



13 April 2017

Energy Markets and Programs Division
Department of Premier and Cabinet
Government of South Australia

By e-mail: DSD.REES@sa.gov.au

Consultation paper on Retailer Energy Efficiency Scheme (REES) specifications

Origin Energy (Origin) welcomes this opportunity to comment on the Division's consultation paper on REES specifications for the 2018-20 period.

As a significant retailer of gas and electricity in South Australia, Origin has been a participant in the REES since its inception. In this response, we focus on specific issues raised in the consultation paper; these are set out below.

L1 – Install CFL or LED general purpose lamp (residential only)

Origin agrees that CFLs should not be included in scheme, limiting scheme eligibility to LED lighting given its wide prevalence and availability in the residential market. With removal of CFLs, Origin believes there should be provision to allow for uptake of LEDs from previous scheme participants that received CFLs especially in the case of priority group households.

Origin supports the option for a minimum 15,000 hour lifespan of LED lighting products. Most LED lights are manufactured with an intended life span above this level. Supporting this level would recognise the range of bulb types in the market and the potential for high quality lighting being installed.

L2A, L2B, L2C – Install LED down-light lamp or LED down-light luminaire (residential only)

Origin notes that these activities have only been undertaken under the REES since 2015. It is likely that this activity could become a significant contributor to meeting retailer obligations in the future.

We note that there is ambiguity on requirements in relation to the need for a certificate of electrical safety for this activity and would seek clarification on this. Again, we believe the lifetime of approved products should be set at a minimum of 15,000 hours.

CL1 – Commercial lighting upgrade (commercial only)

Origin considers that best practice for this activity would be the provision of evidence to support the achievement of AS/NZS 1680 at each site. Furthermore, evidence of LUX achievement should be provided before as well as after installation.

In relation to the 900GJ limit, we believe if this is not increased then there should be the option to complete multiple activities at one site each up to 900GJ limit. Vendors engaged in delivering eligible REES activities would be able to engage in multiple activities while on site, reducing inefficiencies in the delivery of activity.

Priority group households

Origin believes that the eligibility criteria for Priority Group households be expanded to include energy retail customers that have identified as experiencing bill shock or in a retailer hardship program. Such customers may not fit the definition of a Priority Group household, but would benefit from accessing REES activities especially Energy Audits.

We would welcome further discussion with the Division on this response. In the first instance, please contact David Calder on (03) 8665 7712.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'K. Robertson'.

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