



Essential Services Commission
Level 8, 570 Bourke Street
Melbourne Victoria 3000
veu@esc.vic.gov.au

31 October, 2024

Dear Sir/Madam,

Response to the “consultation on requirements for water heating and space heating and cooling activities” (October 2024).

Green Energy Trading (GET) welcomes the opportunity to respond to the consultation concerning the proposed changes to the water heating and space heating and cooling activities and hope our feedback proves valuable as these changes are finalised.

GET understands the purpose of the proposed changes listed in the consultation document and makes the following submission:

Decommissioning guidance and decommissioning and disposal record-keeping requirements

GET believes the current decommissioning and disposal regime is fit-for-purpose and does not require changing.

In our experience scheme participants have found adhering to the current compliance and documentation requirements for decommissioning achievable but note the main issue concerns finding a convenient disposal depot which can usually be quickly resolved by checking the online EPA Permissioning decisions register (<https://www.epa.vic.gov.au/about-epa/public-registers/permissions>).

Furthermore, we feel the proposed change to replace the decommissioning record requirement with a photo of the old unit rendered permanently unusable at the premises does not sufficiently prove that the old unit has been recycled appropriately.

However, should the commission decide to change the current decommissioning evidence requirement, we suggest implementing the following:

- Updating the **Assignment Form** to include a new section listing:
 - The name of the recycling company
 - The address of the recycling company
 - The EPA accreditation details for the recycling company
 - The quantity and (approximate) weight of unit(s) recycled.
- Including the following **photo** requirements:
 - For recycling of a single system, require a photo of the old unit at the recycling facility.
 - For bulk recycling, photos of the old unit can be taken at the warehouse of the scheme participant.

These changes would ensure greater confidence that the old units are indeed being recycled appropriately without the additional hassle of trying to provide recycling documentation.

Proposed record-keeping requirements for product sizing and the pricing of upgrades

GET shares the commissions concern around the improper sizing of RCACs and supports additional controls on system sizing.



We urge the commission to consult widely with the industry to ensure the sizing guidelines are fair and reasonable and that any additional evidence requirements are not too administratively burdensome for scheme participants.

GET is unclear about the intention of the proposal to change the Assignment Form to list the total purchase price and price paid as this information is easily sought from the tax invoice and believes this change redundant.

Replacement of existing gas heating ductwork issue

We are pleased to see this matter be addressed in this consultation and appreciate the depth of analysis and investigation undertaken by the commission.

GETs experience has shown that while the vast majority of ducted RCACs are installed with new ducting, we feel there may be room for nuance in applying rules around the use of existing ducting as there will be circumstances where the existing ducting is undamaged, meets Australian Standards and is suitable for connection to the new RCAC.

As such, a better approach may be to apply a time limit on reusing ducting (for instance, reused ducting must not be more than 5 years old) and have the installer sign an additional declaration confirming the existing ducting is suitable for reuse. This could be evidenced by photos showing a date (perhaps if one is listed on the decommissioned system), tax invoice or safety certificate for the previous installation. This subtle change would ensure that compliant ducting is not sent to landfill and contributing to other environmental problem.

However, if just having one rule reduces confusion and improves outcomes for energy consumers, we are supportive of a blanket ban on reusing existing ductwork.

Final Comments

As one of the largest and longest standing VEU program participants we take very seriously our responsibility to ensure the health and longevity of the VEU program. We believe the proposals made in this document are reasonable, will benefit all VEU participants and help improve the performance of the whole VEU program.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Spencer Skehill', written over a white background.

Spencer Skehill
Research and Development Manager – Deemed Activities
Green Energy Trading

About us

Green Energy Trading is one of Australia's largest environmental certificate agents and is committed to making incentives for renewable energy and energy efficiency activities more accessible to Australians.

Green Energy Trading was established in 2007 and supports its clients in accessing incentives available through market mechanisms, including the Victorian Energy Upgrades scheme (Victorian Energy Efficiency Target), NSW Energy Saving Scheme (ESS) and the federal Renewable Energy Target.

Green Energy Trading is an Accredited Provider (AP) that creates, purchases and trades environmental certificates for customers of solar PV, solar hot water, small wind and other renewable energy, commercial lighting and other energy efficiency projects under the PIAM&V and PBA methods.

In addition to certificate creation, a large part of our involvement in the VEU scheme has been as a knowledge leader providing education and information on the VEU scheme and how it works to end consumers and

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installers. We also work with the Energy Savings Industry Association (ESIA), DELWP and the ESC on policy and compliance issues that improve scheme integrity.