

Ecovantage submission on NSW Energy Saving Scheme Rule Change 2016-2017 - 21st Dec 2016

Thank you for giving Ecovantage the opportunity to provide feedback on the NSW Energy Saving Scheme Rule Change 2016-2017.

In general Ecovantage supports the proposed changes. Please see below our specific feedback:

Question 7 Is the proposal to expand the ESS Metered Baseline NABERS sub-method to include hospitals appropriate?

Ecovantage supports the rating of buildings for energy efficiency and believe that it should be extended to all buildings as the tool allows. We also support the ESS certificate benefit being available to companies improving the rating of the buildings.

Question 8 Are there changes to ESS Rule requirements around the purchaser co-payment that could meet the objectives of consumer engagement and quality lighting outcomes while reducing red tape and compliance costs?

Ecovantage believes that the proposed changes to the ESS co-payment requirement will be a huge barrier to the ESC registration and will slow down the compliance process. Due to different payment structures and financing, for example some customers will negotiate finance packages and / or extended terms – hence it is not commercially viable to hold the registration of the certificates until the co-payment has been completed.

Ecovantage's recent audit and experience with the co-payment requirement resulted in a more expensive (33% higher) and longer audit (approximately twice as long) and higher associated administrative cost.

Ecovantage does not support the use of a co-payment as a quasi-quality assurance tool and believe that a tightening of product registration, in field audits by IPART and increased warranties would be a more appropriate approach.

To help ensure that consumers receive quality products, Ecovantage proposes a more stringent process for product approval and introduce minimum warranty periods (eg. a 3 year minimum warranty for low cost lights such as downlights and 5 years for higher cost lights such as high-bays) as a requirement for product approval. This should also involve revisiting the products that are currently approved under the scheme.

Question 10 Are the percentages of cooling season and heating season reflective of an average of how often buildings across NSW are in cooling and heating mode respectively?

Ecovantage believes that the heating/cooling season will be influenced by the type of building, eg. most data centres and food production / storage facilities will actively cool 100% of the time. Hence this should be considered before making any rule change.

The rules are currently based on data and any changes should reflect new data as captured and analysed. We would like to see the empirical evidence being used to make these changes.

Ecovantage also recommends any changes proposed need to have a period of notice (eg 6 months) where the industry will be able to communicate the changes to Original Energy Savers and also reduce the impact on existing quotes/projects.

Question 12 Do you wish to be part of a targeted consultation on potential rewording of Clause 5.4(c) in order to make this clear?

Yes, Ecovantage wishes to be part of the consultation.

Question 13 Do you agree with amending the definition for Small Business Building to allow Energy Savings to be calculated for BCA class 5, 7b and 8 buildings? If not please indicate why and provide us with an evidence base to support your justification.

Ecovantage strongly supports amending the definition for Small Business Building, this will allow more small businesses to participate in the Scheme through straightforward "deemed" methods.

Ecovantage would also like to take this opportunity of the current rule change consultation to support the EECCA request that the exemption to provide evidence of recycling of mercury containing lights in regional areas is removed. This would then require all ACP's working within the ESS to provide evidence of correct disposal.

Thank you again

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