

Energy Savings Scheme Rule December 2015 consultation submission from: Expert Group

Submission content:

Dear Sir/Madam,

I am writing to you to recommend a rule change or minor edit that involves updating the year cited on the technical in the deemed air conditioning methodologies (Activity Definition F2, F3, F4, D3 and D4).

Now the simplest way to change this would be to add another note that says the technical standards are updated from time to time - this is what I understand is done in some areas with the ERF methodologies or they don't cite the technical standard in the ruling only definitions, and let the GEMS legislation handle the detail of which standard a product should be tested to, etc.

For example, Activity Definition F4 - INSTALL A NEW HIGH EFFICIENCY AIR CONDITIONER cites "The End-User Equipment must be an Air to Air Heat Pump or Air Conditioner (AC) as defined in AS/NZS 3823.1.1:2012, AS/NZS 3823.1.2:2012, or AS/NZS 3823.1.4:2012."

The current standard AS/NZS 3823.2 - 2013 includes Clause 3.11 that says "VRF multi-split systems shall be tested in accordance with AS/NZS 3823.1.4 or an alternate applicable International or regional standard listed in Table 3.3 or simulated AS/NZS 3823.3 as permitted in Clause 3.4, Items (c) and (d).....and Table 3.3 lists ISO 15042, ISO 5151, EN 14511 and JIS B 8615-1".

This change was included in the GEMS legislation and products are registered based on JIS B 8615-1 (please check Daikin VRV products as an example) and others approved under AS/NZS 3823.2 - 2013, and therefore are eligible for consideration under the Commercial Appliance Methodology.

In conclusion, the technical standards should be updated to the latest version (i.e. 2013) or the ruling amended so it permits updates when they occur from "time to time" outside the Rule update cycle.

Yours truly,

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