

SA Demand Response Requirements for Swimming Pool Pump Controllers, Home Chargers for Electric Vehicles, Electric Storage Water Heaters and Air Conditioners

Consultation Sessions, 17 March 2021



- Dynamics of the power system have significantly changed over the last few years
- Coal-fired generation assets have withdrawn from South Australia, replaced with wind generation, rooftop PV and battery storage.
- The transition to renewable energy has presented system strength, minimum demand and peak demand issues that need to be managed
- Increased flexibility of end use on the electricity network can improve network security.

- Government of South Australia
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- Since 2009, SA's total installed rooftop solar PV capacity has grown strongly.
- More than 30% of dwellings in SA now have rooftop solar PV systems.
- High Solar PV penetration may require changes to managing distribution systems in SA.





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Source: AEMO, Minimum Operational Demands Thresholds in South Australia, May 2020

SA context - projected minimum operational demand



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Actual …... Central ….... High DER



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Range between maximum and minimum demand is widening



Annual range between minimum and maximum demand

Note: analysis excludes black system event in South Australia on 28 September 2016.

Modern Energy System



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Source: WA Energy Transformation Taskforce, Distributed Energy Resources Roadmap

PASSIVE TO ACTIVE

Modern Energy System



1600 1400 1200 SA Operational Demand (MW) 1000 800 600 400 200 0 -200 12:00:00 AM 6:00:00 AM 12:00:00 PM 6:00:00 PM 12:00:00 AM

---- 2021

---- 2020

2022

---- 2023

OPPORTUNITIES

Maximise self consumption

Tariff optimisation

Provision of network support

Participate in markets



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SA Demand Response Requirements for Pool Pump Controllers Consultation 17 March 2021

National context – DR requirements



- Energy Ministers have agreed to introduce demand response requirements for electric resistive water heaters, air conditioners, pool pump controllers and electric vehicle chargers.
- The AS/NZS 4755 framework is proposed as the technical standard to support the demand response capability requirement.
- The requirements will be introduced through the Commonwealth *Greenhouse and Energy Minimum Standards Act 2012*

DR modes in the AS/NZS 4755 framework



- DRM 0 Disconnect, if equipped with a disconnection device
- DRM 1 No load, or minimum load
- DRM 2 Restrict load to no greater than 50% of a reference value
- DRM 3 Restrict load to no greater than 75% of a reference value
- DRM 4 Commence operation or increase load
- DRM 5 No discharge of energy to grid
- DRM 6 Restrict discharge to no greater than 50% of a reference value
- DRM 7 Restrict discharge to no greater than 75% of a reference value
- DRM 8 Commence or increase discharge of energy to the grid.

National timeframe and DRMs Pool Pump Controllers

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- Pool Pump Controllers (as defined in AS/NZS 4755.3.3:2014) to comply with:
 - AS/NZS 4755.3.2:2014 or

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- AS/NZS 4755.2 (when published)
- Compliance with DRM1 from 1 July 2024
- Compliance with DRM1, DRM2 and DRM4* from 1 July 2026.

• *note – typographical error corrected from the 2019 Energy Council Decision

Background - local regulation and the GEMS program



- While GEMS IGA prefers nationally consistency in setting performance requirements
- The IGA notes that jurisdiction-specific requirements may be justified where there are significant environmental or infrastructure concerns, or to allow one jurisdiction to lead the way in accelerating the implementation of new or more stringent requirements
- In 2009 South Australia brought forward the Energy Council's national stringency requirements timetable for cooling energy efficient ratio for air conditioners. The rationale was to address the impacts of peak summer demand.

Local DR requirements for pool pump controllers Cost benefit modelling



- Demand Response Capabilities for Selected Appliances South Australia Specific Analysis, May 2020
- Options modelled:

- 1. implement DR requirements two years earlier than national timeframe
- 2. implement DR requirements two years earlier than national timeframe, and require full range of DRMs and require compliance via 4755.2 only
- 3. implement as per the national timeframe but require full range of DRMs and require compliance via 4755.2 only

Local DR requirements for pool pump controllers Cost benefit modelling



• Cost modelled (as per national DRIS):

- product designers, manufacturers (local and overseas), retailers, and suppliers;
- businesses with existing stock that may not meet the requirements;
- costs to consumers, including costs from reduced product availability and consumer choice;
- cost to the South Australian Government to administer a local requirement, including registration and compliance costs;
- costs of DR capable appliance connection(s) and activation(s); and
- costs of DR program participant servicing.
- Benefits modelled (as per national DRIS):
 - opportunities for better managing periods when export of rooftop solar PV exceeds minimum demand;
 - reducing wholesale electricity prices; and
 - improved electricity network reliability and security.

Local DR requirements Current market – pool pump controllers



Pool pump controllers not covered by GEMS

- No models currently compliant with AS/NZS 4755
- Pooled Energy offers a product with capabilities similar to DRM1, DRM2 and DRM4.
- Some models imported from the US also have DR and wifi connection capabilities.

Local DR requirements for pool pump controllers Market impacts of options

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Option 1 – Faster implementation	Option 2 – Faster implementation, full range of DRMs, 4755.2 only.	Option 3 – Current implementation full range of DRMs, 4755.2 only
Moderate risk of supplier withdrawal in South Australia.	Moderate risk of supplier withdrawal in South Australia.	Low risk of supplier withdrawal in South Australia.

Local DR requirements for pool pump controllers

• Option 3 – National timeframe, more stringency

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Assuming medium activation rates from 2019 DRIS – 33.2% by 2036

Total Saving	Increase in costs	Net Savings	BCR
\$M NPV compared	\$M NPV compared	\$M NPV compared	
\$11.3	\$4.2	\$7.0	2.7

Source: GWA, Demand Response Capabilities for Selected Appliances – South Australia Specific Analysis, May 2020, Table 22

Implementation Pathway



- Sales restriction via *Electrical Products* (Safety and Efficiency) Act 2000.
- Creates an offence for offering for sale products that do not comply with DR performance standards.
- Suppliers will need to register complying products and supporting documentation for sale in SA.
- Feedback invited on the most efficient approval mechanism.





- Pool Pump Controllers (as defined in AS/NZS 4755.3.3:2014) to comply with AS/NZS 4755.2 (when published).
- Compliance with AS/NZS 4755 DRM1, DRM2 and DRM4 from 1 July 2024.
 - i.e. current implementation schedule, greater stringency (AS/NZS 4755.2 only and DRM1,2 and 4 from 2024).





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SA Demand Response Requirements for Electric Vehicle Chargers Consultation 17 March 2021





- Energy Ministers have agreed to introduce demand response requirements for electric resistive water heaters, air conditioners, pool pump controllers and electric vehicle chargers.
- The AS/NZS 4755 framework is proposed as the technical standard to support the demand response capability requirement.
- The requirements will be introduced through the Commonwealth *Greenhouse and Energy Minimum Standards Act 2012*

DR modes in the AS/NZS 4755 framework



- DRM 0 Disconnect, if equipped with a disconnection device
- DRM 1 No load, or minimum load
- DRM 2 Restrict load to no greater than 50% of a reference value
- DRM 3 Restrict load to no greater than 75% of a reference value
- DRM 4 Commence operation or increase load
- DRM 5 No discharge of energy to grid
- DRM 6 Restrict discharge to no greater than 50% of a reference value
- DRM 7 Restrict discharge to no greater than 75% of a reference value
- DRM 8 Commence or increase discharge of energy to the grid.

National timeframe and DRMs



- Compliance with AS/NZS 4755 DRMs 0,1,2,3,4,5 and 8 to be required (or the equivalents in other approved standard) for products *registered* from 1 July 2026
- Controllers capable of managing the charging and/or discharging to the grid of EVs, that are intended for residential applications and capable of charging at SAE Level 2 or IEC Mode 3, to comply with any of the following standards:
 - AS/NZS 4755.3.4 (when published), or
 - AS/NZS 4755.2 (when published), or
 - an equivalent international standard, if an E3 technical working group determines by mid-2022 that there is one that provides equivalent capabilities to AS/NZS 4755.





- While GEMS IGA prefers nationally consistency in setting performance requirements
- The IGA notes that jurisdiction-specific requirements may be justified where there are significant environmental or infrastructure concerns, or to allow one jurisdiction to lead the way in accelerating the implementation of new or more stringent requirements
- In 2009 South Australia brought forward the Energy Council's national stringency requirements timetable for cooling energy efficient ratio for air conditioners. The rationale was to address the impacts of peak summer demand.





- Demand Response Capabilities for Selected Appliances South Australia Specific Analysis, May 2020
- Options:

- 1. Implement DR requirements in SA two years earlier than national timeframe
- 2. implement DR requirements in SA two years earlier than national timeframe, and require full range of DRMs and require compliance via 4755.2 (or equivalent) only
- 3. implement as per the national timeframe but require full range of DRMs and require compliance via 4755.2 only

SA context – cost benefit modelling



• Cost modelled:

- product designers, manufacturers (local and overseas), retailers, and suppliers
- businesses with existing stock that may not meet the requirements
- consumers, including costs from reduced product availability and consumer choice
- SA government to administer a local requirement, registration and compliance costs
- DR capable appliance connection and activation
- DR program participant servicing.
- Benefits modelled:
 - benefits of better managing periods when export of rooftop solar PV exceeds minimum demand
 - reducing wholesale electricity prices
 - improving electricity network reliability and security.

Local DR requirements for EV Chargers Market impacts of options

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Option 1 – Faster implementation of national timeframe	Option 2 – Faster implementation, full range of DRMs, 4755.2 only	Option 3 – Current implementation schedule, full range of DRMs, 4755.2 only
There is a low risk of restricting	There is a low risk of restricting	There is a low risk of restricting
purchaser choice compared to	purchaser choice compared to	purchaser choice compared to





• Option 1 – Faster implementation in 2024

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 Assuming medium projected activation rates from 2019 DRIS – 21% by 2036

Total Saving	Increase in costs \$M	Net Savings	BCR
\$M NPV	NPV	\$M NPV	
40.4	12.7	27.6	1.5

Source: GWA, Demand Response Capabilities for Selected Appliances – South Australia Specific Analysis, May 2020, Table 15





- Compliance with AS/NZS 4755 DRMs 0,1,2,3,4,5 and 8 to be required (or the equivalents in other approved standard) from 1 July 2024
 - i.e. faster implementation than national schedule
- Controllers capable of managing the charging and/or discharging to the grid of EVs, that are intended for residential applications and capable of charging at SAE Level 2 or IEC Mode 3, to comply with any of the following standards:
 - AS/NZS 4755.3.4 (when published), or
 - AS/NZS 4755.2 (when published), or

 an equivalent international standard, if the SA OTR approves one that provides equivalent capabilities to AS/NZS 4755.





- Sales restriction via *Electrical Products* (Safety and Efficiency) Act 2000.
- Creates an offence for offering for sale products that do not comply with DR performance standards.
- Suppliers will need to register complying products and supporting documentation for sale in SA.
- Feedback invited on the most efficient approval mechanism.





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SA Energy Performance and Demand Response Requirements for Water Heaters Consultation 17 March 2021

National context – DR requirements



- 2013 E3 CRIS 'Mandating Smart Appliance Interfaces for Air Conditioners, Water Heaters and other Appliances'
- 2019 Energy Ministers agreed to introduce demand response requirements for electric resistive water heaters, air conditioners, pool pump controllers and electric vehicle chargers.
- The AS/NZS 4755 framework is proposed as the technical standard to support the demand response capability requirement.
- The requirements will be introduced through the Commonwealth Greenhouse and Energy Minimum Standards Act 2012

Demand response 'modes' in the AS/NZS 4755 framework



- DRM 0 Disconnect, if equipped with a disconnection device
- DRM 1 No load, or minimum load
- DRM 2 Restrict load to no greater than 50% of a reference value
- DRM 3 Restrict load to no greater than 75% of a reference value
- DRM 4 Commence operation or increase load
- DRM 5 No discharge of energy to grid
- DRM 6 Restrict discharge to no greater than 50% of a reference value
- DRM 7 Restrict discharge to no greater than 75% of a reference value
- DRM 8 Commence or increase discharge of energy to the grid.




- Electric storage resistive water heaters (50 to 710 litres) to comply with:
- AS/NZS 4755.3.3:2014; or

- AS/NZS 4755.2 (when published)
- Compliance with DRM1 from 1 July 2023.

SA context – electric resistive water heaters current requirements

 Established houses with mains gas connections must be of a "*low emissions*" type (gas, solar or heat pump)

- Established houses without a mains gas connection must be low emissions or electric (max 250 litres)
- No restrictions for Class 2 dwellings (flats and apartments)

Local DR requirements for water heaters Cost benefit modelling

- Demand Response Capabilities for Selected Appliances South Australia Specific Analysis, May 2020 (GWA report)
- Options:

- 1. implement DR requirements in SA two years earlier than national timeframe
- 2. implement DR requirements in SA two years earlier than national timeframe, and require full range of DRMs and require compliance via 4755.2 only
- 3. implement as per the national timeframe but require full range of DRMs and require compliance via 4755.2 only

Local DR requirements for water heaters Market impacts of options

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Product	Option 1 – Faster implementation	Option 2 – Faster implementation, DRMs 1 and 4, compliance via 4755.2 only	Option 3 – Current implementation broader range of DRMs 1 and 4, compliance via 4755.2 only
Large Electric Resistive Storage Water Heaters (ERSWH)	There is a high risk of supplier withdrawal in South Australia.	There is a high risk of supplier withdrawal in South Australia.	There is a moderate risk of supplier withdrawal in South Australia.
Small ERSWH	There is a high risk of supplier withdrawal, if not exempt from these requirements, in South Australia.	There is a high risk of supplier withdrawal, if not exempt from these requirements, in South Australia.	There is a moderate risk of supplier withdrawal, if not exempt from these requirements, in South Australia.

Local DR requirements for water heaters Cost benefit modelling



• Cost modelled (as per national DRIS):

- product designers, manufacturers (local and overseas), retailers, and suppliers
- businesses with existing stock that may not meet the requirements
- consumers, including costs from reduced product availability and consumer choice
- SA government to administer a local requirement, registration and compliance costs
- DR capable appliance connection and activation
- DR program participant servicing.
- Benefits modelled (as per national DRIS):
 - benefits of better managing periods when export of rooftop solar PV exceeds minimum demand
 - reducing wholesale electricity prices
 - improving electricity network reliability and security.

Local DR requirements for water heaters of South Australia **Cost benefit modelling**

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Assuming medium activation rates from 2019 DRIS – 32.6% by 2036

Total Saving \$M NPV	Increase in costs \$M NPV	Net Savings \$M NPV	BCR
\$8.8 (small heaters)	\$3.4 (small heaters)	\$5.4 (small heaters)	2.6
\$24.3 (large heaters)	\$16.2 (large heaters)	\$8.2 (large heaters)	1.5

Source: GWA, Demand Response Capabilities for Selected Appliances – South Australia Specific Analysis, May 2020, Table 15

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- Review of Residential Sector Hot Water Requirements for South Australia, September 2020 (EES Report)
 - Assessment of trends in hot water ownership in South Australia and other jurisdictions
 - Net costs and benefits of three water heater policy options in South Australia (and five sub-options)
 - Sensitivity analysis
 - Quantification of benefits to householders of 27 types of water heaters configurations

The productivity objective



- Water heater review was modelled against a 'productivity' objective (maximising the economic value provided by each unit of energy used). This productivity objective recognises:
 - energy efficiency benefits
 - demand response benefit opportunities in the wholesale energy market
 - benefits to all consumers from use of electric resistive water heaters as energy storage during times of excess solar PV export

Water heater review - trends



- Electric water heater share has been decreasing in most Australian jurisdictions.
- The rate of decline in SA has been driven by SA water heater requirements.
- Share of gas water heaters in SA has been stable since 2009
- SA, NSW, ACT and Victoria all have increases in solar and heat pump water heaters share

Water heater trends



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Electric

Source: EES, Review of Residential Sector Hot Water Requirements for South Australia, September 2020, Figure 2

Water heater review – options



- A: no restrictions on the installation of electric water heaters
- B: no restrictions on the installation of electric water heaters that have DRM capability (5 sub-options examined)
- C: Option B but only where PV is installed

Water heaters Option B – sub-options



- B1 DRM1 only, national timeframe (i.e. same as Option A)
- B2 DRM1 and DRM4, national timeframe
- B3 DRM1 only, accelerated timeframe
- B4 DRM1 and DRM4 accelerated timeframe
- B5 DRM1 and DRM4 accelerated timeframe, minimum tank size

Water heaters – options impact on market share



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Source: EES, Review of Residential Sector Hot Water Requirements for South Australia, September 2020, Figure 6



DRM1 – emergency load shedding

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• Main capacity is derived from smaller electric storage on continuous tariff which may be on during peaks

DRM4 – increasing energy consumption

- Works by increasing energy on request by operating tank to a hotter thermostat temperature during periods of low net demand
- Main capacity is derived from medium to large electric storage on off peak tariffs

Assumed DR activation rates

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- Higher MEPS also assessed as a separate policy option
 - Potential consumer benefits would be marginal
 - No significant DRM1 or DRM4 benefits
 - Very large costs to industry
 - Consensus unlikely

Unlikely to be cost effective

Modelling annual energy costs versus demand





Water heaters – household modelling findings



- Modelling was done on energy and cost comparisons for 27 types of water heaters under a wide range of operating conditions.
- Under most scenarios, heat pumps operating on offpeak tariff provide the lowest life-time costs
- Heat pump and solar systems have an annual energy cost (including capital) that is about half of conventional electric, mains gas and LPG systems, but..

Water heaters – household modelling findings (contd)



- The new SAPN Time of Use tariff (solar sponge) presents an opportunity to make larger electric storage systems very cost effective if controlled to operate in the specified tariff windows
- The lower capital costs for electric storage water heaters offers lifetime advantages when operated on the solar sponge tariff
- There is now a place for policies to drive targeted use of electric storage, particularly where it is connected to the solar sponge tariff or a VPP using DRM4 or other technology





- Electric water heater share is declining under BAU
- Options A and B will not affect this significantly
- Policy C (PV) would reduce electric share considerably
- Option B4

- DRM1 activation has the capacity to reduce load by 10MW by 2030, mainly from small heaters – providing NPV of \$5M from emergency load shedding and \$15M network cost deferral benefits
- DRM4 activation has the capacity to deliver 100MW of additional load by 2030, mainly from large heaters – providing arbitrage benefits (switching to periods of lower wholesale prices) of NPV \$10M to 2030





- Current water heater policy has helped consumers reduce hot water costs and emissions in the past, but parts of the policy are now obsolete
- SA electricity generation is now well over 50% renewables, aspirations to reach 100% by 2030
- New Time of Use tariff (solar sponge) is a game changer in terms of making larger electric storage one of the lowest cost systems available, if controlled adequately

Proposed new SA requirements Electric water heaters



- Remove current restrictions that disallow electric storage where mains gas is available in Class 1
- Remove current tank limit of 250 litres for electric where main gas not available
- Electric resistive storage water heaters (50-710 litres) must have AS/NZS 4755.2 DRM1 or AS/NZS 4755.3.3:2014 DRM1 capability from **1 July 2021** (2 years earlier than national)
- Electric resistive storage water heaters (160-710 litres) must have AS/NZS 4755.2 DRM1 and DRM4 capability from 1 July 2023
- Requirements to apply to products sold after these dates, not only products registered after those dates.

Implementation pathway Electric water heaters



• Two pathways could be used:

- Installation standard under the Water Industry Act 2012 via NCC Vol 3 (i.e. as per the current mechanism)
- Sales restriction via Electrical Products Act 2000





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SA Demand Response Requirements for Air Conditioners Consultation 17 March 2021





- Energy Ministers have agreed to introduce demand response requirements for electric resistive water heaters, air conditioners, pool pump controllers and electric vehicle chargers.
- The AS/NZS 4755 framework is proposed as the technical standard to support the demand response capability requirement.
- The requirements will be introduced through the Commonwealth *Greenhouse and Energy Minimum Standards Act 2012*

DR modes in the AS/NZS 4755 framework



- DRM 0 Disconnect, if equipped with a disconnection device
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- DRM 3 Restrict load to no greater than 75% of a reference value
- DRM 4 Commence operation or increase load
- DRM 5 No discharge of energy to grid
- DRM 6 Restrict discharge to no greater than 50% of a reference value
- DRM 7 Restrict discharge to no greater than 75% of a reference value
- DRM 8 Commence or increase discharge of energy to the grid.

National timeframe and DRMs Air conditioners



- Compliance required for products *registered* from 1 July 2023
- Air conditioners up to 19kW cooling capacity to comply (DRM1, DRM2, DRM3) with:
 - AS/NZS 4755.3.1:2014, or
 - AS/NZS 4755.2, or

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• the equivalent of AS/NZS 4755.3.1:2012 (for a limited period of 2 years from the Determination)





- While GEMS IGA prefers nationally consistency in setting performance requirements
- The IGA notes that jurisdiction-specific requirements may be justified where there are significant environmental or infrastructure concerns, or to allow one jurisdiction to lead the way in accelerating the implementation of new or more stringent requirements
- In 2009 South Australia (and Queensland) brought forward the Energy Council's national stringency requirements timetable for cooling energy efficient ratio for air conditioners.



- Government of South Australia
- Demand Response Capabilities for Selected Appliances South Australia Specific Analysis, May 2020
- Options modelled:

- 1. Implement DR requirements in SA two years earlier than national timeframe
- 2. implement DR requirements in SA two years earlier than national timeframe, and require full range of DRMs and require compliance via 4755.2 only
- 3. implement as per the national timeframe but require full range of DRMs and require compliance via 4755.2 only

Air conditioners – cost benefit modelling



• Cost modelled (as per national DRIS):

- product designers, manufacturers (local and overseas), retailers, and suppliers
- businesses with existing stock that may not meet the requirements
- consumers, including costs from reduced product availability and consumer choice
- SA government to administer a local requirement, registration and compliance costs
- DR capable appliance connection and activation
- DR program participant servicing.
- Benefits modelled (as per national DRIS):
 - benefits of better managing periods when export of rooftop solar PV exceeds minimum demand
 - reducing wholesale electricity prices
 - improving electricity network reliability and security.

What does "greater stringency" mean?



- "Greater stringency" compared with Energy Ministers means:
 - Compliance based on supply after target date, not registration
 - Must comply with to AS 4755.2 (no AS/NZS 4755.3 compliance option; no DREDs)

Local DR requirements for air conditioners Market impacts of options



Option 1 – Faster implementation	Option 2 – Faster implementation and greater stringency	Option 3 – Current implementation schedule and greater stringency
Model choice would be moderately restricted for two years in South Australia.	Model choice would be heavily restricted for two years in South Australia.	More time to introduce compliant products in South Australia.
		There would be a low-price impact
There would be some price	There would be more price	for this product.
increase for this product in South	increases for this product in South	
Australia.	Australia.	There is a low risk of supplier withdrawal of this product in South
Demand Response Service	There is some risk of non-supply	Australia.
Providers (DRSPs) would need to	in South Australia.	
use demand response enabling devices (DREDs).		No DREDs would be required to use this product.

Local DR requirements for air conditioners Cost benefit modelling

• Option 3 – National timeframe, more stringency

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Assuming medium activation rates from 2019 DRIS – 32.6% by 2036

Total Saving	Increase in costs \$M	Net Savings	Benefit/cost
\$M NPV	NPV	\$M NPV	ratio
70.1	27.4	42.7	2.6

Source: GWA, Demand Response Capabilities for Selected Appliances – South Australia Specific Analysis, May 2020, Table 22

Proposed SA timeframe and DRMs Air conditioners



• Option 3

- Compliance required from 1 July 2023 (as per national timeframe)
- Requirements will apply to products offered for sale after 1 July 2023, not only products registered after that date.
- Air conditioners up to 19kW cooling capacity to comply (DRM1, DRM2, DRM3) with AS/NZS 4755.2 (i.e. no AS/NZS 4755.3 compliance option, no DREDs)

Implementation Pathway Air Conditioners



- Sales restriction via *Electrical Products* (Safety and Efficiency) Act 2000.
- Creates an offence for offering for sale products that do not comply with DR performance standards.
- Suppliers will need to register complying products and supporting documentation for sale in SA.
- Feedback invited on the most efficient approval mechanism.


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