

Submission by Wattly. June-2018

Review of Victorian Energy Efficiency Target Regulations

1. Do you agree with moving the technical requirements from the Victorian Energy Efficiency Regulations 2008 to the Victorian Energy Upgrades Specifications 2018, and the process by which that document can be updated by the department?

- Yes, this will help DELWP react more dynamically to changing technologies and market situations. BUT please be aware that businesses need ample notice of changes (ie 6-12 months to factor in changes from when they are announced to when they are implemented)..

2. Do you agree with introducing flexibility into the proposed Regulations so that emerging technologies and products can be quickly integrated into the Victorian Energy Upgrades program?

- Yes,

3. Do you agree with providing all activities in the proposed Regulations with a 'fresh start' in terms of the number of times an activity can occur at a premises?

- Yes

4. Do you agree with the transitional arrangements included in Part 4 of the proposed Regulations?

- No comment

5. Do you agree with increasing shortfall penalty rate from \$46.72 to \$50?

- Yes

6. Do you agree with removing the requirement for certain products to be listed on the product register kept by the Essential Services Commission?

- Yes, Wattly would continue to encourage DELWP to find existing registers for product approvals with the caveat that the product approval standards for free products needs to be very high.
- Over the past six years, Wattly has seen that where free activities that are performed the customers' longer-term outcomes are not considered by either the customer or the installation business. Standby Power Controllers, Chimney Balloons, and some forms of Lighting upgrade have not had consumer engagement, and hence have not resulted in long-term abatement.

7. Do you agree with the introduction of the new activity for high efficiency fan motors for ducted or partition fans in ventilation systems (proposed Part 33)?

- Yes, BUT the abatement factors are unlikely to drive additional uptake. Where the baseline considers only the MEPS figures, there will remain in place the majority of the working fans with not enough incentive to drive addition uptake. !

8. Do you agree with the introduction of the new activity for gas-fired steam boilers (proposed Part 37)?

- Yes, but again we'd question whether or not the awarded abatement will be adequate to drive any uptake.

9. Do you agree with the introduction of the activity for gas-fired hot water boilers or gas-fired water heaters (proposed Part 38)?
- Yes (as above)
10. Do you agree with the introduction of the activity for gas/air ratio controls (proposed Part 39)?
- Yes, but we have not reviewed in detail.
11. Do you agree with the introduction of the activity for gas-fired burners (proposed Part 40)?
- Yes, but we have not reviewed in detail.
12. Do you agree with the introduction of the activity for economizers (proposed Part 41)?
- Yes, but we have not reviewed in detail.
13. Do you agree with the removal of activities involving solar retrofits for water heaters (current Schedule 2 and 4)?
- Yes
14. Do you agree with the removal of the activity involving destroying pre-1996 refrigerators and freezers (current Schedule 19)?
- Yes
15. Do you agree with the removal of the activity involving standby power controllers (current Schedule 29)?
- Yes, Wattly does not support easily removed equipment within the program.
16. Do you agree with the removal of the activity involving low flow trigger nozzles (current Schedule 35)?
- No comment
17. Do you agree with removal of flue/chimney balloons as eligible products for installation (current Schedule 15)?
- Yes, Wattly does not support easily removed equipment within the program.
18. Do you agree with removal of compact fluorescent lamps as eligible products for installation (current Schedule 21)?
- Yes, but we'd like to see Sch21X which is a baseline CFL light replaced with an LED light..
19. Do you agree with removal of gas clothes dryers as eligible products for installation (current Schedule 25)?
- Yes
20. Do you agree with the removal of T5 adaptors as eligible products for installation and decommissioning (current Schedule 34)?
- Yes, Wattly supports the removal of T5 adapters as a new product.
 - No, Wattly does not support the removal of T5 adapters for decommissioning (baseline technology), there are a number of T5 adapter installations that would be better suited to moving to and LED fitting

21. Do you agree with the proposed changes for water heating activities? In particular, do you have views on the requirement for heat pump water heaters to be modelled to heat pump zone 5 (current Schedule 1, proposed Part 1)?

- Wattly views water heating upgrades as an activity where there is a very high degree of certainty that energy savings are accurate and will persist for long period. For these, the abatement award for water heating should be commensurately higher than activities which may have less permanence or be delivered for free.
- Wattly understands that a lifetime of 12 years has been factored into the calculations and proposes this be increased to 15 years to reflect the high quality and long-lived abatement of hot water services..

22. Do you agree with the proposed changes for space heating and cooling activities? In particular, the changes for room heating (current Schedule 9 & 10, proposed Part 9 & 10) and replacing a fixed electric room heater with a high efficiency room heater?

- Yes

23. Do you agree with the proposed eligibility changes for low flow shower roses (current Schedule 17, proposed Part 17)? In particular, decreasing the maximum flow rate allowed to 7.5L/min?

- No, Ecovantage believes this proposal may create a barrier for lower income household uptake of this activity. We request that the Victorian Government seek further consultation with the Energy Efficiency Council and the Energy Efficiency Certificate Creators Association on this matter.

24. Do you agree with the changes to incandescent lighting (current Schedule 21, proposed Part 21), including requiring a 60-degree beam angle for downlights installed in residential premises?

- No, this will remove a component of the market, and may result in poor outcomes for consumers..

25. Do you agree with the proposed splitting of non-residential lighting activities (current Schedule 34) into building based (proposed Part 34), non-building based (proposed Part 35) and public lighting (proposed Part 27)?

- Yes, and with regards to NBBL and Public Lighting, Wattly supports the plans to allow variations from AS1158. Our experience is that very few councils confirm to AS 1158 for street lighting. The requirement to confirm to AS1158 excludes a large number of NBBL installations as well, where the existing lighting does not meet AS1158.
-
- Wattly supports the requirement that the upgrade luminaire output should be equal or higher than the existing luminaires under NBBL and Public Lighting.

26. Do you agree with the proposed changes to asset lifetimes, revised lamp circuit power categories, and new space types for non-residential lighting activities (current Schedule 34)?

- Yes, Ecovantage supports this proposal

27. If you have a separate written submission, please upload it here.



Please indicate how you would like your submission to be used. For more information, please read the Department's Privacy Collection Statement available below.

Yes, I consent to the Department publishing my submission on its or a related Victorian Government website.

No, In relation to such publication, I request that my submission be de-identified. No need to de-identified Wattly.