

NSW Department of Planning, Industry and Environment – ESS 2018-19 Rule Change

Energy Savings Scheme Consultation Paper

National Carbon Bank of Australia (NCBA) would like to formally submit the following responses and feedback with regards to the 2018-19 ESS Rule change consultation paper. Unless otherwise explicitly stated below, NCBA agrees with the current proposal;

Question 18. NCBA welcomes the proposed changes to the Space Type and BCA Classification that both address the inconsistencies within the Rule to date as well as harmonise with the VEU specifications. NCBA believes these changes will ensure consistency in the application or various space type of BCA classifications to end-users, reducing the complexity centred on spaces that involve an element of storage.

In addition to the proposed changes, NCBA recommends that the corresponding Building/Space Group from Table A10.2 of the Rule for 'Maintained Emergency Lighting' (now known as 'Un-Switched Maintained Emergency Luminaire') be amended from Class A (Others) to instead be 'See Table A10.3'. The intention of this amendment would be to classify the asset lifetime of maintained emergency luminaires on the BCA classification of the surrounding space, rather than applying a flat 7.3 years. This would better reflect the energy savings associated with these upgrades, as currently more ESCs are generated for non-emergency fittings in an undercover carpark than emergency fittings, for reference please refer to the table below;

	ESCs – Maintained Emergency Luminaires	ESCs – Non-maintained Luminaires
Class 5	381	136
Class 7b	381	224
Class 8 (Other than Division C)	381	134
Class 8 (Division C)	381	359
Undercover Carpark	381	503

Based on the replacement of 100x Twin 36w T8 Fittings (B2 Ballast) with 100x 30w LEDs

Question 19. NCBA believes the proposed 3-month transition arrangement will be sufficient in order to be 'business-ready' for these changes.

Question 20. NCBA supports the strengthening of the definition of maintained emergency lighting to be 'un-switched'. However, as proposed in Question 18, we believe that alongside these changes should be the amendment of the Building/Space Group classification to better reflect the energy savings, especially as the constraints on what is defined as an emergency luminaire has risen.

Question 23. NCBA welcomes the addition of Activity Definition E13 and shares DPIE's belief that it will improve lighting outcomes across the state. However, NCBA recommends that the Light Output of new End-User Equipment is harmonised with the values prescribed under Activity Definition E5.

This is particularly the case with 4 ft (2x 1200mm) lamps, with 3000lm prescribed under E5, however 3500lm prescribed under E13. Harmonising the prescribed values will reduce complexity and administration costs.

Question 24. NCBA is likely to utilise the proposed methodology, though not as frequently as E5 or potentially E1. This is a result of the likelihood of encountering these replacements in the industry.

Question 25 & 26. NCBA believes the changes proposed to the Home Energy Efficiency Retrofits (HEER) would present a variety of issues in claiming HEER upgrades. NCBA proposes that definition of Implementation Date should remain constant, in order to harmonise HEER and CLF methodologies. There is already a great deal of complexity associated with the Energy Savings Scheme and changing the definition of the Implementation Date will only serve to increase this, especially as many agents operate across both methodologies. In addition, the change in definition to the Implementation Date is also likely to affect the conditions of Accredited Certificate Providers (ACPs) Accreditation Notice, specifically Item 5 that requires ACPs to report by the end of each calendar month information (specified in clause 6.8 of the Rule) for all implementations of the RESA that occurred in the previous month. The change in definition of the implementation date may result in delayed adherence to this item, for example if an Implementation began on the 10th January 2020 and was completed in March 2020, the Implementation Date will be 10 January 2020 but the ACP may not be provided with all necessary information for the upgrade until March.

Question 27 & 28. NCBA agrees with the proposed change to combine the transformer types for E1, especially as we have received feedback from clients stating that it is extremely difficult to quote projects containing these replacements unless a fitting is physically removed at the time of assessment, which is rarely the case. These changes will reduce complexity and revisions of quotations for our clients, thus administrative costs.

Please take all these responses and concerns into consideration, and do contact myself at adam@ncba.net.au or Nick Butler at nick.b@ncba.net.au if you would like NCBA to comment further on any of the responses written above.

Kind Regards,

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