

## Q 1 - 5

I think the updated requirements are reasonable, save the requirement for a geo-tagged photo of "the existing product ready to be removed from the consumer's premises."

It is my view that this doesn't achieve anything. As an AP, I already live in fear that claims will be rejected for minor reasons. I believe the ESC's requirements should be kept to a minimum while still ensuring that the VEU's goals are met.

If an installer wants to leave behind an old product, they are clearly falsifying the recycling receipt. If they are committed to falsifying the recycling receipt, they can easily take a photo of the old product ready to be removed, but still leave the old product behind.

We're already providing a photo of the unit decommissioned and a recycling receipt. This extra requirement doesn't achieve anything.

## **Q6 Do you have any feedback on the proposed record-keeping requirements for space heating and cooling activity in relation to appropriate sizing of products? Do you consider the requirements to be practical and achievable? If not, why?**

I strongly object to the suggested record-keeping requirement. I most strongly object to the requirements outlined in Table 7. To go through each and every room and require the installer and consumer to sign will be a significant administrative burden.

The paperwork required to comply with the VEU obligations, particularly Activity 6, is already too onerous. It comes with a significant administrative cost to installers which is passed on to customers. I note one of the key aims of the VEU is to reduce the costs of electrification to customers. If requirements are continually increased, any benefit from rebates will be eroded by administrative costs.

Instead, I suggest the VEU let installers make appropriate recommendations. I understand this comes with a risk that installers will oversize recommendations in order to increase the cost of installation and their margins. I should think any of these problems can be discovered under audits. If installers are oversizing installations, they can be penalised and possibly removed from the program. I think this is a more practical and 'lighter touch' approach.

With the amount of paperwork we are required to send customers, I am confident the vast majority of customers don't read it anyway. It's too much. In many cases, especially water heating, I'd estimate 50% of customers don't choose a heat pump that is appropriately sized for them, according to the guide. The guide is just that, it's a guide. It should not be treated as a one-size fits all. There are many variables that affect the right size for a customer and it's my opinion the guide is wrong in many cases. It is my feedback that customers and installers should be given free choice, with penalties for those installers that are demonstrably misleading customers for their own gain.

## **Q7 Do you have suggestions for alternative or additional forms of records that could be provided to evidence that products installed have been appropriately**

**sized to meet the heating and cooling needs of the consumer having regard to the consumer's premises?**

I suggest the ESC should be working hard to reduce the paperwork requirements of claims, not making them more onerous. The paperwork for claims is already too time consuming, difficult and there is always a fear that something is missed. Increasing paperwork requirements should not be used as a tool to remove bad actors. Bad actors will continue to be bad actors, while good actors will be left with increased administration costs.

**Q8 Do you have any feedback on the proposed record-keeping requirements for the space heating and cooling activity in relation to the pricing of upgrades? Do you consider the requirements to be practical and achievable? If not, why?**

I have no problems with this suggestion. It is very easy to comply with and indeed is required for water heating as part of claiming Solar Victoria rebates.

**Q9 Do you have a position on whether installers should be required to replace existing gas ductwork and duct fittings when upgrading from a ducted gas heater to ducted RCAC under the VEU program?**

Again I think we need to let installers do the right thing, and penalise those installers that mislead customers. Ductwork should be replaced where possible, but it's not always practical. I strongly believe installers should not be required to replace ductwork, but perhaps they can be encouraged or need to provide a reason where the ductwork is not replaced. For example, we currently have a quote for a customer in Kensington where we will replace the ductwork where we can access it (in the roof). But the ducts to the downstairs part of the house are built into the house. Requiring us to replace those ducts will be very expensive, messy and likely undo any of the cost reductions afforded by the VEU.