

1 August 2017

Re: Consultation Paper June 2017 - ACT Energy Efficiency Improvement Scheme (EEIS): proposed updates to residential energy saving activities

To whom it may concern,

Thank you for the opportunity to provide input on the proposed updates to ACT Energy Efficiency Improvement Scheme (EEIS) residential energy saving activities.

The Energy Efficiency Council (EEC) is the peak body for energy efficiency, demand management and cogeneration in Australia. The Council is a not-for-profit membership association, and its goal is to make sensible, cost-effective energy management measures standard practice across the Australian economy. Our members include independent experts, energy efficiency providers and various levels of government.

The EEC is generally supportive of the proposed new activities and updates to existing activities. We particularly welcome the EEIS approach to reviewing other state based certificate schemes and efforts to harmonise the new activities with existing certificate schemes.

We believe that the new insulation activities proposed by the EEIS are in partial harmonisation with other schemes and applying a strong focus on the training and licensing requirements of Installers will reduce the risk of non-compliant/safety fault installations under the scheme. However, we recommend further steps are taken by the EEIS to harmonise with other scheme's activities already in operation to reduce the occurrence of minor divergences with compliance and regulations. We do support the EEIS approach to the removal of minimum m² / % based entry to this activity.

While the proposed new activities and updates to existing activities have the potential to help ACT energy customers save energy, Council believes they do not represent the areas of greatest energy, cost and greenhouse gas savings. We recommended that as a guiding principle, priority should be given to the adoption of activities that unlock these areas of greatest savings such as commercial building heating and cooling.

The EEIS must also provide equal opportunity for energy and cost savings to residential and commercial customers. The proposed new activities and updates to existing activities do not reflect this principle and we encourage further action to address the current imbalance in available activities between commercial and residential ACT energy customers.

It is important too that the value achieved through these and any future activities is not lost through unnecessary implementation and compliance costs. For example, a high uptake rate is not anticipated for exhaust fan activities and forecast abatement is low. The cost to the EEIS in introducing these new activities to the scheme such as consultation, training and compliance regulations, could result in unnecessary costs for very little uptake.

Please contact me on shauna.coffey@eec.org.au should you require further information on any of the issues raised in this submission.

Yours sincerely

A handwritten signature in blue ink on a light-colored background. The signature is cursive and reads "Shauna Coffey".

Shauna Coffey

Head of Projects

Energy Efficiency Council