

NSW Energy Savings Scheme (ESS) 2018-19 Rule Change

Ecovantage welcomes the opportunity to comment on the NSW Energy Savings Scheme Consultation on 2018-19 Rule Change. Ecovantage provides the following responses to questions posed in the consultation paper.

2.1 Commencement date, and transitional arrangements

Question 1: Do you agree with the proposed transitional arrangement? Please provide reasoning supporting your response.

Ecovantage supports the proposed changes, especially the transitional arrangement for the registration of the ESCs in accordance with the previous rule. However, currently the proposed arrangement is not clear on whether the implementations before commencement date must be calculated under the old rule or the new rule (optional?) if certificates are created after the commencement date?

• Question 2: Is this approximate three-month timeframe sufficient for preparing your business to be ready to comply with the new ESS rule? If not, what timeframe do you deem necessary?

Ecovantage believes that three-month time frame is sufficient for making the business ready.

• Question 3: Can you foresee any particular part of the new ESS Rule for which it will be difficult to get 'business-ready' within the proposed timeframe?

Ecovantage believes that it depends on the type of industry. The quoting and approval process might take much longer than the proposed three-month, i.e. large industrial customers, councils and strata buildings. Therefore, the proposed timeframe may have a financial impact on potential projects that may not be approved before the transitional arrangements. Making the adoption of the rule optional would address this issue.

5.2 Updates to the Commercial Lighting Energy Savings Formula

Question 18: Do you agree with the proposed amendments to the space type and space type classifications? Please provide reasoning supporting your response.

Ecovantage supports the following proposed changes:

1. The wholesale storage type,
2. The Introduction of a new space type for gyms and
3. Changes to the annual operating hours of restaurants and cafes operating in museums.

However, Ecovantage strongly believes that the newly proposed space type for stairs including fire stairs in residential buildings is not an accurate reflection of the operating hours within that space. Ecovantage has completed hundreds of upgrades in residential and commercial strata buildings and found that nine out of ten buildings would have all lights in fire stairs, both standard and emergency fittings, operating 24/7 regardless of the BCA class of the main building. Ecovantage can provide further supporting evidence if required.

- Question 19: Given the scope of these changes, is it your understanding that the three-month transitional period for being 'business-ready' is sufficient?

Ecovantage believes that the proposed changes to the space type of the stairs and lift cars have an impact on Strata Buildings which, due to the nature and complexity of the decision-making process. It would usually take longer than three months to review and accept the provided quote for the lighting upgrade.

- Question 20: Do you agree with the proposed change to the definition of maintained emergency lighting? Please provide reasoning supporting your response.

Support

- Question 21: Does the proposed change provide for all relevant qualified contractors to undertake the lighting upgrade works? Please provide reasoning supporting your response.

Support

5.3 Updates to the Home Energy Efficiency Retrofit method

- Question 22: Does the proposed change provide for all relevant qualified contractors to undertake the lighting upgrade works? Please provide reasoning supporting your response.

No comments

- Question 23: Do you have any comments on proposed Activity Definition E13?

We would expect and propose that the requirements (i.e. lumen output) for the new activity E13 would be the same as activity E5 given the similar nature of these (T5 vs T8).

Further to this, there are other considerations which increase the need for the activities to have the same requirements-

-Product Availability

All involved lighting manufacturers have designed and stocked products to fit the requirements of activity E5. Currently there are no approved products which would meet the criteria of E13, and it is unlikely that manufacturers would design a specific product for this activity given the associated costs, lower demand in the market for T5 replacements, and the lower level of deemed Electricity Savings in MWh leading to a necessity for a higher customer contribution.

-Reduced Electricity Savings for End Users

The scheme is designed with Electricity Savings in mind. Requiring the installation of a higher Wattage product than necessary reduces the total amount of Electricity Savings possible.

-Brightness of Lights

Customer feedback from activity E5 has overwhelmingly been positive with the level of brightness of the 25W 3000lm LEDs. The only negative feedback has ever been that the lights are too bright. Requiring an even higher lumen output would lead to undesirable outcomes for end-users

- Question 24: How likely are you to use the proposed Activity Definition E13? Why/why not?

Ecovantage welcomes the proposed inclusion of Activity Definition E13 and will be incorporating it in our systems and activities. However, this would only be viable if the recommendations provided on questions 23 are implemented.

• Question 25: Do you agree with the proposed definition as opposed to the current definition of the Implementation Date for HEER activities? Please provide reasoning supporting your response.

Ecovantage strongly supports the proposed definition to the implementation date as the current definition for the implementation date is not clear and adds extra administration burden.

• Question 26: Do you anticipate that this change would present any difficulties with being nominated and generating ESCs for a particular work program?

No, there will be no difficulties adapting the new definition

• Question 27: Do you agree with combining lamp only magnetic and electronic transformers into a single category? Please provide reasoning supporting your response.

We welcome the change to activity E1 in combining the factors for the electronic and magnetic transformers. Further to this, we would propose that the 240V Self Ballasted lamp category also be combined with the Electronic and Magnetic Transformers to have just one calculation category for E1 for each Wattage level.

From our data, 240V self-ballasted lamps make up less than 2% of the total for activity E1. It is, therefore, unnecessary to have its own calculation given the extra layers of complexity and compliance it adds for such a low volume.

We would propose that with this further combination of the categories, that the deemed MWh increase by a further .01MWh.

Suggestion:

Ecovantage believes that the current calculations for LED Lamp only as compared to LED Lamp and Driver or LED Luminaire Recessed are too generous and do not take into account many factors which ultimately reduce the energy savings associated with undertaking Lamp only activities. Performing lamp only upgrades without removing the existing transformer will eventually lead to compatibility issues and a reduced number of hours of effectiveness. Removing the transformer and replacing the whole fitting will lead to a much longer lifetime and ultimately more significant energy savings for the end user and the scheme. Furthermore, replacing the whole fitting leads to better outcomes in regards to insulation and preventing heat transfer between living and roof spaces. The transformers themselves can also emit quite a bit of heat and can cause other electrical issues. We would suggest increasing the deemed energy savings associated with undertaking the Lamp and Driver activity as opposed to lamp only to better reflect the lifetime effectiveness of replacing the whole fitting.

• Question 28: Would this change result in reduced administrative costs for your business?

No.

For the questions not covered in our response, Ecovantage supports the proposed amendments as per the consultation paper.

Kind Regards

Mahsa Sistani
NSW Operations and Compliance Manager