

NSW Energy Savings Scheme (ESS) 2017-18 ESS Rule Change

Ecovantage welcomes the opportunity to comment on the NSW Energy Savings Scheme Consultation on 2017-18 ESS Rule Change. Ecovantage provides the following responses to questions posed in the consultation paper.

Question 1: Do you agree with the proposal to preserve preceding transitional arrangements within the Rule? If not, please provide an alternative approach and supporting evidence to justify your response.

Ecovantage supports the proposed changes.

Question 2: Do you agree with the intention to collect additional customer data, including NMI and DPI? If not, please provide an alternative approach and supporting evidence to justify your response.

Ecovantage has extensive experiences on collecting utility bills under the ESS rule. Collecting the utility bill is a privacy issue for some large energy users with special contracts. It will also add an extra compliance check to the process. Considering that OEH can request access to customer data base from ACPs on a sample of projects, Ecovantage proposes that OEH allocate a budget for gathering such information.

Question 3: Do you agree with the proposal that ACPs are required to ensure that the LED lights installed under the PIAM&V method meet the relevant equipment requirements outlined in the ESS Rule? If not, please provide an alternative approach and supporting evidence to justify your response

PIAM&V is a very strict and detailed methodology to ensure that the actual energy savings are captured and measured. The methodology itself has equipment quality check including providing technical information. Ecovantage suggests that additional documents such as ERAC requirements are provided when lighting equipment is used under PIAM & V method. Based on Ecovantage's experience, the PIAM&V method could be used for lighting upgrade projects for only two scenarios: 1. Specific application, i.e. hospitals and tunnels or specialised lighting. 2. Where lighting is a small proportion of the total project. For both scenarios it would not commercially viable to register the product under commercial lighting rule due to product characteristics and low volume.

Question 4: Do you agree with the proposed changes to the Maximum Time Period for Forward Creation when using the default decay factors? If not, please provide an alternative approach and supporting evidence to justify your response.

Ecovantage supports the proposed changes.

Question 5: Do you agree with allowing ACPs to top up ESCs for one or more consecutive years at the same time, provided they calculate Additional Energy Savings for each year separately? If not, please provide an alternative approach and supporting evidence to justify your response.

Ecovantage believes that this will save a lot of administrative time for ACPs and supports the proposed changes.

Question 6: Do you agree with the proposal that ACPs are required to ensure that the LED lights installed under the Metered Baseline Method meet the relevant equipment requirements outlined in the ESS Rule? If not, please provide an alternative approach and supporting evidence to justify your response.

No Comment.

Question 7: Do you agree with the proposal to update the SONA Equipment Electricity Savings tables? If not, please provide an alternative approach and supporting evidence to justify your response.

No Comment

Question 8: Do you agree with the proposed Asset Lifetime values? If not, please provide an alternative approach and supporting evidence to justify your response.

The change to the asset lifetimes with different time periods appears to be overly complex. This will impact on the administration costs of ACP's who will have to adjust their process and systems to allow for these changes. If this new approach is adopted then we believe it should be simplified and streamlined.

In Victoria the recent rule change was based on a discount factor for lighting. While we don't support a reduction in the number of ESC's allocated to lighting, for ACP's that operate across different markets it may be much easier if a similar approach is adopted in NSW.

In the proposed asset life table, the categories do not take into consideration areas such as carpark and common areas of BCA Class2 and 3. Ecovantage believes that early replacement period in these areas are different in compare with other industries.

To streamline the process Ecovantage proposes to limit the building categories to *Industrial* and *Others* and use a weighted average to calculate the asset lifetime for other classification.

Question 9: Do you agree with the proposed transition period? If not, please provide an alternative approach and supporting evidence to justify your response.

Ecovantage proposes to extend the date from 31 October 2018 for Commercial Lighting Energy Saving Formula to 1 January 2019. This will create more transparency and will help ACPs to communicate the change to all scheme participants. Considering the compliance burden of the rule change on ACPs, Ecovantage believes that it will be easier to separate different compliance regimes by vintages to streamline the process.

Question 10: Do you consider that the proposed Asset Lifetime values should be rounded to the nearest year, or that that the proposal for portions of years is more appropriate?

No comment

Question 11: Do you agree that a Maximum NLP cap should be applied to all types of HID highbay lamps, or do you think it should only be applied to specific technology types of highbay lamps? Please provide supporting evidence to justify your response.

Ecovantage strongly disagree with the proposed changes to apply a maximum NLP cap to HID highbay lamps. After consulting with industry experts, customers and lighting suppliers Ecovantage feels that businesses that still want to upgrade their lights would be heavily penalised with the introduction of max NLP cap.

The uptake of LED lighting upgrades has now moved to more specialised higher wattage applications due to more advanced LED technology. As an example, we experience uptake of LED upgrades across sectors such as: Mining, Production Halls, Sporting Stadiums, Steel and Metal Processing, Heavy Manufacturing, Cotton Gins, etc.

Based on the above Ecovantage suggests that additional compliance check is made compulsory such as additional geotagged photos on the application of HIS Highbay lamps with wattages more than 400W.

Question 12: Do you have any comments on the proposed maximum NLP cap?

Responded in question 11.

Question 13: Do you agree with the inclusion of a sub-clause for Maintained Emergency Lighting? If not, please provide an alternative approach and supporting evidence to justify your response.

Ecovantage strongly agree with the proposed changes.

Question 14: Do you agree with including a “built in” category for mercury vapour and metal halide lamps with integrated ballasts? If not, please provide an alternative approach and supporting evidence to justify your response.

Ecovantage strongly agree with the proposed changes.

Question 15: Do you agree with introducing standalone, simplified equations to the public lighting sub-method? If not, please provide an alternative approach and supporting evidence to justify your response.

Ecovantage strongly agree with the proposed changes.

Ecovantage does not have any specific comment on questions 16-25.

Question 26: Do you have any interest in becoming accredited to undertake pool pump replacements using the HEER method? Why /why not?

Yes, Ecovantage is currently developing a residential lighting upgrade roll out and will include other technologies such as pool pumps in the second roll out.

Kind Regards

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