



Ecovantage
58-62 Rupert St
Collingwood VIC 3066
e: info@ecovantage.com.au
p: (03)9015-6888

Monday, December 12, 2011

Dear Sir/Madam,

RE: ESS Consultation Paper and Draft Rule dated November 2011

Ecovantage welcomes the opportunity to provide comments on the ESS Consultation Paper and Draft Rule.

We wish to make a formal submission with respect to Item 8 - *the removal of sales as an eligible lighting replacement activity where the activity requires an electrician.*

Ecovantage believes that there are appropriate lighting products in the market place that satisfies the requirements outlined in Appendix 3 of the Guide to using Savings Factors in the Deemed Energy Savings Method. This End-User Equipment falls under Table 3 but importantly, does **NOT** require an electrician for installation.

Secondly, given the cost of these quality LED products (>\$50 per light), it is not conceivable that householders will purchase and yet not install these products; therefore, there is minimal risk that the energy savings will not be created.

On this basis it is our proposal that the proposed changes should take into account products such as quality self-retrofitting LED lights and continue to keep them as an eligible lighting replacement using the default Savings Factor.

With kind thanks for the opportunity to make a submission.

Dinh Truong
General Manager – Residential Services