



Energy Savings Scheme Rule Change Consultation

Department of Trade and Investment

GPO Box 3889

Sydney NSW 2001

Dear Sir/s,

Firstly, thank you for the opportunity to discuss proposed amendments in relation to the proposed rule change regarding showerheads.

BACKGROUND

- PerfectFlow Technology Pty Ltd (PerfectFlow) is an Australian company that has developed a unique range of water saving showerheads specifically for the NSW Energy Saving Scheme (ESS).
- The traditional standard showerhead uses approximately 9-12 litres of water per minute (so called low flow?), whilst the PerfectFlow showerhead uses 6 litres per minute.
- For a family of four switching from a standard showerhead to a PerfectFlow showerhead, this would represent the follow savings:
 - approximately 50,000 litres of water per year; A
 - approximately \$100 per year in the cost of water; A
 - approximately \$200 per year in the cost of electricity to heat water; and A
 - approximately 7 tonnes of carbon from being released into the atmosphere. A



- PerfectFlow have been active in working with the NSW Government on this scheme and have made various submissions regarding the Energy Savings Certificates (ESC's) to be attached to water saving showerheads.
- Perfectflow have been the preferred supplier to registered and accredited companies involved in the installation of showerheads as an approved Residential Energy Saving Activity (RESA) under the NSW ESS.

ISSUES

- The New South Wales Government has made changes to the Energy Saving Scheme (ESS) to take affect 22nd December 2011 which will rule out the possibility of any further showerhead installations under the NSW ESS.
- That the Scheme Administrator is unsure whether a household will install a showerhead once they receive it. *(Can only occur when showers are sold)*
- Abolishment of lowest cost form of abatement
- Accredited Certificate Providers have not been given a reasonable amount of time to transition themselves into new Residential Energy Saving Activities and have invested heavily in the scheme and are very experienced.
- Bad Press because of disgruntled ACP's who were suspended from the scheme

RECOMMENDATIONS

- Re-assess the impact of abolishing showerhead retrofitting under the ESS. Transition Period extended to June 30th 2012.



- Take into consideration that Accredited Certificate Providers (ACP's) with past non-compliance issues have been suspended by IPART and only the very best operator's still exist.
- Abolish 'sales based' certificate creation. *(No ACP's are doing this anyway!)*
- Take into consideration that Auditing procedures have continually been improved and adhered to by the remaining ACP's in the scheme.
- Consider 'setting the record straight'. A recent report in the Sunday Telegraph Newspaper was a disgraceful and misrepresented overview of our scheme. It was an affront to all of the people concerned that have worked so hard to make the ESS the overall success that it is. A response would have cleared the air and let the general public know that we are not the "New Pink Batts Scheme" whatsoever.
- Consider the possibility of allowing 'commercial only' installations for showerheads. i.e., hotels, nursing homes, businesses. *(Most have 'hand held' shower fittings. This segment of the market remains largely untouched and products have only just been finalised for this and significant capital has been utilised!)*

With regard to the last recommendation (*see above*), our company invests substantial monies to ensure to the best of our ability that the registered ACP's have a ready and available level of inventory available to them. In fact, we have recently invested in inventory in the range of \$2-250,000 which is separate to the investments made in tooling, testing and registration for new products, specifically for the ESS. What I would like to be considered is that we make these products specifically for the ACP's registered under the NSW ESS. All products are in a 'BULK' format meaning that they are not able to be sold via the usual retail outlets such as Bunning's/Mitre 10/ Reece. They are manufactured in accordance with reasonable forecasts that are made in conjunction with the registered ACP's. It is not reasonable to suggest that stakeholders only have one month to transition.



In early January, we will have available a hand held version of our shower product which all ACP's have been looking forward to receiving as there are many opportunities for this to be successful in the marketplace. To date, no ACP's have been installing hand held showers. This has been a missed opportunity that could generate a lot of activity. The more experienced ACP's in the marketplace are already achieving very high rates of compliance. The issue is not the compliance requirements whatsoever.

Please help us help you make a fair and equitable determination with regards to this matter or small business will suffer rather than prosper under the auspices of the NSW ESS. Any material changes will have a dire effect on the small micro industry within which we all work, with great pride I might add!

Kind Regards,

A handwritten signature in cursive script that reads "Lindsay Nordstrom".

Lindsay Nordstrom
Managing Director
Perfectflow Technology Pty Limited

W: www.perfectflow.com.au

Saving the EARTH One Shower at a Time™



For the NSW ESS;

