

To the Department of Energy & Mining

Feedback on proposed REPS Regulatory Framework & Activities

North Plympton, 17th of July 2020

Dear ESC Committee,

We would like to submit the following feedback as requested in the proposed REPS in June 2020

1. The addition of priority activities in residential properties under a tenancy agreement is a good addition to the priority groups
2. How can you define the low-demand periods for us to understand if it is possible to shift hot water demand from overnight to low demand periods, and secure enough hot water for the end user when implemented?
3. (10) We suggest increasing the amount of carry-forward activities from REES in 2020 to REPS in 2021 to 50% of the annual target for 2020. In the past years the retailers have banked up large amounts of activities, and as a result of the carry-forward amount from 2019 into 2020 there is no targets to fulfill to do more activities in the second half of 2020 with most retailers, unless the carry-forward amount into REPS will be increased and confirmed shortly after the closing date of this consultation.
4. (14) Can the department consider adding an option of replacing electric and gas storage heaters by electric instantaneous water heaters for commercial properties? The annual savings are substantial due to high standing losses for storage hot water systems. This would benefit the end users calculating with the average price per kWh at the moment approx. >\$300 per annum for a 25 ltr. Storage heater, increasing linear by the volume held to temperature in a tank.
5. (15) Can ESCOSA look to simplify the compliance requirement for small scale commercial lighting upgrades, as under the current regulations the amount of work involved in collecting evidence and producing the compliance documents exceeds the benefit of applying the REES credits on small scale activities.
6. (16) The severe penalties for not achieving the REES targets passed on by the energy retailers to third party contractors is a high risk for third party contractors, especially in 2020 with the COVID-19 pandemic. The penalties can create a limitation in the uptake due to the risk for any party involved. The proposed carry-forward of obligations is a far better solution, and the percentage could perhaps be as high as 25%?

Kind Regards,

Jan Antonides

CEO