

January 6, 2017

To whom it may concern,

**RE: Energy Makeovers' response to the draft ESS Rule 2016-17 and consultation paper,
additional comment**

Further to clause 2.4 our letter December 21, 2016 we make these additional recommendations.

ADDITIONAL CHANGES TO THE ESS RULE WE BELIEVE SHOULD BE MADE

Pool Pump Replacement Activity D5

1. Pool pump warranty

Point 3 of Equipment Requirements in Activity Definition D5 states that: "The new End-User Equipment must have a warranty of at least 5 years."

This requirement would, to our knowledge, have the effect of making ineligible all major brands of pool pumps sold in Australia. Pool pumps sold in Australia are typically covered by a 1 to 3 years warranty.

Unlike many other appliances eligible under the ESS (e.g. lighting appliances), it is commonplace to repair a faulty pool pump. Should an Original Energy Saver cause to have repaired their faulty pool pump rather than having it replaced, then the energy savings would continue to accrue up to and possibly beyond the "lifetime" of 12 years used in the deemed electricity savings calculation; irrespective of the warranty term that may apply.

Therefore, we recommend that point 2 be:

- removed entirely; or
- changed to "The new End-User Equipment must have a written warranty for a period no less than the minimum statutory requirement for electrical appliances."

2. Refurbished pool pumps

There is a practice of pool shops refurbishing and reselling old pool pumps.

Therefore, we recommend that a clause be added to D5's Equipment Requirements stating that the new pool pump must be "new" at the time of installation, that it must not have been previously sold in whole or in part, that it must not been a repaired and/or or refurbished pool pump.

We would welcome a request to provide further information about anything provided above and/or to participate in any workshop discussions pertaining to the consultation process vis-à-vis the proposed changes to the ESS Rule.

Please contact me should you require any further information about our response.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Wilson', is written over a light grey circular background.

Mark Wilson
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