

## **Embertec Pty Ltd Submission**

### **REES Code – Proposed Amendments – Draft Decision**

Embertec is an Australian developer and manufacturer of energy efficiency technology. Embertec is an SME which spends more than \$1M annually on research and development in the energy efficiency field. Embertec has extensive experience as an equipment supplier of products for installation under REES and to installers accredited to the Victorian Energy Efficiency Target (VEET) scheme. Embertec welcomes the opportunity to comment on the proposed amendments.

#### **Standby Power Controllers**

Standby Power Controllers (SPCs) have been shown in the REES and VEET schemes to provide significant power savings. These savings are appreciated by householders, who are likely to take SPCs with them when they move house. The current restriction of installation by house address acts to disadvantage subsequent householders at an address where such installation and removal has taken place. This disadvantage is more likely to be felt by households who rent, who are also more likely to be low income households.

Accordingly, Embertec supports the proposed decision to allow multiple SPC installations in the case of a change in occupancy of a premises.

It is important for the continuing credibility of REES that the deeming scores for SPCs be directly related to the carbon emissions saved by the use of the particular SPC. All SPCs are not of equal utility and anything which ties the deeming score more closely to demonstrated performance is welcome.

Accordingly, Embertec supports the proposed decision to amend the deeming scores to preserve the relativities between the classes of SPC.

#### **Install Efficient ELV Down Lights**

Embertec supports the proposed decision to allow the Commission to specify alternative means of LED certification. We would urge the Commission to make broader use of the new power than is suggested in the Draft Decision. Even when the main stumbling block to lamp only retrofits – the lack of approved lamps – is rectified by the amendment, there will still be many circumstances where any given lamp will be unsuitable for a particular household installation. In order to be sure that any household with downlights which is approached by an installer can in fact be properly serviced with the installation of LED replacement down lights, the installer must have access to a wide range of possible solutions. Experience gained in other markets, and access to the same solutions developed in those markets, will eliminate the unsatisfactory installations caused by dealing with unknown incompatibilities.

**Maximum Savings, Zero Effort**



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It is suggested that REES should benefit from the experience gained in the Victorian market. The ESCV has implemented strict requirements for approval of LED products. These apply to all classes of approvals under Schedules 21A-D. Detailed evidence of compliance with defined international standards is required. These requirements are at least as strict as the requirements of the Lighting Council of Australia SSL scheme. When acting within the proposed Specification 6, the Commission should not restrict itself to accepting ESCV approval only for products under Schedule 21C, but could also accept LED products approved by the ESCV under the other relevant sections of Schedule 21.

The proposed requirements of the New Specification regarding ongoing performance of the replacement down lights is supported. Such a requirement is very important to ensure that the LED roll-out is accepted by householders, and that halogen lamps are not refitted by the householder due to poor performance of the LED retrofit.

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