

# Energy Savings Scheme

AGL Response





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**Question 1:** Do you agree with the proposal to preserve preceding transitional arrangements within the Rule?

AGL believes that the 6 months' transitional period should be sufficient from an AP perspective. However, depending on the changes, it may be too short for lighting suppliers and manufacturers.

**Questions 2:** Do you agree with the intention to collect additional customer data, including NMI and DPI?

Do not agree or disagree.

**Questions 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?

Yes, as this will ensure consistency across the energy efficiency programs, and help protect the integrity of the scheme by ensuring that only quality products are installed.

**Questions 4:** Do you agree with the proposed changes to the Maximum Time Period for Forward Creation when using the default decay factors?

No comment.

**Questions 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?

Yes.

**Questions 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?

Yes.

**Questions 7:** Do you agree with the proposal to update the SONA Equipment Electricity Savings tables?

No comment.

**Questions 8:** Do you agree with the proposed Asset Lifetime values?

No comment.

**Questions 9:** Do you agree with the proposed transition period?

No comment.

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

No comment.

**Questions 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?

No. Limiting the existing lights Lamp Circuit Power (LCP) to 450W means that replacing a 1,000W highbay/flood will generate fewer ESC's than replacing a smaller 450W highbay / flood.

Given the focus on compliance, AGL fears that this change could result in companies actively putting in lights that will not meet the minimum AS1680 Lux requirements for the area installed, be of lower light output than would have been installed under the current scheme rules and ultimately result in a poor-quality outcome and lower level of customer satisfaction.

It could also dis-incentivise larger energy savings if a customer has limited capital to spend, as the higher-powered LEDs are still expensive, coupled with the fact that the number of energy savings certificates created using the example above drops by nearly 80% (45 ES's created under the current rule, 10 created under the new rule, 1000W highbay going to 240W LED replacement). Reference: Table A9.2 on page 66-67 shows the proposed change.

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

AGL is not in favour of this. See comments above.

**Questions 13:** Do you agree with the inclusion of a sub-clause for Maintained Emergency Lighting?

No comment.

**Questions 14:** Do you agree with including a "built in" category for mercury vapour and metal halide lamps with integrated ballasts?

Yes.

**Questions 15:** Do you agree with introducing standalone, simplified equations to the public lighting sub-method?

No comment.

**Questions 16:** Do you agree with allowing BCA Class 3 buildings to become eligible sites under the HEER and ROOA sub-method?

No comment

**Questions 17:** Is the U value of the windows a better indicator of efficiency than the Window Energy Rating Scheme (WERS) star rating?

No comment

**Questions 18:** Is the warranty period a good indicator of the lifetime of the product?

Yes. Length of warranty is a good indicator of quality and how certain a company is that their product will last.

AGL would like to see a focus on the quality and legitimacy of warranty, meaning that lights that have a longer warranty be prioritised over shorter warranties, all of which being verified NATA warranties regulated by IPART/ESS. This would drive out low cost-high failure lights from the market so that the end user is getting incentivised to use products that will last the savings term that is used to calculate rebates.

In line with this approach, we also believe that all the LED luminaire components should be considered, to ensure that they are capable of lasting for the 10-year abatement term. This could include publishing product lifetimes (including driver lifetimes), and the compatibility between LED chip modules and optimum drive currents, i.e. making sure that the driver is compatible with the type of LED array (constant current or voltage supply).

AGL also recommends that the formula is adjusted to include how well a lighting upgrade stacks up financially, as this is almost always the key driver for change, rather than focusing on the likelihood of replacement due to end-of-life of the existing fixtures.

**Questions 18:** Is the ten-year lifetime for fixed chimney dampers reasonable?

No comment.

**Question 20:** What evidence could be used to show the requirement that the installed End-User Equipment must allow the egress of air when the exhaust fan is in operation?

No comment

**Question 21:** Is it reasonable to consider the replacement of an existing exhaust fan with a new self-sealing exhaust fan as a high-cost activity to be added into Schedule D, as opposed to a low-cost activity which would be added in Schedule E?

No comment.

**Question 22:** Can the requirement that the window or door must not face south (between 135 degrees and 225 degrees of true north) be easily evidenced?

No comment

**Question 23:** Is the requirement to hold a NSW White Card an appropriate measure to ensure safety for working at height?

Yes.

**Question 24:** Should deemed savings factors for external blinds that are operated manually, rather than automated, be discounted to account for the risk that user behaviour is not as assumed in the modelling?

No comment.

**Question 25:** Please provide any comment on the proposed table of BCA Climate Zones by postcode.

No comment.

**Question 26:** Do you have any interest in becoming accredited to undertake pool pump replacements using the HEER method?

No.

**Question 27:** Regarding evidence requirements, how can we ensure a pool pump was installed prior to replacement?

No comment.

**Question 28:** Are the savings factors representative of the average efficiency improvements achieved by an efficient pool pump? If not, please provide supporting evidence to justify your case.

No comment.



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**Question 29:** Do you have any interest in a new activity for ventilators under the ESS?

No.

**Question 30:** Do you agree with the Eligibility, Equipment and Implementation requirements proposed for ventilators in Activity Definitions D13 and D14 of the draft ESS Rule?

No comment.

**Question 31:** Do you agree with ensuring only new boilers or water heaters can be installed under Activity Definitions F8 and F9?

No comment.