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NSW Office of Energy and Climate Change

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Peak Demand Reduction Scheme rule change 2 Consultation

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.

Daikin Australia has ten branches and six major service centers nationwide including a production facility in Australia. We distribute products through the trade specialist installer.

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

Daikin supports peak demand response of HVAC equipment in the PDRS but believes it should be aligned with national policy and international standards. The AS 4755.2 and AS 4755.3.1 standards have been developed in collaboration with industry and governments to allow for a standardized way for the demand response of HVAC equipment. Most manufacturers normally allow this as an optional extra due to the extra cost of a component that's not a requirement. Daikin has introduced most products with an inbuilt AS 4755.3.1:2012 inbuilt DRED card in preparation for future market requirements under 19 kW of cooling capacity.

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Response to relevant questions. All other questions Daikin has no comment.

Question 5 – Is the new air conditioner requirement, as written in the rule, going to be effective to enable consumers to participate in demand response programs using their new air conditioner?

Daikin currently has AS4755.3.1:2012 DRED cards inbuilt to all products under 19 kw of cooling capacity, so the requirements for inbuilt DRED card we support, but to a cooling capacity limit that will need to be aligned nationally. Having an inbuilt demand card will allow easy connection for a DRED system at a later stage rather than having to source the part from the manufacturer later.

Question 20 – Do you support the data assumptions and proposed calculation method for certificates for HVAC3.

With no feedback from the air conditioner how do you know that the demand response has occurred. If there is a requirement to use internet connected devices to perform demand response, then having 2-way communication will achieve the best outcomes rather than one-way signals. Knowing the room temperature and setpoint before the demand response event will give a better estimation of the demand response savings.

For example, if the setpoint was known to be 22°C and the room temperature was known to be 22°C before a demand response event, shifting the setpoint to 26°C will create the same effect as DRM1 from AS 4755.3.1 which is thermo off or forced compressor to stop. Therefore, demand response calculation is different to as proposed which is based on greater amount of assumptions.

Question 21 – Are the additional requirements you recommend we add to HVAC3 to ensure the consumers get the best outcome.

Simply stating that the ‘use of third-party control of air conditioners’ may lead to a reduction in competition as the aggregator may elect to use one specific brand of third-party controller and will restrict innovation. Using OpenADR like in California and other jurisdictions around the world will allow aggregators to connect with multiple brands of controllers both third party and proprietary in a 2-way communication model. Also, this will allow for future advancements in home control system using information from the aggregators.

References

OpenADR

[About OpenADR](#)