Response to submissions



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Changes to implementation data – What we heard

15 June 2023

Thank you to everyone who provided a submission. We have considered the feedback provided and this has informed our final approach to implementing this change.

This paper summarise outcomes form our consultation the timing and management of a change to include product details with implementation data.

We received 4 written submissions from Accredited Certificate Providers (**ACPs**). A summary of these submissions and our response is provided below and in **Table 2**.

1 Outcomes

The Scheme Administrator has decided to lengthen the notification period to 6 weeks as a result of the submissions. In addition, we have slightly adjusted the data fields to remove the requirement for refrigerant for water heaters. The final list of data that will be collected is presented in **Table 1**.

We will be developing this functionality in TESSA in July and currently expect to release this change on 1 August 2024. A csv file detailing the specifications for each field to allow stakeholders to prepare for this change will be released closer to launch. We will keep stakeholders updated as the exact start date through broadcast emails and website updates.

We have taken on board the request to include the product details in the public facing certificate data. Whilst it is not possible to include this in the initial release, due to other projects in TESSA, this has been placed in line for development at a later date.

2 Key insights from feedback

- Respondents were supportive of Scheme Administrator collecting product data.
- Some respondents considered that some data fields were not essential and placed additional burden on ACPs.
- Stakeholders would like to see some additional functionality or features in TESSA as a flow on effect from product data collection. This included:
 - Product information is displayed on the publicly availably Register of Certificates
 - Functionality for TESSA to calculate energy savings and ESCs from product data

IPART acknowledges the Traditional Custodians of the lands where we work and live. We pay respect to Elders, past, present and emerging. We recognise the unique cultural and spiritual relationship and celebrate the contributions of First Nations peoples.

Table 114 Final product data for inclusion in implementation data

Product	Scheme	Method	Activity	Data to be collected	Comment
Hot water heaters	ESS	HEER	D17, D18, D19, D20.	BrandModel Number	Fields will be verified against public list in TESSA (must match) Will allow for multiple products (model
			D21		numbers)
	ESS PDRS	IHEAB RDUE	F16, F17 WH1	WH1 • Model number TESSA • Number of units installed Will all	Fields will be verified against public list in TESSA (must match)
					Will allow for multiple products (model numbers)
Air conditioner	ESS	HEER	D16	BrandModel number	Free form fields
				 Refrigerant New or replacement Number of units installed 	Will allow for multiple products (model numbers)
	ESS PDRS	IHEAB RDUE	F3/F4 HVAC1/ HVAC2	BrandModel numberRefrigerantNew or	Free form fields Will allow for multiple products (model numbers)
				New of replacementNumber of units installed	
Refrigerated display	ESS	IHEAB	F1.1	BrandModel number	Free form fields
cabinets				 Refrigerant Number of units installed	Will allow for multiple products (model numbers)
Refrigerated display cabinets	ESS PDRS	IHEAB RDUE	F1.2 RF2	BrandModel number	Free form fields
				 Refrigerant Number of units installed Product class of removed equipment Product class of installed equipment 	Will allow for multiple products (model numbers)
Pool pumps	ESS PDRS	HEER RDUE	D5 SYS2	BrandModel number	Free form fields

Note: Exact requirements for the CSV upload will be released closer to launch

Table 222 Summary of stakeholder feedback

Question	Feedback summary	IPART response
General comments	 All respondents supported the collection of product data, including brand and model number of products (with one exception as noted below). 	• We appreciate the support of ACPs in implementing this change.
Is a lead time of 4 weeks sufficient to adapt your business processes to the updated implementation data requirements. If not please provide an alternative transition time and explanation of why you need additional time	 The majority of respondents felt that a lead time of 4 weeks is sufficient. One respondent considered that at a minimum of 6 weeks lead time is required. 	 We will provide a minimum 6 weeks lead time for the change. We have published the technical specifications for the product data. We will be developing this functionality in TESSA in July and current expect to release this change on 1 August 2024. We will keep stakeholders updated as the exact start date of this change through our regular broadcast emails and website updates.
Is there anything additional that we need to consider for this change or have missed?	 One respondent did not support collection of product brand as this can be obtained from the GEMS list One respondent noted that refrigerants is not a valid field for solar hot water heaters (no refrigerants used) Two of the respondents did not support the inclusion of "refrigerant" data as they considered it unnecessary and burdensome to ACPs for the following reasons: For heat pump hot water heaters, refrigerant data is included in the IPART accepted product list For air conditioners, IPART should import this information from the GEMS register For RDCs there is no public data and each ACP would need to compile their own database. 	 We consider the product brand necessary in case there are errors in the Product Model numbers provided. We have decided that we will not collect refrigerant data for hot water heaters. We will collect refrigerant data for air conditioners and refrigerated display cabinets for the following reasons: The GEMS register has more than 8,000 models for each product type. It would not be a good use of IPART's limited resources to get data for this number of products, when only a selection are used in the Safeguard. At this stage, product brand and model cannot be verified in TESSA, and there is a risk that we will not be able to confirm the refrigerant data. Refrigerant data provides useful information on type and relative cost of products, and will help inform decision making and compliance efforts.
Additional feedback	 One respondent requested that the product information is published on the publicly available Registry of Certificates including, quantity of certificates per activity (e.g. F16 or F11) Postcode Brand and Model number This respondent indicated that the above data would assist ACPs, installers and prospective third parties to make informed decisions about the market. 	 Quantity of certificates per activity and postcode are included in the recently published lists on TESSA. We are always working to enhance TESSA and will consider adding the brand and model number to this public list at a later date.

Question	Feedback summary	IPART response
Additional feedback (cont'd)	One respondent suggested that TESSA should be able to calculate energy savings and ESCs for each implementation.	 It is currently not technically feasible to include this type of enhancement to TESSA. It remains the ACP's responsibility to calculate energy savings for each implementation.