

31 May 2017

Mr Pak-cheung CHAN  
Chief Engineer  
Energy Efficiency Division B

Electrical Mechanical Services Department  
Electrical Mechanical Services Department Headquarters  
3 Kai Shing Street,  
Kowloon, Hong Kong

**By Email**

Dear Mr CHAN,

**Re: Technical Guidelines on Retro-commissioning  
Comments from Business Environment Council Limited**

---

Over the last two decades, Business Environment Council Limited (“BEC”) has taken a leading role in advocating the business case for environmental excellence in Hong Kong. Our members are committed to actively engaging with the HKSAR Government (“the Government”) on a range of issues relating to the environment and sustainability.

BEC welcomes the Electrical and Mechanical Services Department (“EMSD”) to issue the Technical Guidelines on Retro-commissioning (“TG(RCx)”) to let the industry learn about the proper steps and procedures in conducting a proper retro-commissioning for existing buildings in order to achieve the energy saving target as stipulated in the Energy Saving Plan issued in 2015.

BEC would like to offer the following comments for EMSDs’ further clarification and consideration:

- a.) Paragraph 1.3 refers. It is suggested to include the definition as well as the scope of “existing building commissioning”, “re-commissioning” and “continuous commissioning in the appendix;
- b.) It is hoped that further clarification, real examples and the anticipated outcome could be illustrated for the difference between energy audit and retro-commissioning in TG(RCx);
- c.) Similarly, the definition of Energy Management Opportunities (“EMO”), Energy Saving Opportunities (“ESO”) and Energy Optimisation Opportunities (“EOO”) should be clearly differentiated. Examples of these 3 items should also be provided;
- d.) Section 3.6 “Applications of energy modelling in RCx” refers. Although energy modelling can be used to predict the energy consumption of different building services equipment, the simulated result may vary from the actual consumption. The application and accuracy of energy modelling used in RCx is in doubt; and
- e.) It is appreciated that standard forms for Stage 1 and Stage 2 of RCx, and templates for the comprehensive Retro-commissioning Plan are developed. However, those detailed templates would make some of the building owners/ building management companies misunderstand that they need to prepare sufficient resources to complete the forms and the plan. In such, it is suggested such templates are for reference only and building management can develop their own forms based on their operating



conditions. Simplified version could be provided to facilitate smaller scale building management companies to carry out retro-commissioning.

We hope that our comments are of assistance to EMSD in developing the final version of the TG(RCx), and welcome the opportunity to meet with relevant officials to discuss our recommendations in more details. Should you have any queries, please do not hesitate to contact the undersigned at 2784 3945.

Yours sincerely,  
For and on behalf of  
Business Environment Council Limited

A handwritten signature in black ink, appearing to read 'C F Leung', written in a fluid, cursive style.

C F Leung  
Director – Green Building & IAQ