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Director, Climate Change and Energy Savings Policy
NSW Department of Planning, Industry and Environment
energysecurity@environment.nsw.gov.au

[LED SAVES] – Energy Security Target and Safeguard 2020

Thank you for the opportunity to submit feedback on the NSW Government's Energy Security Target and Safeguard Consultation Paper.

We have:

1. Been involved in the NSW ESS and the Victorian VEU Schemes since July 2014.
2. Have created almost 1.98 million VEECs and 175,651 ESCs in these two Schemes.

We support Energy Mad's Submission (Titled "*Energy Mad – Energy Security Target and Safeguard 2020*") in response to the NSW Government's Energy Security Target and Safeguard Consultation Paper.

In particular:

1. We support Energy Mad's proposal that the **"Residential Building Lifetime" for the six HEER Schedule E Lighting Activities be harmonized to 15 years**. This would result in the Activity Definition E11 Residential Building Activity Energy Savings formula being amended to the Deemed Activity Electricity Savings equals:

$$LCP \text{ of new Lamp} \times (\text{luminous efficacy of new Lamp} / 33.9 - 1) \times 1260 \times 10 / 10^6$$
2. We support Energy Mad's proposal to **replace the licensed plumber implementation requirement for Activity E6** with an **amended implementation requirement for Activity E6 allowing electricians to change showerheads** when they are doing other HEER Schedule E Lighting installations.
3. Furthermore, align with VEU scheme, allow installers completed the following MST units (one unit from each group) to conduct HEER activity E3 "Replace parabolic aluminised reflector (PAR) lamp with efficient luminaire and/or lamp" and E6 "Replace an existing showerhead with an ultra-low flow showerhead".

| Group | Available Mandatory Safety Training units | |
|--|---|--|
| Group A – units relating to health and safety risks and OH&S requirements | VU21858: | Minimise health and safety risk when retrofitting for energy and water efficiency. |
| | CPCCOHS2001A: | Apply OHS requirements, policies and procedures in the construction industry. |
| | CPCPCM2043A: | Carry out WHS requirements. |
| Group B – unit relating to energy and water efficiency retrofits | VU21859: | Undertake retrofitting to improve energy and water efficiency. |
| Group C – units relating to working at heights | CPCCCM2010B: | Work safely at heights. |
| | CPCCCM2010: | Work safely on scaffolding higher than two meters. |
| | RIIWHS204D: | Work safely at heights. |

4. We believe this would allow us to generate significant financial incentives to deliver HEER residential Schedule E Low Cost Activities.

Kind Regards

Xiang Hu
Managing Director
LED SAVES