



**energy savings**  
Industry Association

**ESIA Submission:  
NSW Government  
Energy Security Safeguard  
IPART – Operational changes to scheme  
participant compliance processes**

19 April 2024

Submitted to Independent Pricing and Regulatory Tribunal (IPART)  
New South Wales Government, [essregulator@ipart.nsw.gov.au](mailto:essregulator@ipart.nsw.gov.au)

Energy Savings Industry Association  
Suite 2, Ground Floor, 109 Burwood Rd, Hawthorn 3122  
[www.esia.asn.au](http://www.esia.asn.au)  
ABN 52 166 026 766

## Table of Contents

1.	Introduction .....	3
2.	Responses to consultation questions.....	4

# 1. Introduction

The Energy Savings Industry Association (ESIA) welcomes the opportunity to provide this submission to the New South Wales Government for the **NSW Energy Security Safeguard Consultation: Changing audit conditions and increasing certificates volumes** which commenced on 4 March 2024. This consultation is being managed by the Independent Pricing and Regulatory Tribunal (IPART).

The ESIA has referred to

[https://www.energysustainabilityschemes.nsw.gov.au/sites/default/files/cm9\\_documents/Operational-changes-to-scheme-participant-compliance-processes-Consultation-Paper-March-2024.PDF](https://www.energysustainabilityschemes.nsw.gov.au/sites/default/files/cm9_documents/Operational-changes-to-scheme-participant-compliance-processes-Consultation-Paper-March-2024.PDF)

and some members attended a public online information webinar.

## Next steps

IPART's website states that it will consider all feedback before finalising its compliance processes and publishing updated guidance and will release a package of guidance documents in May 2024.

## About ESIA

The Energy Savings Industry Association (ESIA) is the peak national, independent association representing and self-regulating businesses that are accredited to create and trade in energy efficiency certificates in market-based energy savings schemes in Australia. These activities underpin the energy savings schemes which facilitate the installation of energy efficient products and services to households and businesses. Members represent most of the energy efficiency certificate creation market in Australia. Schemes are established in Vic, NSW, SA and ACT. Members also include product and service suppliers to accredited providers under the schemes. As well, the ESIA represents member interests in national and state initiatives that include energy efficiency and demand reduction, such as the Federal Government's Carbon Farming Initiative energy efficiency methods and the NSW Peak Demand Reduction Scheme.

## Further engagement

We welcome the opportunity to discuss this submission further, please contact the ESIA Executive Director at [comns@esia.asn.au](mailto:comns@esia.asn.au).

**This submission can be made public.**

## 2. Responses to consultation questions

1. **Does the move to providing gross electricity market purchase data present any issues or challenges for your business?**

Annual reporting is too delayed for the ESS following the compliance year. This is not helpful for keeping all stakeholders informed and can result in missed market opportunities.

2. **Do the revised audit requirements present any issues or challenges for your business?**

Not applicable.

3. **Would you like to see changes or improvements to the compliance timeline? Do you support the combined ESS and PDRS compliance cycle? Does the existing compliance timeline present any issues or challenges for your business?**

ESIA members have raised concerns.

### **Background on compliances dates for the ESS and PDRS**

1. Due to the COVID-19 pandemic, the ESS compliance date was pushed back to allow obligated parties more time to meet their requirements.
2. This change was not reversed after the pandemic.
3. The PDRS first compliance year was launched in 2022-2023 and the compliance date was not initially aligned with the ESS.
4. The PDRS compliance date was then adjusted to align with the ESS date, even though it has not been re-adjusted back to when it had been pre-COVID.

### **Current state of play proposed by IPART to be continue – unattractive features from and ACP perspective:**

- The compliance report is released for the ESS 1.5 years after the compliance period. Vital market information is not made available to the market in a timely manner.
- The compliance report dates for the PDRS are ok as they are and the ESIA appreciates that they cannot be brought into line with the ESS pre-COVID dates as June-July is too soon after the 31 March compliance period end date of the PDRS.

### **Impacts on obligated parties:**

- Obligated parties are accustomed to dealing with varied compliance calendars, for example the RET which is based on calendar year.
- The RET reporting schedule, in relation to the ESS, means that obligated parties have all the information they need to be able to report in a timely manner **even if** the dates were to be re-adjusted back to pre-COVID dates.

---

**For more information** regarding this submission, please email ESIA Executive Director, [comns@esia.asn.au](mailto:comns@esia.asn.au)