

3.1 Energy Audit Specification

Are there any alternative specification requirements relating to the conduct of an energy audit that should be considered?

- In the Energy Audit Specification, it states that the total value of a phone interview in a regional or remote post code has a value of half of one credits towards the Energy Audit Target of the retailer (not exceeding 10%). YESS would purport that in-home assessments hold far greater value and as such, telephone audits be removed from the specification to be replaced with an in home regional assessment with a value of one and a half credits towards the Energy Audit Target with the 10% cap remaining.
- YESS believe that there are many South Australian Residential Customers who do not fall into an official “hardship” category or concession card type who would benefit from receiving the Energy Audit. The net has already been widened to offer services to financial counsellors, however YESS have had minimal referrals from this service. Some of our obliged retailers offer the energy assessment service to high bill stress customers, via YESS, at their own expense. YESS would like to see the Energy Audit made available to bill stress customers at the retailer’s discretion. The volume of these activities should also not exceed 10% of the total target.

3.17 L1 – Install CFL or LED General Purpose Lamp (Residential Only)

Given the uncertainty around LED lamp lifetime claims, should the assumed lamp lifespan remain as 10,000 hours or should an extended option be included under REES?

- An extended option should be included however the assumed lifespan should be increased to a min 15,000 hours and 20,000 hours. This better reflects the rated lifespan of products in the market and better rewards third party installers for seeking out higher quality, longer lasting product offerings.

If the 15,000 hours option is included is it likely to be delivered under REES?

- Yes. YESS believe this rating will be easy to achieve – there are currently far better rated products on the market. All Third-Party Providers should be installing A Blubs with a lifespan from 20,000-25,000 hours.

Additional Comments

- YESS question the significant reduction in the directional lighting claims and do not believe that the revised abatement correctly reflects the activity’s value.

3.18 L2A, L2B, L2C – Install LED Down-Light-Lamp or LED Down-Light Luminaire (Residential Only)

Given uncertainty around LED lamp lifespan claims, should the assumed lifespan remain as 10,000 hours, or should an extended option be included under the REES?

- An extended option should be included however YESS would support increasing minimum lifetime requirement from 10,000hrs to 30,000hrs with a proportional increase in abatement. It is understood that MEPS (minimum energy performance standards) will come into effect in 2018 and YESS understand it will be rolled out in a step by step approach with MEPS benchmarks increase year on year. Essentially meaning that Halogen downlights will be phased out due to increases in required efficacy. However, YESS believe that the penetration of high efficacy halogens has been overestimated through this time. Therefore, if halogens were phased out in 3-5 years and a halogen lasts around 3-4 years these products will be in place for the next 6-9 years minimum. This does not mean that real abatement cannot take place over the 5-10years. In both cases, the proposed abatement bands of 10,000hrs and 15,000hrs are wholly irrelevant for LED technology. Minimum L70 lifetimes of 30,000hrs are required for acceptance in ESS & VEET.

If the 15,000 hours option is included is it likely to be delivered under REES?

- Yes. YESS believe that many Third-Party Providers would already be installing LED Down-Lights with a lifespan from 30,000+ hours.

Should all activities delivered under L2 require that an Electrical COC be provided and retained?

- It is currently YESS procedure that all residential LED activities are completed with a COC, we believe this to be best practice. That said, there should be no stipulation that the completed COC can only be electrical.

Additional Comments

- YESS question the significant reduction in the residential LED lighting claim and do not believe that the revised abatement correctly reflects the activity's value. At the revised rate of abatement, YESS does not believe that it would be able to continue offering Residential LED Down-Light activities.

3.21 CL1 – Commercial Lighting Upgrade (Commercial Only)

Are there any health and safety concerns with the delivery of the CL1 to small customers that are not adequately addresses by the existing specification? Please provide evidence base to support your view.

- YESS believe that the existing specifications adequately address any health and safety concerns with the delivery of the CL1 to small customers. The Rules allow the customers to have their lights replaced if they are not satisfied with the lumen output and that best endeavours are made by installers to maintain existing lighting levels.

Should CL1 be amended to require that installations for small customers must be required to provide evidence of compliance to AZ/NSZ 1680?

- No

4.1 IHD1 Install and Commission an In-Home Display Unit (Residential Only)

Basted on the proposed specification and energy saving factors, do you consider that this activity will be delivered by REES?

- YESS believe that this is activity partners well with residential LED downlights and (where required) both could be delivered within the same appointment making the viability of the offering much more solid. It would be preferred that no battery powered displays are used, alternatively it could feed data to an application on the resident's mobile device which would be a more efficient and sustainable option as opposed to the battery powered unit being placed within the home.