



DAIKIN AUSTRALIA PTY LIMITED

Head Office

62-66 Governor Macquarie Drive, Chipping Norton
N.S.W. 2170, AUSTRALIA

ABN 62 000 172 967 ACN 000 172 967

P.O. Box 120 Moorebank, N.S.W. 1875

Telephone: (02) 9725 8888

Sales Fax: (02) 9755 2017

Admin. Fax: (02) 9755 3450

Energy NSW

sustainability@environment.nsw.gov.au

10 May 2022

Proposed Peak Demand Reduction Scheme Rule

Thank you for the opportunity to comment on Proposed Peak Demand Reduction Scheme Rule for New South Wales.

Daikin Australia is recognized as a leading air conditioner manufacturer. As one of the regions most trusted names in air conditioning, Daikin can be found in homes, offices, hotels, and shops across Australia and around the world. We have ten branches and six major service centres nationwide including a production facility in Australia. We distribute products mainly through the trade specialist installer.

We would like to thank the Department for the work undertaken including active consultation with industry.

AS/NZS 4755 Alternatives for air conditioners

The AS/NZS 4755.3.1:2014 version standard specifies a reduction reference that is dynamic and determined by energy measurement immediately before the event. The dynamic reference value is flawed because the required reduction for equipment that is not operating before the demand response event is not defined.

According to references (1) & (2), industry has not applied the AS/NZS 4755.3.1 2014 standard.

AS 4755.2 is currently under development and has a patent issue to resolve. The latest public comment draft has the reference demand response level from rated capacity same as AS/NZS 4755.3.1:2012. There is future anticipation to revise AS/NZS 4755.3.1:2014 to reference rated capacity instead of normal operation to harmonise the series.

A lead time of at least four years would be necessary from publishing date of AS 4755.2 to permit development of capable products.

Our products support AS/NZS 4755.3.1:2012 and raise no objection to requiring the voluntary DRM 2 & 3 mode.

We believe the AS/NZS 4755.3.1:2012 version is the only possible standard currently available for use.

We trust the above is of assistance and for further clarification please contact the writer at gknox@daikin.com.au or phone 0477 011 288.

Yours Faithfully

Gary Knox

BEng (Hons) F.AIRAH

Engineering Manager

DAIKIN Australia Pty. Limited

Adelaide: 44 Galway Avenue, North Plympton, S.A. 5037
Telephone: (08) 8193 2300 Fax: (08) 8297 0495

Brisbane: 6 McKechnie Drive, Eight Mile Plains QLD 4113
PO Box 4431, Eight Mile Plains Qld 4113
Telephone: (07) 3347 3636 Fax: (07) 3349 4707

Canberra: 3/65 Tennant Street Fyshwick ACT 2609
PO Box 2371 Canberra City ACT 2601
Fax: (02) 6280 5405

Darwin: 1/3 Swan Crescent Winnellie NT 0820
PO Box 36233 Winnellie NT 0820
Telephone: (08) 8947 4290 Fax: (08) 8984 4996

Melbourne: 15 Nyadale Drive, Scoresby, Vic. 3179.
PO Box 289, Ferntree Gully, Vic. 3156
Telephone: (03) 9237 5555 Fax: (03) 9237 5580

Newcastle: 52A Pendlebury Road, Cardiff, NSW 2285.
PO Box 48, Adamstown, NSW 2289
Telephone: (02)4954 8433 Fax: (02) 4954 8431

Perth: 2/19 Dowd Street, Welshpool, W.A. 6106
Telephone: (08) 9353 8555 Fax: (08) 9353 8500

Townsville: Suite 6/202 Ross River Rd, Townsville, 4814
Telephone: (07) 4755 2300 Fax: (07) 4755 2311

References:

(1) Decision RIS Smart Appliances - October 2019

“Most submissions made the point that if compliance was to be mandated, the option should be the 2012 version of AS/NZS 4755.3.1, not the 2014 version as proposed in the Consultation Paper. It was submitted that none of the more than 1,000 models on the market that claim compliance with AS/NZS 4755.3.1 meet the 2014 standard ...” Page 57.

<https://www.energyrating.gov.au/document/regulation-impact-statement-decision-smart-demand-response-capabilities-selected-appliances>

(2) CSIRO Technical Report EP175701

“The responses to DRM2 and DRM3 commands were observed in some makes ... but not in others. This observation suggests that many air conditioners implement the 2012 version of the AS/NZS 4755 standard.” page2.

<https://publications.csiro.au/rpr/pub?pid=csiro:EP175701>