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## SA REPS - submission.

Thankyou for seeking input to the design of REPS and the opportunity to make a submission. Ecovantage has worked in State Government schemes in NSW, Vic and SA for over a decade now and recognise the benefits in reducing cost and improving Australia's poor energy productivity.

In general we believe the move to include demand response and demand management capabilities within an energy efficiency scheme has the potential to drive further benefits to the SA community and will improve the resilience of the energy system as a whole.

In summary we believe that:

- Target needs to increase significantly – recommend atleast 50% increase.
- Limits on carryover should be removed or increased significantly
- REES to REPS Gj's needs to be aligned 1 to 1
- REPS should reconsider changes to Residential activities as the reduction in value for lighting in particular will remove this activity from being viable.
- The technical light requirements for the A bulb are not practical as the lights that meet the levels are not yet generally available. Remove these requirements or post date them.
- REPS to adopt REES rules and values for Residential activities for 2021
- REPS should consider adopting NSW HEER rules and values for residential and SME including downlights which remain a significant opportunity not supported by REES or REPS.
- Reconsider the selection of the consultants used for lighting for the next review as their assumptions (used last time and again this time) are arguable at best.
- Reduction in standby power controller value is supported and considered overdue.
- Remove requirement for 50% deeper retrofit for PG until the activity has proven practical.
- Remove \$33 co-contribution for residential – especially applied per activity.
- Reconsider the values associated with Demand Response activities as the settings will be unlikely to generate much if any activity.
- and should only introduce complex elements like time of use after a proof of concept.
- Administration of sub targets costs and should only be imposed for significant benefit – removal for 2021 for consideration during the year.
- Removal of activities needs to consider more than just lack of use. Insufficient incentive value is more likely the reason.
- Project based methodology needs detail and expansion. It also needs to be capped to 20,000 Gj's to avoid impacting the scheme too much.

Ecovantage supports the establishment of an expert steering group which would improve the capacity and capability of the DEM REPS team to consider activities and design a successful scheme.



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The benefits of constructive engagement with such organisations as ACOSS, EEC, IAG, ESIA and representatives of the retailers, SA power and so on would be great.

Thanks again for the opportunity and I look forward to the outcome.

The Ecovantage team.

Bruce Easton, George Michael and Karen Friel.