

18 July 2025

Guarantee of Origin and Trade Section  
Department of Climate Change, Energy, the Environment and Water

Via email: [guaranteeoforigin@dcceew.gov.au](mailto:guaranteeoforigin@dcceew.gov.au)

Dear Guarantee of Origin and Trade team

**RE: Guarantee of Origin Scheme consultation**

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide feedback on the Guarantee of Origin (GO) Scheme legislative instruments and Concept Paper – Energy storage systems. GBCA supports the development of the GO Scheme and appreciates the opportunity to provide input to the design of the Scheme. We welcome the Department of Climate Change, Energy, the Environment and Water's continued collaboration with industry to ensure that renewable electricity certification and certification for emissions associated with building products support robust, consistent and transparent claims for building sustainability.

GBCA's purpose is to lead the sustainable transformation of the built environment. We do this primarily through our core functions:

- We rate the sustainability of buildings, fitouts and communities through Australia's largest national, voluntary, holistic rating system – Green Star.
- We educate industry, government practitioners and decision-makers, and promote green building programs, technologies, design practices and operations.
- We advocate policies and programs that support our vision and purpose.
- We collaborate with our members and other stakeholders to achieve our mission and strategic objectives.

Green Star is Australia's most widely used sustainability rating system for the design, construction and performance of buildings – including social infrastructure – fitouts and communities. Green Star aims to transform the built environment by:

- reducing the impact of climate change
- enhancing our health and quality of life
- restoring and protecting our planet's biodiversity and ecosystems
- driving resilient outcomes for buildings, fitouts, and communities
- supporting and rewarding the development and use of sustainable products and materials
- contributing to market transformation and a sustainable economy.

The Climate Positive Pathway has been developed as a central element of the Green Star rating system. It is designed to deliver buildings that are fossil fuel-free, powered by renewables, and low in embodied carbon. The Green Star rating tools accept NABERS Energy ratings and modelling for NABERS Commitment Agreements as evidence for credits relating to energy use and the NABERS Renewable Energy Indicator (REI) aligns with the intent of the Climate Positive Pathway.

We note that the NABERS team has provided a submission to the GO Scheme consultation, and we support and emphasise the messages within their submission. In particular:

### **Renewable energy and energy storage systems**

We note that the GO Scheme proposes similar mechanisms to NABERS in its requirements for accounting off-site renewable electricity purchases in relation to certificate creation and retirement, particularly for energy storage systems. GBCA and NABERS support this alignment to achieve:

- Clear interoperability between GO Scheme certificates, NABERS REI, Green Star, and Climate Active.
- Standardised documentation formats for Large-scale Generation Certificates (LGC) surrender and Renewable Energy Guaranteed Origin certificates (REGO) retirement to streamline NABERS, Green Star, and Climate Active audits.
- GO Scheme guidance to align with NABERS REI methodology to avoid double counting and ensure consistency.

The Concept Paper outlines a robust framework for certifying electricity dispatched from energy storage systems as renewable, contingent on:

- Direct supply relationships with renewable generators.
- Retirement of REGOs to match imported electricity adjusted for efficiency losses.

GBCA supports this approach and recommends:

- That REGO certificates be made traceable and auditable in a manner compatible with NABERS REI documentation requirements (NABERS Metering and Consumption (MAC) Rules - Section 11.8) and Green Star's guidance ([Climate Positive and our Net Zero Ambitions – Appendix A](#)).
- That efficiency factors used in REGO calculations be standardised and published, allowing GBCA to validate renewable claims made via energy storage.
- That banked renewable electricity be clearly timestamped and limited to 36 months, consistent with Green Star's treatment of certificate retirement.

GBCA supports NABERS' recommendation that the GO Scheme ensures the interoperability between LGCs and REGO certifications. NABERS and Green Star currently requires detailed documentation for renewable energy claims, including:

- REC Registry confirmation of LGC surrender, with the following information:
  - a) Date of purchase.
  - b) Volume of LGCs surrendered, e.g. 1 LGC = 1 MWh = 1,000 kWh.
  - c) Date of LGC creation.
  - d) LGC certificate numbers (or range).
  - e) Address of the building.
  - f) Period of electricity consumption for which the LGCs have been surrendered.

Note: The address of the building and period of electricity consumption can be entered in the "surrender note" field of the REC Registry. NABERS recommends, as best practice, entering the information into the surrender note using the following naming convention:

“ADDRESS/SCOPE/RATING PERIOD”: “100 Smith Street Sydney/Base building/01-01-2023 to 31-12-2023”.

- Independent third-party audits for bulk certificate allocations
- Contractual evidence for on-selling arrangements.

GBCA supports the NABERS recommendation that the GO Scheme:

- Adopt similar documentation standards for REGO certificates
- Enable ease of verification (e.g. GO certificate registries to be easily accessible)
- Clarify treatment of shared systems and embedded networks, especially where renewable electricity is distributed across multiple premises.

It is vital that the design of the GO Scheme integrates and aligns with methodologies and systems already widely used in the Australian market. GBCA reiterates the recommendations from the NABERS submission below which will support integration of the NABERS system, and those encouraged by the Green Star system with the GO Scheme:

1. Interoperability: Ensure REGO certificates can be used as valid inputs for NABERS REI and Green Star calculations, with clear metadata (e.g. source, time period, retirement status).
2. Auditability: Align GO Scheme documentation requirements with NABERS Metering and Consumption (MAC) Rules - Section 11.8 and Green Star rules to facilitate streamlined audits.
3. Efficiency Transparency: Publish standardised round-trip efficiency factors for common energy storage technologies.
4. Shared Systems: Provide guidance on REGO allocation for shared energy storage and generation systems, consistent with NABERS treatment of embedded networks and on-selling, in Section 10.4.4 of MAC Rules – which Green Star recognises.

GBCA welcomes the opportunity for further consultation and collaboration in the design of the Scheme. To arrange further discussion or for additional clarification of the points made above, please do not hesitate to contact Katy Dean, Senior Policy Adviser, via email at [katy.dean@gbca.org.au](mailto:katy.dean@gbca.org.au).

Yours sincerely

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