

25 January 2018

Tim Stock
Manager Clean Energy Programs
Energy Delivery and Coordination
NSW Department of Planning and Environment
Division of Energy, Water and Portfolio Strategy
By email: energysavings.scheme@planning.nsw.gov.au

Dear Tim,

Re: Energy Savings Scheme Rule Change 2017-18 Consultation Paper

Thank you for the opportunity to comment on NSW Energy Savings Scheme ("ESS") Rule Change Consultation Paper 2017-18 (the "Consultation Paper"). Out Performers has provided input into the Energy Efficiency Council's response and our views are reflected within this submission.

While potential changes to the ESS Rule are being considered I would like suggest two amendments to the Project Impact Assessment with Measurement and Verification method. These amendments are not included in the Consultation Paper but in my view will improve the efficiency of this method.

1. **Site unchanged:** Section 7A.7 clause (b) requires that the "normal year represents a typical year for operation of the End-User Equipment within the maximum time period for forward creation". In the case of a manufacturing site, production is typically an independent variable and included in the normal year. Production is also commonly expected to increase in future years. This is problematic within the current wording of the Rule as:
 - a. Forward projections of production are typically only available for a period of 1-3 years. It is not reasonable to project production over a ten year period.
 - b. Forward projections of production are often commercially sensitive and cannot be obtained.
 - c. Increasing the normal year production values causes a reduction in effective range as the range of the normal year no longer matches the baseline or operating periods.

It is recommended that the words "within the maximum time period for forward creation determined in accordance with clause 7A.12" be removed from the Rule.

2. **Multiple PIAM&V Claims per project:** Page 20 of the current PIAM&V method guide contains the following statements relating to the implementation data sheets:

There are no restrictions on how many implementations can be bundled together in the same Implementation Data Sheet. However:

- ▼ ACPs must apply to register all ESCs included in an Implementation Data Sheet in a single application
- ▼ ACPs cannot split energy savings calculated from a single implementation across two or more Implementation Data Sheets, and
- ▼ each Implementation Data Sheet must only include the calculation of energy savings that are taken to have occurred in the same calendar year (commonly referred to as 'vintage').

These statements suggest that all energy savings from an implementation cannot be split across multiple sheets. These seem contradictory to the ability to conduct a PIAM&V annual or top up creation. In addition to this, it unnecessarily limits ACP from forward creating certificates (with say an 80% effective range) and then waiting a number of months to complete the effective range before making a second claim (whilst removing the first claim as counted savings). This discourages ACP and Energy Users from participation of PIAM&V do to unnecessary delays in certificate revenue.

Thank you once again for the opportunity to engage with the NSW Government regarding the ESS. If you'd like to discuss the proposed amendments suggested in this letter then please contact me directly on 0424 138 205 or michael.wiener@outperformers.com.au.

Yours sincerely,



Michael Wiener
General Manager