

29 January 2018

SUBMISSION

ENERGY SAVINGS SCHEME RULE CHANGE 2017-2018 CONSULTATION

ABOUT GREEN STRATA

Green Strata Inc is a unique, non-profit association focused on education and advocacy to assist owners and occupants of residential strata complexes in improving the sustainability of their common and private property.

We do that through our website (www.greenstrata.org.au); by delivering workshop and education sessions facilitated by owners corporations, local councils, government agencies, environmental organisations, strata managing agents and building managers; and by lobbying at all levels of government for greater understanding of the nature of the sector, targeted incentives for sustainability improvements in existing strata complexes, and for higher sustainability standards in the construction of new strata developments.

COMMERCIAL LIGHTING ENERGY SAVINGS FORMULA

We ask that you re-assess the proposed changes to Asset Lifetimes for the common areas of Class 2 buildings, particularly for the Equipment Group “Linear – T5 or T8/T12 to LED”.

We recommend that Asset Lifetimes for this sector do no change at this stage.

Your research

It appears that the research undertaken and summarised in Appendices B and C did not fully capture the nature of existing and potential upgrades to common area lighting, as evidenced by the following:

Appendix B, 6.1. Segmentation and Product Types

Apartment buildings are included in the “residential” segment and the lighting focus is inside the home - common areas are not mentioned

“Each home normally contains a number of different lighting product types, depending on the use of each room. The emphasis is usually on the aesthetics of the product, its colour, its price, and its light output, and efficiency is often a secondary consideration. Traditionally, general lighting service (GLS) and downlight fittings dominated this segment. In the past two decades, there has been an increased uptake of recessed halogen downlights, as well as compact fluorescent lamps (CFLs) and halogen overheads (known as GLS lamps).”

Appendix B, 18.4. ESS impacts

The assumption is incorrectly made (possibility due to lack of data granularity) that common areas upgrades are limited to downlights.

“Although there was only a very small amount of ESS activity in the residential lighting sector (around 8000 downlights to date, presumably in common areas of multi-unit apartment buildings)”

Appendix C

The modelling in Appendix C was restricted to *“Downlight upgrades in residential buildings (for common areas, which are covered by the ESS commercial lighting formula)”*

Types of lighting upgrades in Class 2 buildings

Yes, halogen downlights are being replaced, typically in foyers and corridors on residential floors. However, lighting types in different parts of the common areas of apartment buildings are a mix of those found in residential, commercial and industrial sites.

Medium to high-rise apartment buildings also need to replace T5 or T8/T12 tubes that run 24x7 in car parks and fire stairs – often numbering in the hundreds for individual buildings.

High bays are also often present in car parks.

Timing of lighting upgrades in Class 2 buildings

Unlike commercial sectors, the momentum for lighting upgrades has only started to build in the last couple of years. Now’s the time to incentivise more action, not assume it will happen anyway.

The uptake of upgrades to common areas tends to lag the commercial sectors by several years. The main reasons for this are:

- Lack of information (as confirmed in the research undertaken by Common Capital for the Office of Environment & Heritage in 2015 *“Residential multi-dwelling EUAs in NSW”*)
- The inherent obstacles and delays experienced in the maintenance, upgrade and financing of collectively owned common areas assets, where decisions must be made in accordance with strata legislation

Large-scale refurbishment of foyers and corridors on residential floors does not occur as frequently as in other sectors. Cycles are more in the 10-15-year range.

The incentives offered through the ESS need to recognise and respect the differences in this sector.

We trust you will consider the points we have raised, and we are very amenable to further discussions as to how the Energy Savings Scheme can be best tailored to help achieve significant reductions in energy consumption for this large and growing sector.

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