

TO

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NSW Office of Energy and Climate Change

ESS-Energy Saving Scheme

From – Kass & CO Pty Limited

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Subject- Call For Submissions

We wholeheartedly embrace the proposed changes in the regulations, as outlined in the comprehensive explanation below. We do, however, wish to draw attention to a few challenges and areas where a degree of flexibility may be warranted.

Amending the baselines for calculating energy savings from residential and small business hot water upgrades

The concept of reducing the baseline in response to actual water usage is indeed a valid consideration. Additionally, it is worth noting that the inclusion of Peak Demand Reduction (PRCs) for residential customers could also be justified. This proposition is based on the observation that many residences consume water during peak hours. Furthermore, this approach aligns with the growing prevalence of Work from Home scenarios, where residential water consumption patterns may exhibit fluctuations and higher demand during traditional business hours. Thus, introducing PRCs for residential customers appears to be a logical and reasonable measure to better align with actual water usage patterns and promote responsible water consumption practices.

Addition of co-payments for hot water system installations and upgrades

We wholeheartedly endorse the notion of implementing an additional copayment, as it serves to heighten customers' engagement and diligence in overseeing the installation process of superior products, while adhering to the highest plumbing standards. Furthermore, this approach will compel ACPs to actively engage with customers, fostering a collaborative environment that is poised to yield superior and quality outcomes.

The two transition options for heat pump hot water systems

The supply of hot water is a fundamental necessity for both residences and businesses. Our strategy places a strong emphasis on meaningful engagement with customers, with the aim of clarifying the benefits of heat pump technology, top-tier products, and strict compliance with plumbing standards. This strategy results in an installation procedure distinguished by its effortless execution and enriched by thorough approach, ultimately guaranteeing the provision of superior workmanship, in contrast to uninformed installations.

To attain such outcomes, it is imperative that we have the flexibility to allocate the necessary time during the assessment and installation phases. Imposing strict time constraints would unduly burden the process, rendering it cumbersome. Consequently, we propose a system that allows for installations to occur at any juncture subsequent to the signing of the Nomination form, as long as it transpires before any stipulated threshold date, if applicable.

Furthermore, it is essential to consider the context of larger-scale projects, where installation timelines often exceed the conventional 3–6-month window or more. These projects frequently entail fluid scheduling dynamics, particularly when dealing with significant clients. Granting the independence to perform installations at any point after the acceptance of the Nomination form serves to uphold the standard of work, accommodating the specific requirements of diverse project scopes. Strict time frame inheritance tends to put pressure on installation terms resulting in unsafe work environment for employees and poor installations for consumers. By Allowing flexible time frames, you encourage safe work practices, safe work environment for employees and high-quality installations for customers.