



Sydney Trains

ABN: 38 284 779 682

PO Box K349 Haymarket NSW 1238

Tel: (02) 8922 4046 Fax: (02) 8922 4138

www.sydneytrains.nsw.gov.au

Our Ref: DSYD2015/142352

Manager Energy Projects
Operations and Programs Branch
NSW Department of Industry – Division of Resources and Energy

03 December 2015

Dear Sir/Madam

Submission on the proposed pausing of the Sampling methodology

Further to the announcement that the Sampling methodology would be “paused” as a methodology until October 2016, we write to request clarification of the treatment of our nominated Accredited Certificate Providers’ Accreditation.

The Sampling method was identified in the Energy Saving Scheme (Amendment no 2) Rule 2014 as an eligible way to calculate Energy Savings using an Acceptable energy model under Clause 7A.1 c) and 7A.2 iii).

Our nominated ACP, National Carbon Bank of Australia (NCBA), was successfully Accredited by the Scheme Administrator on 29th June 2015 for Electric Railcar Lighting Upgrades using Energy Models established using a Sampling Method.

Work has almost completed to upgrade 440 Railcars and collection of evidence and baseline and upgrade modelling is well underway. Significant time to go over the modelling and evidence collection has been invested. PAIM+V restrictions on calculating savings, has to date, contributed to the extended time taken to complete this modelling.


Sydney Trains seeks confirmation that transition arrangements will be provided specifically in the regulations or specifically in the application of the scheme requirements, to ensure this accreditation will be unaffected by the proposed “pause” in the sampling sub method. Further, Sydney Trains seeks confirmation that the adjustments proposed to the minimum statistical requirements in PAIM+V will apply to this implementation.

Sydney Trains additionally requests that the rule change specifically allows spot measurements of power to estimate energy consumption where no regression is required.

If you would like to discuss this matter further please contact Shane Rosskelly, Environmental Specialist, on telephone 02 8922 4138.

Thank you for your consideration.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Peter Bragg', written over the closing 'Yours sincerely,'.

Peter Bragg
Group Manager Environment
Safety, Environment, Quality & Risk
Sydney Trains