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To whom it may concern

**RE: Victorian Energy Efficiency Target Amendment (In Home Displays) Regulations 2012 DRAFT Nov 2011**

The Alternative Technology Association (ATA) and the Moreland Energy Foundation Ltd (MEFL) welcome the opportunity to comment on the draft Victorian Energy Efficiency Target Amendment (In Home Displays) Regulations 2012 (the Draft Regulations).

We are concerned, however, that the draft regulations were released so soon after the conclusion of the initial consultation on the inclusion of IHDs into the VEET scheme, and that as a result some of the valuable input provided under that process may not have been considered. This submission re-emphasises a number of comments included in our original submission, which do not appear to have been addressed in the draft regulations.

**Minimum Requirements for IHDs**

It is important that the information the IHDs are presenting to consumers is consistent across the approved IHDs. ATA and MEFL are concerned that the Draft Regulations only impose minimum information standards for non-Zigbee specification compliant devices, and not for Zigbee specification compliant devices.

In Part A, XXB (a) (iii) of the Draft Regulations the requirement is outlined for the IHD to be “capable of displaying to the consumer, the tariff in c/kWh and the total cost of electricity used for the period displayed”. In contrast, there does not appear to be any corresponding requirement for Zigbee certified IHDs in Part A, XXA (a).

To ensure that IHDs have the expected energy efficiency outcomes it is important that the Regulations enforce the same minimum standards on all approved IHDs.

**Accuracy Considerations**

As outlined in our joint submission to the consultation paper on the inclusion of IHDs in the VEET scheme, and reflected in the *Consumer HAN Principles for BP03A ‘Appliance registration’ and BP15 ‘HAN [customer] messaging’* prepared under the National Smart Metering Program (copy available on request), ATA and MEFL would like to reinforce the need to ensure that consumers with IHDs have access to accurate total cost information. Consumers will be relying on their IHD device to assist in their personal energy consumption and management decisions, and therefore it is important that:

- Current, accurate tariff data is automatically loaded onto IHD devices
- Fixed charge data is included in total cost estimates on IHD devices

Without these two conditions the total cost estimates have the potential to increase complaints with electricity retailers when there is a difference between the total cost estimates from IHDs and the actual amount billed to consumers.

The two conditions outlined above need to be included in the Regulations as minimum specifications for all IHD devices.

### **Consumer Protection and Minimum Information Standards**

The initial IHD consultation paper<sup>1</sup> states that the IHD registration flow requires that an “AP Provides Customer with Information to comply with Minimum Information Standards”.

The Draft Regulations do not make any reference to these Minimum Information Standards, nor do the standards appear to be publicly available. ATA and MEFL are concerned that customers may be disadvantaged and expected energy savings not achieved unless APs are required to properly educate consumers in relation to their installed IHD.

To ensure consumer protection, and the effectiveness of IHDs within the VEET scheme, the Minimum Information Standards should be included in the Regulations before they are due to commence, and should be developed through a public consultation process involving particular consultation with consumer representatives.

### **About ATA and MEFL**

The ATA is a national, not-for-profit organisation representing consumers and communities in the renewable energy and energy efficiency marketplace. The organisation currently provides service to approximately 6,000 members nationally who are actively engaged with small, medium and large scale renewable energy projects, energy efficiency and the national electricity market.

MEFL is an innovative not-for-profit organisation established by the City of Moreland in 2000 to reduce greenhouse gas emissions. MEFL works within and beyond the Moreland community to implement a range of energy efficiency programs, including behaviour change programs, research and demonstration projects and advice and information services.

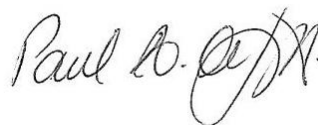
### **Further Contact**

For further information about the contents of this submission, please contact Ian Porter at ATA [ian@ata.org.au](mailto:ian@ata.org.au) or Eli Court at MEFL at [eli@mefl.com.au](mailto:eli@mefl.com.au).

Yours sincerely



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<sup>1</sup> Department of Primary Industries IHD Inclusion into ESI Scheme, Page 115,  
<https://www.veet.vic.gov.au/Public/Pub.aspx?id=198>