

Tamsyn Hinksman, Senior Policy Officer
Essential Services Commission (ESCOSA)
Sent to: escosa@escosa.sa.gov.au

11 December 2020

Dear Tamsyn,

Feedback on Draft Retailer Energy Productivity Scheme (REPS) Code

Green Energy Trading welcomes the opportunity to provide feedback regarding the draft REPS Code.

We are looking forward to participating in the new REPS in 2021, aiming to partner with several Retailers as a third party. Our feedback in regard to the draft REPS Code comes from over 13 years' experience working within similar carbon abatement programs, such as the RET, VEU and ESS so we have keen insight into how to deliver compliant energy saving activities while supporting scheme integrity.

We appreciate that the draft REPS Code includes only necessary and consequential changes that the Commission requires to administer the new REPS into 2021 and that a review will be conducted after the program has run for six months. We provide this feedback to assist the Commission in their next review to help simplify some of the operational aspects of the program and remove administration burdens for REPS participants.

Specific Feedback

Section 4.3.1 requires records in relation to each Energy Productivity Activity are "*kept within the possession or control of an obliged retailer for at least a period of 5 years following the expiry of Part 4 of the Electricity (General) Regulations 2012 and Part 4 of the Gas Regulations 2012*"

Does this mean that a Retailer has to keep all records until 2030, the scheduled end of REPS? That is a very long time and will result in a retailer having to store and maintain very large volumes of electronic data over that period, increasing cost burden for storage and maintenance systems. Suggest this section is amended to require retailers to only maintain activity records for a 5 or 6 year period after the activity is *completed*, brining REPS line with other programs and reducing data retention costs.

Section 6.1.1 requires a written Information Statement be provided to the customer "*at the time the activity is performed*". This is very ambiguous and increases the difficulty of ensuring compliance. We suggest the Commission specify a specific date that the statement must be provided to the Customer by so that compliance with this requirement can be easily monitored. For example, specify that it must be provided on the day of completion of the project.

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Section 6.5.1 Mandatory safety requirements require all installers to be trained by 31 March each year. This is problematic for two reasons:

1. Installers are technically able to commence installations in January-March prior to having been trained, resulting in potentially non-compliant installations, and
2. Turnover of staff/contractors will inevitably lead to installers dropping off during the year and Retailers need to find new installers to continue completing projects later in the year to fulfil targets. Mandating only installers trained as of 31 March can carry out activities for a Retailer will increase the risk that Retailers will fail to meet targets if their list of trained installers dwindles.

Suggestion: change the requirement so that all installers have to be trained/qualified prior to them engaging in any energy saving activity, regardless of when they come onboard with the Retailer. This would give flexibility to Retailers and Third Parties to find additional resources when needed and reduce the risk of non-compliance and missing targets. This will also bring REPS in line with other programs that require participants to maintain regular and ongoing training systems and Installer Registers throughout the year. This would allow participants to streamline their training activities with the other schemes and reduce administrative burden of having to manage all the years training activities in one go by the end of March.

General Feedback

Section 2.2.2 contains a reference error: "*In making a determination for a REPS year under clause **Error! Not a valid bookmark self-reference.***"

Section 5.4.1 contains a reference error: "*Where the Commission's determination is that an obliged retailer has failed to meet an energy productivity target, the Commission will issue a shortfall notice under clause **Error! Reference source not found.***"

About us

Green Energy Trading, incorporating National Carbon Bank of Australia (NCBA), is one of Australia's largest environmental certificate agents and we are committed to making incentives for renewable energy and energy efficiency activities more accessible to Australians.

Our operations in the energy efficiency and the renewable energy industries span many activities across Australia, including the RET, NSW ESS, Victorian VEU and the Federal ERF. We represent the views of a diverse range of stakeholders from individual homeowners and consumers, to electrical contractors, solution providers to large corporate entities. We feel that clear and considered approach to evolving the Energy Efficiency Scheme in South Australia will benefit the large number of market participants and support businesses to transition to more sustainable practices in the State.

Thank you for your consideration of this submission.

Yours sincerely,



Caroline Bennett
Research, Development & Compliance Manager