

# RESIDENTIAL ENERGY EFFICIENCY SCHEME CODE (REES CODE) – PROPOSED AMENDMENTS

*Draft Decision*

October 2014



## REQUEST FOR SUBMISSIONS

The Essential Services Commission of SA (**the Commission**) invites written submissions from members of the community on this paper. Written comments should be provided by **7 November 2014**.

It is the Commission's policy to make all submissions publicly available via its website ([www.escosa.sa.gov.au](http://www.escosa.sa.gov.au)), except where a submission either wholly or partly contains confidential or commercially sensitive information provided on a confidential basis and appropriate prior notice has been given.

The Commission may also exercise its discretion not to publish any submission based on length or content (for example containing material that is defamatory, offensive or in breach of any law).

Responses to this paper should be directed to:

### **Residential Energy Efficiency Scheme Code (REES Code) – Proposed Amendments - Draft Decision**

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## GLOSSARY OF TERMS

COMMISSION	Essential Services Commission of South Australia, established under the Essential Services Commission Act 2002
DEEMED VALUES	Carbon dioxide equivalents (in tonnes) to be attributed to a specific approved energy efficiency activity
DEPARTMENT	Department of State Development (formerly the Department of Manufacturing, Innovation, Trade, Resources and Energy (DMITRE))
ELECTRICITY ACT	Electricity Act 1996 (SA)
ELECTRICITY REGULATIONS	Electricity (General) Regulations 2012 (SA)
ESC ACT	Essential Services Commission Act 2002
GAS ACT	Gas Act 1997 (SA)
GAS REGULATIONS	Gas Regulations 2012 (SA)
GJ	Gigajoules
MINISTER	The Minister responsible for the administration of the Electricity Act 1996 (SA) and/or the Gas Act 1997 (SA)
MINISTERIAL PROTOCOL	Residential Energy Efficiency Scheme (REES) Protocol set by the Minister for Energy, November 2008
NERL RETAILERS	The holder of a retailer authorisation under the National Energy Retail Law or an exempt seller within the meaning of the National Energy Retail Law
REES	Residential Energy Efficiency Scheme
REES CODE	Refer <a href="http://www.escosa.sa.gov.au/residential-energy-efficiency-scheme-rees/rees-regulatory-documents.aspx">http://www.escosa.sa.gov.au/residential-energy-efficiency-scheme-rees/rees-regulatory-documents.aspx</a>
REES OBLIGED RETAILERS	Refer <a href="http://www.escosa.sa.gov.au/residential-energy-efficiency-scheme-rees/rees-obliged-retailers.aspx">http://www.escosa.sa.gov.au/residential-energy-efficiency-scheme-rees/rees-obliged-retailers.aspx</a>
REES-R	REES Retailer File Validation System
REGULATIONS	Part 4 of the Electricity (General) Regulations 2012 and Part 4 of the Gas Regulations 2012
SCHEME	Refer to REES
T CO <sub>2</sub> -E	Tonnes of carbon dioxide equivalent

# 1. INTRODUCTION

The Essential Services Commission of South Australia (**Commission**) is established under the Essential Services Commission Act 2002 (**ESC Act**), as the independent economic regulator of essential services in South Australia. The primary objective of the Commission is the protection of the long-term interests of South Australian consumers with respect to the price, quality and reliability of essential services.

One of the Commission's functions within both the electricity and gas industries is to administer the Residential Energy Efficiency Scheme (**REES**). That scheme was established by the South Australian Government in 2008 and commenced on 1 January 2009.

REES is currently given statutory effect through Parts 4 of the Electricity (General) Regulations 2012 and Gas Regulations 2012 (the **Regulations**), and these establish the Commission as the administrator of REES.

These parts of the Regulations are set to expire on 31 December 2014, however, on 28 November 2013, the Minister for Mineral Resources and Energy announced that the Government would extend the scheme to 2020 and expand it to include small businesses. This announcement coincided with the Minister tabling a REES Review Report<sup>1</sup> in Parliament. On 18 August 2014, the Department of State Development (the **Department**) released a Consultation Paper on proposed REES thresholds, metrics and activity specifications (**Department's Consultation Paper**)<sup>2</sup> for REES post 2014. The Minister will now set and review REES activity specifications (a role previously undertaken by the Commission). The Government will be amending Part 4 of the Regulations once it finalises the changes to REES thresholds, metrics and activity specifications.

To reflect the Department's proposed changes to REES thresholds, metrics and activity specifications from 1 January 2015, the Commission has reviewed, and proposes changes to, the REES Code. The proposed changes to the REES Code are primarily driven by the proposals in the Department's Consultation Paper; however, the Commission has taken the opportunity to make other changes to improve the administration of REES.

## 1.1 Background

The Residential Energy Efficiency Scheme Code (**REES Code**) commenced in January 2009 as an industry code<sup>3</sup> and is binding on energy retailers operating in South Australia.

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<sup>1</sup> Department of Manufacturing, Innovation, Trade, Resources and Energy, *Review Report of the Residential Energy Efficiency Scheme (REES), Part 4 of the Electricity (General) Regulations 2012, under the Electricity Act 1996, and Part 4 of the Gas Regulations 2012, under the Gas Act 1997*, October 2013, viewed 15 September 2014, available at [http://www.sa.gov.au/\\_data/assets/pdf\\_file/0004/36319/REES-Review-Report.pdf](http://www.sa.gov.au/_data/assets/pdf_file/0004/36319/REES-Review-Report.pdf).

<sup>2</sup> Department of State Development, *South Australian Energy Efficiency Scheme, Consultation Paper on Proposed REES Thresholds, Metrics & Activity Specifications*, August 2014, viewed 15 September 2014, available at [http://www.sa.gov.au/\\_data/assets/pdf\\_file/0019/114319/REES-Consultation-Paper-2014-A542706.pdf](http://www.sa.gov.au/_data/assets/pdf_file/0019/114319/REES-Consultation-Paper-2014-A542706.pdf).

<sup>3</sup> Pursuant to the powers of the Commission under section 28 of the ESC Act.

The REES Code establishes requirements in relation to the conduct and operations of energy retailers in satisfaction of their REES obligations, including:

- ▲ the allocation and notification of, and obligation to achieve, energy audit targets, energy savings targets and priority group energy savings targets.
- ▲ record-keeping and reporting obligations (including data integrity assurance mechanisms) in relation to energy audit targets, energy savings targets and priority group energy savings targets.
- ▲ compliance and audit obligations (including provisions for Annual Compliance Plans) in relation to energy audit targets, energy savings targets and priority group energy savings targets.

National Energy Retail Law energy retailers (**NERL retailers**) are required to comply with the REES Code pursuant to section 63AB(1)(a) of the Electricity Act 1996 (**Electricity Act**) and section 59A(1)(a) of the Gas Act 1997 (**Gas Act**).

## *1.2 Process and consultation*

Although the framework for REES from 1 January 2015 is still to be finalised, the Commission is consulting on draft changes to the REES Code at this time to provide transitional certainty and to allow energy retailers and stakeholders to comment on the proposed amendments. Should the Minister make material changes in finalising the regulatory workings of REES, the Commission will reflect those matters in its final decision on changes to the REES Code.

REES activity specifications will no longer form part of the REES Code, as the Minister will have responsibility for setting and reviewing REES activity specifications. The Commission is therefore **not** consulting on the Department's activity specifications, nor the Department's proposed REES thresholds or metrics. The proposed REES activity specifications are available in the Department's Consultation Paper<sup>4</sup>. Interested parties should contact the Department regarding the development and review of these specifications.

The Commission is seeking submissions on the proposed amendments to the REES Code, as set out in section 2 of this Draft Decision, by **7 November 2014**.

Details on how to make submissions on this Draft Decision and the associated REES Code are provided on the inside cover of this paper.

Following public consultation on this REES Code Draft Decision, the Commission will release its REES Code Final Decision and final version of the amended REES Code in December 2014, to come into effect from 1 January 2015.

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<sup>4</sup> Department of State Development, pp. 17-94.

## 2. PROPOSED REES CODE AMENDMENTS

The key draft amendments to the REES Code are outlined in this section.

### 2.1 *Renaming of Scheme and metric change*

From 2015, REES will be renamed the Retailer Energy Efficiency Scheme and expanded to allow obliged retailers to meet their targets by delivering energy savings to small businesses as well as homes. The Scheme targets have also been changed from a greenhouse gas metric (tonnes of carbon dioxide equivalent (tCO<sub>2</sub>e)) to an energy metric (expressed in gigajoules (GJ)).

#### *Draft Decision*

All references to the Residential Energy Efficiency Scheme throughout the Code are proposed to be updated to the Retailer Energy Efficiency Scheme. Likewise, with the change of metric to energy savings, all references to Greenhouse Gas Reductions and the associated targets are proposed to be updated to energy reduction or energy saving.

### 2.2 *Functions and powers*

Part 4 of the Regulations assign the Commission the function of maintaining, reviewing and amending the Energy Efficiency Activities that can be undertaken in REES. The Minister established a Protocol outlining the key principles and constraints which the Commission must have regard to in maintaining and reviewing the list of activities, their specifications and deeming values. The Ministerial Protocol required the Commission to undertake a full review of activities in 2011. The Commission also made public calls in 2012 and 2013 for new REES activities and applications to vary or delete existing activities.

#### *Discussion*

The Department is proposing amendment of the Regulations to reflect that the Minister has taken on the role of setting, reviewing and gazetting REES activity specifications, a role previously undertaken by the Commission. The Department undertook a full review of REES activities to set the activities for REES to apply from 1 January 2015, and will undertake any subsequent reviews required to update the REES activity list between 2015 and 2020. The Minister will also be responsible for gazetting activities and the minimum specifications for those activities.

The Department's Consultation Paper<sup>5</sup> also detailed proposed changes to the REES Ministerial Protocol, which sets out the principles to be used in maintaining and reviewing the list of calculation methods, eligible activities and their specifications.

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<sup>5</sup> Department of State Development, p. 10.

The Minister will continue to have responsibility for maintaining and reviewing the Minister's Energy Audit Minimum Specification.

Parties interested in the development and review of REES activity specifications, the REES Ministerial Protocol or the Minister's Energy Audit Minimum Specification should contact the Department. The Commission will provide clear links on its website to these documents.

### *Draft Decision*

To reflect the change in roles for the new phase of REES, the Commission proposes removal of the following sections from the REES Code:

- ▲ parts of clause 1.4 - Powers and functions of the Commission.
- ▲ section 7 - Determination of energy efficiency activities.
- ▲ the Energy Efficiency Activities Minimum Specification Schedule.
- ▲ the Minister's Energy Audit Minimum Specification Schedule.
- ▲ the REES Ministerial Protocol Schedule.

## *2.3 Determination of obliged retailers*

The Regulations set out the method by which the Commission determines which energy retailers have REES obligations in any year. An energy retailer is currently considered a REES obliged retailer if they had more than 5,000 residential electricity customers or more than 5,000 residential gas customers as at 30 June in the preceding year. All REES obliged retailers are set a REES greenhouse gas reduction target, a REES priority group greenhouse gas reduction target and a REES energy audit target.

The Minister sets the overall annual greenhouse gas reduction target to be achieved, the proportion (35%) of greenhouse gas reduction activities required to be undertaken in low-income households, and the overall number of energy audits to be undertaken by obliged retailers. The Commission apportions the greenhouse gas reduction target with reference to electricity and gas sales, and apportions the energy audit target with reference to residential electricity or gas customers (according to formulae set out in the Regulations).

### *Discussion*

The Department's Consultation Paper proposes that energy retailers' REES obligations from 1 January 2015 be set according to the following REES thresholds<sup>6</sup>:

- ▲ electricity or gas retailers who retail to 5,000 or more South Australian residential customers<sup>7</sup> are to be set a REES energy savings target, a REES priority group energy savings target and a REES energy audit target.

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<sup>6</sup> Department of State Development, p. 6.

<sup>7</sup> There will remain separate electricity and gas obligations under REES. The 5,000 residential customer threshold will continue to apply separately to the number of gas and electricity customers.



- ▲ other electricity retailers, that purchase, in the preceding financial year, 27,000 MWh or more of electricity for on-selling to South Australian customers are set a REES energy savings target.
- ▲ other gas retailers, that purchase, in the preceding financial year, 100,000 GJ or more of gas for on-selling to South Australian customers are set a REES energy savings target.

The Department's Consultation Paper also proposes that energy retailers be allowed to net out the following sales from their total energy purchases for the purpose of determining exceedance of a REES threshold:

- ▲ annual sales to individual larger customers of 30,000 MWh or more of electricity, and/or
- ▲ annual sales to individual larger customers of 100,000 GJ or more of gas.

The Department is yet to advise what constitutes an individual customer for the purposes of determining the sales an energy retailer can net out.

The Commission will require that energy retailers provide statistical information on the number of South Australian residential customers they have and their total electricity and gas sales to individual larger South Australian customers.

The threshold changes are likely to increase the number of energy retailers with a REES obligation from 1 January 2015.

### *Draft Decision*

The Commission proposes to update the Code to reflect the proposed changes in obligation thresholds.

The Commission proposes to refer to energy retailers that meet the 5,000 residential customers threshold as **primary obliged retailers**. Primary obliged retailers will be set a REES energy savings target, a REES priority group energy savings target and a REES energy audit target. Energy retailers that don't meet the primary threshold but meet the threshold for either electricity and/or gas purchases (27,000 MWh or 100,000 GJ) will be referred to as **secondary obliged retailers**, and will only be set a REES energy savings target. Retailers will continue to have separate electricity and gas REES obligations.

## *2.4 Reporting requirements*

The Commission currently requires retailers to provide a REES reporting statement on a quarterly basis (including for nil returns). This statement includes the data files for that quarter, any applicable declarations and a signed responsibility statement.

Currently, the data reported are validated and assessed for multiple claims by the Commission based on the transaction date of the individual energy efficiency activity or energy audit. From 1 January 2015, validation will be based on the date the energy efficiency activity or energy audit is first reported to the Commission.

## *Discussion*

The Commission is expanding the REES Retailer File Validation System (**REES-R**) to allow for real time compliance checking and lodgement of data by retailers or their contractors.

The expanded REES-R will have three main functions:

- ▲ **Validation:** This process reflects the current functionality of the REES-R. Obligated retailers or third party providers will be able to validate data for format and address errors and compliance against a number of activity specific rules including multiple claims assessment and activity quantity limits (where applicable).
- ▲ **Lodgement:** Obligated retailers or third party providers will be able to lodge data that passes the validation process. Once data becomes valid it is considered reported to the Commission.
- ▲ **Submission:** Obligated retailers will be able to review validated data lodged on their behalf and accept those data for submission towards annual target/s.

Obligated retailers and their contractors will be able to submit data through the REES-R whenever they choose. The Commission therefore considers there is limited value in continuing to require retailer quarterly reporting of activity and audit data including the submission of quarterly responsibility statements.

Retailers will still need to submit declarations to the Commission in relation to address errors and changes of occupancy at a premises. REES activities and energy audits that require a retailer declaration will not be counted towards a retailer's REES target until the Commission has received the declarations.

The Commission will provide training and guidance to obligated retailers on the reporting requirements of the expanded REES-R.

## *Draft Decision*

The Commission proposes removal of the quarterly reporting requirements. The Commission will provide quarterly retailer activity statements and will consider public reporting of that information.

It is proposed that the Code be updated to require all declarations for activities and energy audits reported in a REES year to be received by the end of that REES year. If declarations are not received, then those activities and energy audits will not count towards a retailer's target for that year (but can be submitted in a following REES year). The Code will require declarations to be signed by an authorised senior officer (as detailed in the retailer's annual compliance plan).

It is proposed that the Reporting Specification schedule will be removed from the Code, as it will no longer be relevant, and that Schedule 3 – REES Activity Records (previously Schedule 5) be updated to reflect proposed changes to individual activity specifications.

## 2.5 Compliance plans

Obligated retailers are required to submit a compliance plan at the beginning of each REES year (due by 31 March) outlining at least the following information:

- ▲ a statement from the Chief Executive Officer (or other authorised person) acknowledging the retailer's REES obligations and responsibilities.
- ▲ the obliged retailer's complaint and dispute resolution procedures in relation to REES.
- ▲ the training systems and processes provided to retailers' contractors and or agents.
- ▲ the systems and processes in relation to mandatory training requirements.
- ▲ the systems and processes in place to ensure those persons undertaking REES activities in a residential customer's premises are fit and proper.
- ▲ the retailer's internal allocation of REES responsibilities.
- ▲ the resources, systems and processes which the retailer intends to use to ensure that its REES obligations and responsibilities will be met.

Retailers are required to advise the Commission of any material changes to the information provided in their compliance plans (such as a change in the activities it intends to undertake) within 20 business days of such a change occurring.

### *Discussion*

The changes to REES from 2015 place a greater level of responsibility and autonomy on obliged retailers and third party providers in relation to the reporting of energy efficiency activities and energy audits undertaken. In line with this, the Commission considers it necessary to strengthen the compliance reporting requirements, to provide assurances that REES obligations are being appropriately addressed by retailers with all relevant systems, processes and controls being sufficiently robust.

The removal of quarterly reporting requirements places a greater importance on retailers' systems and processes for reviewing activities and energy audits lodged by third party providers in REES-R. While current compliance plans detail these systems and processes, the Commission does not always receive information from obliged retailers on any REES related reviews and audits they may undertake. Such reviews and audits may highlight any deficiencies that need to be addressed. By receiving details of these reviews and audits, any material compliance issues uncovered and the measures put in place to address the compliance issues, the Commission will gain greater assurance that REES Code requirements are being adhered to.

## *Draft Decision*

The Commission proposes to make the following amendments to the REES Code relating to compliance plans:

- ▲ the annual statement from the Chief Executive Officer will require the provision of assurance as to the capacities of third party providers and a statement (relating to the previous REES year) identifying any REES related internal reviews or audits undertaken of obliged retailer or third party provider systems and process and any compliance concerns raised through those reviews.
- ▲ compliance plans will need to include copies of the template activity forms provided to residential and commercial customers in relation to energy audits and energy efficiency activities performed. These templates must be consistent with the requirements of Schedule 3 – Activity Records and the individual energy efficiency activity and energy audit specifications.
- ▲ retailer to nominate an authorised senior officer to sign declarations (relating to address errors and changes of occupancy at a premises).

## *2.6 Hardship*

One of the Government’s original objectives of REES was to assist South Australians, particularly those on low incomes, to reduce their energy bills. To help achieve this, the current Regulations require all energy audits and a minimum of 35% of energy efficiency activities to be undertaken in low income households (referred to as priority group households). The Government’s REES Review Report recommended that the scheme objective be recast “to reduce household and business energy use, with a focus on low-income households”.<sup>8</sup>

The Regulations define the residential premises which are considered priority group households. People who hold a Government concession card, receive a Government Energy Concession, or fall in a category of people experiencing hardship, as defined by the Minister or the Commission, are considered to live in priority group households for the purposes of REES. Clause 1.7 of the Code identifies hardship program customers as a class of persons who are experiencing hardship and fall under the definition of a priority group household.

## *Discussion*

The Department’s REES Review Report<sup>9</sup> recommended that the Government work with the Commission to broaden the classes of households that fall within this priority group to include others facing energy-related financial stress, that aren’t currently captured. The REES Review Report did not specify any objective criteria that should be used in determining further priority group categories, but did recommend that community and welfare groups could play a role in referring people for assistance under the scheme. The Commission notes

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<sup>8</sup> Department of Manufacturing, Innovation, Trade, Resources and Energy, p. 12.

<sup>9</sup> Department of Manufacturing, Innovation, Trade, Resources and Energy, p. 13.

that community and welfare groups can, are already are, referring people to REES third party providers.

### *Draft Decision*

The Commission seeks input on the objective criteria for determining other households that should fall within the priority group, and how a referral process could work to refer households directly to obliged retailers or service providers for assistance under REES.

## *2.7 Conversion of energy credits and shortfalls*

REES energy efficiency targets are currently expressed in greenhouse gas emissions savings (tCO<sub>2</sub>-e). From 2015, these targets will be in energy savings (expressed in GJ). As at 31 December 2014, retailers may have accrued energy efficiency activity credits or may have a shortfall that will be added to their 2015 target. It is proposed that the new phase of REES will allow conversion of pre 2015 credits and shortfalls from tCO<sub>2</sub>-e to GJ.

The Commission understands that the amended Regulations will require the Commission to determine the manner in which energy credits and shortfalls accrued by obliged retailers before 1 January 2015 are converted from tCO<sub>2</sub>-e into a deemed energy saving value in GJ.

### *Discussion*

The Commission has developed a conversion factor for translating energy credits denominated in tCO<sub>2</sub>-e into normalised gigajoules.

Each REES activity undertaken has a deemed greenhouse gas savings value (tCO<sub>2</sub>-e) and a corresponding deemed energy savings value (in GJ). The conversion rate between the deemed greenhouse gas savings and the deemed energy savings depends on the mix of fuels (electricity, gas and wood) that are saved by each activity. The mix of fuels saved is different for each activity, e.g. lighting products save only electricity but insulation products save electricity, gas and wood. The Australian Government publishes emissions factors annually, including those for consumption of purchased electricity, consumption of natural gas and combustion of wood, in its National Greenhouse Accounts Factors publication.<sup>10</sup> The energy efficiency activity reviews that have been undertaken by the Commission have applied the relevant emissions factors applicable at that time in calculating deemed greenhouse gas savings for REES activities. These emissions factors have been used to calculate the conversion rates (GJ/tCO<sub>2</sub>-e) for each activity undertaken in REES between 1 January 2012 and 30 June 2014.

The conversion rates have been adjusted by applying normalisation factors (detailed in the Department's Consultation Paper<sup>11</sup>) for each fuel to the energy savings of each activity. This

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<sup>10</sup> Department of the Environment, *National Greenhouse Accounts Factors*, Final Report, July 2014, viewed 29 September 2014, available at <http://www.environment.gov.au/climate-change/greenhouse-gas-measurement/tracking-emissions>.

<sup>11</sup> The Department's Consultation Paper lists the normalisation factors (Department of State Development, p. 8) and states that applying normalisation factors to energy savings aligns the savings metric with the co-benefits of energy costs savings and greenhouse gas reduction, per the REES objectives.

is appropriate, as it ensures consistency with the proposed calculation methodology for energy savings under REES from 2015.

An overall conversion factor has been calculated by weighting the activity conversion rates (normalised GJ/tCO<sub>2</sub>e) by the total deemed greenhouse gas savings attributed to each activity.<sup>12</sup> The calculated conversion factor is 4.02 normalised GJ/tCO<sub>2</sub>e.

### *Draft Decision*

The Commission proposes to convert all obliged retailer greenhouse gas credits at 1 January 2015 (in tCO<sub>2</sub>e) to energy savings credits (in normalised GJ) using the conversion factor of 4.02.

If an obliged retailer has a shortfall in one of its greenhouse gas targets in 2014, it is proposed that this conversion factor be used to convert the shortfall into additional energy savings that that obliged retailer will be required to make in 2015.

## 2.8 Cut-off date for reporting of pre-2015 energy efficiency activities and energy audits

The Commission understands that the amended Regulations will require the Commission to set a cut-off date for reporting of energy efficiency activities and energy audits undertaken in the 2014 REES year.

### *Discussion*

The Government's proposed changes to REES require the Commission to redevelop its REES-R IT system. However, the new REES-R system will need to run in parallel (for a period of time) with the current REES-R to deal with the delayed reporting of 2014 activity data in 2015. All pre-2015 REES energy efficiency activities will need to be reported in tCO<sub>2</sub>e, whilst activities undertaken from 1 January 2015 will be reported in GJ.

After the cut-off date, the Commission will not accept any pre-2015 activities and audits to be reported. It will therefore be important for retailers to work closely with their third party providers to ensure all pre-2015 activities and audits are reported promptly.

The Commission wishes to minimise running parallel REES-R systems as it will be technically and administratively complex to manage. However, the Commission understands that having an extended cut-off period for reporting 2014 activities and audits may be beneficial to some retailers and third party providers. Various alternatives for the reporting cut-off have been considered.

An extended cut-off date for pre-2015 reporting would mean that the Commission would be delayed in finalising its 2014 energy retailer determinations.

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<sup>12</sup> Greenhouse gas savings by activity are for the period 1 January 2012 to 30 June 2014.

### *Draft Decision*

The Commission proposes to set 27 February 2015 as the final day on which pre-2015 REES energy efficiency activities and energy audits will be accepted by the Commission. Energy retailers will still be required to submit their quarter 4 2014 report to the Commission by 30 January 2015, but will have a further 20 business days to report any additional pre-2015 activities and audits to the Commission.

The Commission seeks feedback on these proposed transitional provisions, in particular, reasons for adopting any alternative cut-off date and procedure.

### 3. NEXT STEPS

Following the period of public consultation on this Draft Decision, the Commission will release its REES Code Final Decision and final version of the amended REES Code in December 2014.

The Commission invites written submissions from interested parties in relation to its proposed amendments to the REES Code. Written comments should be provided by **7 November 2014**. It is highly desirable for an electronic copy of the submission to accompany any written submission. Please refer to submission instructions on the inside cover of this paper.





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