

29 March 2019

Victorian Energy Upgrades Essential Services Commission Level 37 2 Lonsdale St Melbourne VIC 3000

RE: Review of Victorian Energy Efficiency Target Guidelines Draft

Lighting Council Australia (LCA) welcomes the opportunity to comment on the VEET Guidelines Draft produced by the Essential Services Commission.

LCA supports changes to the Scheme to allow products on the GEMS Register and National Electricity Market Load Tables for Unmetered Connection Points to be installed under the VEU Program. These changes will reduce the administrative burden for reputable suppliers of quality lighting equipment who also wish to supply product for use in the Scheme.

Currently, the draft Guidelines dictate that the Commission will "periodically update" the VEU Register of Products to include products from the National Electricity Market Load Tables for Unmetered Connection Points. LCA suggests that a frequency for this update is included in the Guidelines. Previous representations by the Commission suggested Accredited Persons should request specific products are added to the VEU Register by Commission staff if they were to be used in upgrades. Both mechanisms should be available for the addition of these products to the register and clarity is required for suppliers of lighting equipment and Accredited Persons.

LCA is supportive of changes to the scheme that reduce the burden of compliance on suppliers while maintaining the integrity of products used in the scheme. The harmonisation of registration requirements and reciprocal recognition of other product registers from similar schemes in other jurisdictions would be a positive step.

Your sincerely,

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