

**From:**  
**Sent:**  
**To:**  
**Subject:**

Hello ESS,

Thank you for providing us with the opportunity to provide feedback on the proposed changes to PIAMV Method Requirements.

Please find our comments and answers to the questions below.

Best regards,

Waven

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**Dr. Waven Pyke** | Energy Efficiency Consultant (CMVP)



### **Question 1. Northmore Gordon's Comments**

We agree with the proposed content outlined under Section 4.2 of the Consultation Paper.

We recommend that the Preliminary M&V Professional Report should be completed before the Implementation date. We suggest that this report be submitted to IPART within one month after the Implementation date.

### **Question 1. Northmore Gordon's Answer**

In addition to the proposed contents outlined under Section 4.2 of the Consultation Paper, the Preliminary M&V Professional Report should confirm that the M&V Plan contains:

- site description: key functions, key product outputs of the site
- a discussion on interactive effects of the EUE, how significant they are, how they will be accounted for in calculations
- *optional*: energy consumption data and baseline energy model(s) as evidence to the appropriateness of selected independent variables and site constants.

### **Question 2. Northmore Gordon's Comments**

We agree with the general requirement proposed in Section 2 of the Consultation Paper.

### **Question 2. Northmore Gordon's Answer**

For commercial buildings, the performance of EUE can be affected by weather data due to thermal mass of buildings. We recommend that 12 months should be the minimum time required for energy models.

For industrial applications, thermal mass usually has minimal effect on the heating and/or cooling loads that is affected by weather. We recommend that the duration of the measurement periods should be flexible as long as Effective Ranges requirements are met.

Regression models with appropriate independent variables would be good evidence and justification of duration of measurement periods.

### **Question 3. Northmore Gordon's Comments**

Given the inconsistencies in weather patterns, and continual unusual climate changes, we urge IPART provide guidance and rules on what data should be used for a "normal" year. The "normal" year can be an average of 1, 2, 3 years of weather data (or longer), or it can be a specific year (e.g. 2018), or another option from an expert.

For Section 3.3(a), we recommend against requiring maintenance and use as per manufacturer's instructions. Manufacturer's requirements tend to be highly conservative, and occasionally inefficient. We do recommend requiring usage to within equipment design parameters, and regular maintenance of the equipment.

### **Question 3. Northmore Gordon's Answer**

For industrial sites, changes to sites (including production), is a normal part of operations. Major changes are accounted for in non-routine adjustments. It is important that IPART remain flexibility in choosing of "normal" for industrial sites, as it is highly variable depending on the site and industry.

### **Question 4. Northmore Gordon's Comments**

Please clarify and document if it is a requirement that the same M&V Professional write both the Preliminary M&V Professional Report and the M&V Professional Report.

### **Question 4. Northmore Gordon's Answer**

No additional comments. Please refer to our comments and answer to Question 1.

### **Question 5. Northmore Gordon's Comments**

We strongly prefer that minor changes to energy use patterns on site, (e.g. ones that are less than 10%) be allowed as a part of the M&V process.

If minor changes are not allowed, then it would discourage the Energy Saver and/or Contractor to achieve additional savings via minor changes to the site. Discourage minor changes to improve energy efficiency would be counter to the intention of the legislation.

We urge IPART to develop a formal mechanism to allow the ACP to adjust the nomination form prior to the implementation date so that changes to the EUR to the site can be updated in the nomination form.

#### **Question 5. Northmore Gordon's Answer**

No additional comment.

#### **Questions 6 & 7. Northmore Gordon's Comments**

We strongly object to the statistical requirements proposed in Table 1 of the Consultation Paper. These requirements are suitable as recommendations, but not appropriate as requirements. These statistical requirements would result in many projects being ineligible to create certificates, even though significant savings have been determine.

We strongly support the current approach where the accuracy of the model is reflected in the savings accuracy and the accuracy factor.

#### **Questions 6 & 7. Northmore Gordon's Answer**

No additional comments.

#### **Question 8. Northmore Gordon's Comments**

Statistical uncertainty analysis is a highly complex topic, it is a multi-faceted topic, with multiple subtleties, high-subjective, and prone to error.

We strongly support the current approach where the accuracy of the model is reflected in the savings accuracy and the accuracy factor.

#### **Question 8. Northmore Gordon's Answer**

IPART should provide more detailed and specific guidance on how uncertainty should be determined. The guidance should be a commercially appropriate methods with equations and worked examples.

#### **Question 9. Northmore Gordon's Comments**

No comments.

#### **Question 9. Northmore Gordon's Answer**

No comments



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