

9th April 2021

dem.smartappliances@sa.gov.au.

Dear Sir/Madam

CESA Letter of Support: AWHF Submission Demand Response for Water Heaters

The Consumer Electronics Suppliers Association (CESA) welcomes the opportunity to comment on the ***Consultation: Proposed Demand Response Capabilities for Selected Appliances in South Australia***.

CESA is the premier national, industry body in Australia representing suppliers of consumer electrical and electronic appliances and equipment.

Comments of Support

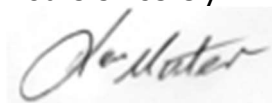
CESA is pleased to support the submission by the Australian Water Heating Forum (AWHF) on proposed Amendments to Local Energy Performance Requirements for Water Heaters.

CESA supports the opposition by AWHF to the proposed amendments and endorses the alternative solutions offered for consideration:

- Align the timing for the introduction of any new South Australian water heater regulations with those that occur at a national level;
- Avoid the stranded assets that "dumb, one-way communication" 4755.3 compliance will deliver to consumers;
- Exclude electric water heaters less than 125 litres in size from any demand response requirements, due to their limited contribution to demand response and the high proportional cost of compliance;
- Provide sufficient time (3 years) from the publication of 4755.2 before mandating it as a requirement, to allow product development to occur; and
- Investigate international demand response appliance standards that may potentially offer a lower cost of compliance than AS/NZS 4755

CESA looks forward to further consultation on this matter prior to the introduction of new regulations.

Yours sincerely



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