



04/11/2022

## NSW Government Rule Change 2022 Consultation

Submitted to Stephen Procter, A-Director – Program and Market Development – Safeguard | Energy, Climate and Sustainability | Office of Energy and Climate Change, New South Wales Government

Via [sustainability@environment.nsw.gov.au](mailto:sustainability@environment.nsw.gov.au)

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## Introduction

The Green Guys Group Pty Ltd (TGGG) has participated in the NSW Energy Saving Scheme as an ACP since 2011.

We appreciate the opportunity to respond to the NSW government ESS Rule Change Consultation

We are supportive of the consultation response provided by The Energy Savings Industry Associations response (ESIA) however wanted to bring particular attention to the below points.

Matters relevant to this consultation.

### 1. Refrigeration cabinets activity is not mentioned in the consultation

The current flat customer co-contribution rate of \$250 + gst, per unit is too high for smaller refrigerators. It provides little additional incentive beyond the current retail cost for consumers. A lower co-contribution level for smaller refrigerators (say <200 or 300 litres) should be considered. We suggest a rate somewhere in the vicinity of \$50 or replacement and \$100 for new, per unit, would be appropriate.

We also suggest co-payment to be split as the flat rate is currently resulting in a perverse incentive for energy users to keep their old inefficient unit, instead of having it removed, and instead choosing a *non-replacement* incentive for new installations.

### 2. Commercial lighting activity

Industry notes that the Government has not yet responded to the consultation process that it launched on the phase out of some aspects of commercial lighting in 2020.

Industry is keen to meet with government to better understand its likely approach to commercial lighting in particular:

- (i) The commercial lighting sector is not a single homogenous market, and that each subsector needs to be considered separately.
- (ii) Industry needs to be given sufficient notice and provided with a reasonable transition period

Kind regards,

Ben Henderson  
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