we own in Melbourne. Our research and analysis concluded the system would be of benefit to both the prospective tenant and Australand as building owner. However the risks and lack of certainty referred to above were too significant to enable us to proceed. These issues were a key factor in the proposed system not being installed. A clear, standardised process with understood costs, timeframes and responsibilities would have a significant contribution to internal approval of such a project.



The issues referred to above are critical in order for a feasibility study to be effectively completed and for our business to undertake an embedded energy project. It is for these reasons that we fully support the proposed rule change.

Please do not hesitate to contact me should you wish to discuss this any further.

Kind regards,

A handwritten signature in blue ink, appearing to read "Rob Wallace". The signature is fluid and cursive, with the first name "Rob" being more prominent and larger than the last name "Wallace".

Rob Wallace
General Manager – Investment Property
Australand Property Group