

## **Ecovantage submission on NSW Energy Saving Scheme Rule Change Amendments-August2015**

In general Ecovantage supports proposed changes to NSW Energy Saving Scheme Rule. Please see below feedback to some of the proposed changes and questions raised:

### **1. Regional Network Factor**

**Feedback** – Ecovantage believes that the regional network factor of 1.03 is too low. A factor of 1.1 is more in line with the incremental cost of doing activities regionally. This includes the incremental costs of doing site visits when completing the audit.

### **2. Definition of Purchaser**

**Feedback** – Ecovantage strongly supports removal of definition of the Purchaser from the Methods.

### **Waste and Recycling**

**Feedback** – Ecovantage have advocated to make correct disposal for harmful waste a mandatory requirement for several years and believe that this has been a major shortcoming in the ESS and is probably indirectly responsible for harmful waste pollution in landfill. However through our extensive experience in collecting the recycling evidences, Ecovantage proposes that the requirement to be kept as a general recycling certificate with weights recycled or invoice rather than an evidence for the number of lights. There are many other evidences available to satisfy the requirement for evidence of the number of light replaced.

### **Mercury**

**Question 2: Do you think that the requirements of a Product Stewardship Scheme such as Fluorocycle are appropriate?**

Ecovantage strongly believes that this requirement is appropriate.

**Question 3: Do you think that the exclusion of Implementation post codes outside of the Metropolitan Levy Areas is appropriate?**

Ecovantage believes that the exclusion of the post codes is not appropriate.

### **Refrigerants**

**Question 4: Are the proposed documentation requirements for evidencing the recycling of refrigerants easily obtainable?**

**Feedback** – Ecovantage believes that the proposed documentation requirements are easily obtainable.

### **3. HEER**

#### **Amendment of bundling and Site Assessment requirements**

**Feedback** – Ecovantage supports proposed changes to bundling requirements to a minimum level of saving achieved rather than a percentage. We also support the removal of the requirement to identify all of the energy savings opportunities.

In our view the current abatement calculations for residential lighting will not be enough to stimulate the market to any significant level and need to be reconsidered.

Ecovantage does not support the co-payment requirements, forcing End-User contribution of any money towards the implementation. If there are sufficient energy savings to be delivered and all other requirements of the scheme are met, such as product registrations, then allow the market to determine the price of this service.

#### **Amend Downward Light Output Equipment Requirements-***(Activity Definition E1)*

**Feedback** – Ecovantage proposes that the initial downward light output of 500 lumens remain unchanged. Lowering down the output requirement will have effect on the quality of the lights for residential customers.

#### **Installation requirements for air conditioning units-** *(Activity Definitions D3 and D4)*

**Feedback** – Ecovantage supports the new requirements for qualification of the electrician to remove and install the air-conditioning unit, however Ecovantage proposes to change the requirement from installer to supervisor. Therefore installation need to be supervised by an electrician with licence from the NSW Department of Fair trading.

### **4. PIAM&V Method**

#### **Inclusion of gas and fuel switching savings**

**Feedback** – Ecovantage supports inclusion of gas and fuel switching in this method.

#### **Minimum statistical requirements for Energy Models**

**Feedback** – Ecovantage strongly support proposed changes to statistical requirements for Energy Models. This is based on our learnings from the process of having the first PIAM&V RESA approved. Ecovantage proposes that this adjustment should apply to all existing PIAM+V implementations. ie ACPs should be allowed to create ESCs for existing accreditations under the amended PIAM+V statistical adjustments.

#### **Measurement and Verification Professional**

**Feedback** – Ecovantage supports the principal of the proposed recommendation and we believe the NSW Government needs to consult with industry on the proposed criteria before they are made part of the Rule.

#### **Sampling sub-method**

**Feedback** – Ecovantage supports temporarily pause of this sub method to allow further development but would like to emphasise on the importance of this sub method and seek for acceleration on commencement date.

### **5. Commercial Lighting**

#### **Control Multiplier for Motion Sensors**

**Feedback** – Ecovantage strongly supports the inclusion of additional standard control multipliers for occupancy sensors scenarios as we believe that the current factors do not accurately represent the energy savings.

### **T5 Adaptor and LED tubes**

**Feedback** – Ecovantage supports proposed changes to allow energy saving to be achieved when replacing T5 Adaptor kits and Retrofitted Luminaires with more efficient approved lighting.

### **High Efficiency Motors**

**Feedback** – Ecovantage supports both proposed changes to use the Full Load Efficiencies of the new and old motor as well as proposed change to merge this sub-method into the High Efficient Appliances for Business Method.

### **High Efficiency Appliances for Businesses**

**Feedback** – Ecovantage strongly supports proposed changes to Activity Definition F5 to include the replacement of full fan unit and motor only replacement. Ecovantage also supports inclusion of upgrading ventilation fan motors to EC motors to this Activity.

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