



28 February, 2013

Energy Saver Incentive Program  
Department of Primary Industries  
GPO Box 4440  
Melbourne VIC 3001  
Distribution via email: [energysaverincentive@dpi.gov.au](mailto:energysaverincentive@dpi.gov.au)

Dear Energy Saver Incentive Scheme architects,

**Re: Request for maximum operating hours extension - VEET Scheme commercial lighting upgrades**

IT has come to our attention that the current annual operating maximum setting for the creation of commercial lighting upgrade project VEET certificates is 3,000 hours as prescribed in the Victorian Energy Efficiency Target Regulations of 2008 -Schedule 34.

This is a serious oversight in the design of the scheme, which we request be updated following the addition of commercial lighting upgrade activities in mid 2012.

As an Australian specialist lighting manufacturer and supplier, the majority of our commercial lighting upgrades are in areas where 24/7 emergency lighting is mandatory through Building Code regulations to enable safe egress paths (fire stairs, car parks, back of house service corridors). The annual operating hours of lighting in these areas is 8736.

The current 3,000 hour maximum for the VEEET Scheme is insufficient to truly reflect the operational realities of commercial lighting & is failing to incentivise action to achieve the full potential of energy saving commercial lighting upgrades.

The NSW Energy Savings Scheme has adopted an 8736 hour maximum of operating hours & is successfully delivering the correct volume of certificates for actual energy savings / GHG emissions reduced.

We trust that you will commit the resources to change the regulations to redress this issue with expedience.

I look forward to your response.

A handwritten signature in black ink, appearing to read "Steve Cahill".

Steve Cahill  
General Manager



July 8, 2013

David Blowers  
Energy Sector Development Division  
Department of State Development, Business and Innovation

GPO Box 4440  
MELBOURNE VIC 3001

Distribution via email: [ESI.Review@dpi.vic.gov.au](mailto:ESI.Review@dpi.vic.gov.au)

### **Re: ESI Review Submission**

We strongly support the Victorian Energy Efficiency Target and believe that this scheme is critical to help households and businesses deal with rising energy prices. To reach its full potential however, we believe that a number of the rules need to be adjusted.

#### **1 Background**

Enlighten Australia is an Australian LED lighting product manufacturer and supplier in residential, commercial & industrial markets. Our Chamaeleon Multi Function LED Light was submitted for approval by us, the OEM, and approved for use in S34 Commercial lighting upgrades under the ESI Scheme in May 2013. (Approval ID #994)

As an Energy Efficiency Council member, we support the recommendations of the collective submission of Council members and have outlined further details relating specifically to commercial lighting upgrade activities & our experiences.

#### **2 Product approval history**

Our initial experience was very unsatisfactory with over 12 months of limbo (April 2012 -13) without result . An AP submitted the Chamaeleon light ( approved for use by IPART under the ESS scheme Nov 2011) and was in regular contact with the approvals team between April 2012 & February 2013 without reply or request for further information. Our application was lost/dropped off the system in your move to the online registry in early 2013.

In the end, we took up the opportunity to apply directly for product approval via the PC8 code, which was a more streamlined process, with an 8 week turn around.

We support the capacity for product manufacturers to apply directly for product approval & make the product available for all APs. A sensible option to avoid duplication of documentation submission per ACP, as is the case in NSW. We would argue to keep this functionality.

Improvements to lighting controls discount factors in calculation of certificates produced.

### 3 Performance of the ESI to date

#### 3.1 Barriers to the participation of specific groups in the ESI

##### *Current limit on annual operating hours for commercial lighting upgrades*

Given the ESI scheme's history as a residential scheme, the enabling legislation (VEET Regulations 2008 – Schedule 34) has prescribed a maximum annual limit of annual 3,000 operating hours, which equates to 8.25 hours per day. This limit may have been reasonable in a residential context, however it is woefully inadequate to reflect the operational realities in commercial & industrial lighting.

24/7 emergency lighting is mandated through Australian Building Code requirements for areas of safe egress (fire stairs, car parks, lift lobbies, back of house service corridors) in commercial & industrial sectors. The annual operating hours for lighting in these areas is 8736 hours, close to 3 times the current ESI limit.

The flow on effect of the current inadequate operating hour limit is the inability to translate the full energy savings of commercial lighting upgrades into VEET certificates. ) For the last 30-40 years, lighting in back of house areas has been hopelessly inefficient fluorescent tube lighting with no controls. We have an Australian design patented & award winning lighting solution specifically for these areas. In order to incentivise building owners & managers to even consider back of house lighting upgrades in areas of extended operating hours, we ask for these areas to be granted the same recognition of energy savings potential (8736 hours) as is currently offered to front of house areas (300 hours).

The current VEET rules, which are based on general applications, seriously disadvantage our product. In contrast, the NSW Energy Saving Scheme allows for the maximum operation of 8736 hours, which has resulted in greater business investment in our product in NSW compared with Victoria.

The operating hour limit is a barrier to all our Victorian customers, from residential strata properties to commercial property owners & managers. A number of national clients have expressed frustration with the VEET commercial lighting upgrade product approval delays and the current cap on operating hours, resulting in postponement of their decisions to upgrade the emergency lighting of their Victorian assets.

#### **Recommendation**

##### *Extension of maximum operating hours for commercial lighting upgrades to 8736 hours*

### 3.2 Lighting Control Factors or extended operating hours (Project based methodology)

#### **Chamaeleon Product Overview**

The Chamaeleon light is two lighting circuits inside one fitting. One light circuit operates continuously providing low levels of background light and is referred to as the standby light. This light circuit consumes between 7 and 9 watts depending on whether it is the standard or emergency version.

As a person enters the space, the microwave sensor detects this presence and the main lighting circuit switches to provide higher lighting levels for a period of 10-15 seconds. This 2nd light varies in lumen output depending upon the specific requirements of the lit space, with energy consumption between 26 and 32 watts.

Effectively, this means that the Chamaeleon light has 2 lamp circuit power (LCP) values.

The lighting circuits are LED so the time between commencement of occupancy and full light mode is instantaneous. Combining the two lighting circuits within the Chamaeleon delivers significant energy savings in low occupancy areas.

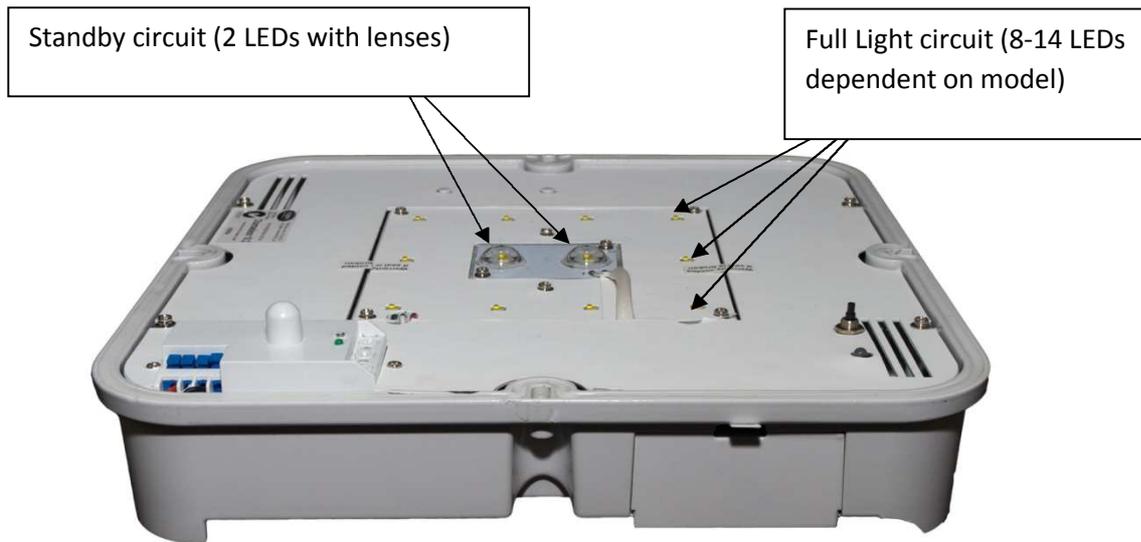


Fig 1 – Chamaeleon multi function light with diffuser removed

The current Chamaeleon product approval only takes into account the full light output circuit LCP range (28-32 watts) as there is only capacity to insert a single LCP. The ESI lighting controls multiplier maximum allowed for s34 commercial lighting upgrades is 30%.

A 2013 review by IPART of the treatment of Extended Operating Hours (EOH) ESS Notice 02/2013 - 14 March 2013 ruled below:

#### ***Using control multipliers***

*To ensure energy savings claims are not duplicated, the effect of an installed control system can be accounted for either:*

*☐ by using a control multiplier from the Rule, or*

*☐ by using different post installation hours supported by logged data that has been approved by the Scheme Administrator before the creation of ESCs.*

The result of this ruling is the ability for ACPs in NSW to now have a Chamaeleon minimum power LCP range approved as well as a maximum power LCP range. To submit a project based control system calculation, supported by data logging, the ACP is able accurately present the percentage of time the light is on standby and full power.

In fire stair areas, data logging conducted by Enlighten Australia for installation customers has consistently revealed occupancy of under 5%.

The difference in the volume of ESCs able to be created by commercial lighting upgrade RESA based on actual lodged data over the standard controls multiplier is stark – between double and triple.

### **Recommendation**

*Introduce temporary evidenced based data submission for the effect of an installed control system with a view to changing the maximum controls discount multiplier*

I am happy to discuss any of the points raised above in further detail or provide project data logging evidence, should you require further clarification.

Sincerely,



Steve Cahill  
**CEO**