

From: Leea Energy <[REDACTED]>
To: veet@esc.vic.gov.au
Cc: jeff.cefai@esc.vic.gov.au
Date: 09/01/2019 12:16 PM
Subject: 21A consultation submission

Hello VEET

I would like to enter a submission re the consultation currently open on whether Schedule 21A should be 'Electrician only' or 'retrofitters'.

Firstly for a bit of background, our Electrical company is a 'Registered Electrical Contractor' and uses A Grade Electricians. This gives us a good understanding of providing accurate details as to why we think it should remain 'Electrician only' for the continued safety of all participants.

The numerous reasons for this I will list below :-

- changing CFL's to LED bulbs could seem to be a simple process for outsiders, however having witnessed over a long period of time the different fittings that CFL's are installed in, I believe that this assumption is to be inaccurate.

Many CFL bulbs are installed inside actual light fittings. Light fittings that were only allowed to be installed by a 'Licensed Electrician'. In some cases these fittings once the cover is removed to access the bulb, the terminal block holding the electrical wiring is present on the installer side of the fitting. This is not visual to the consumer or installer until the cover is removed to access the bulb. If unlicensed 'Retrofitters' were able to undertake this activity on some light fittings they would find themselves in a position of potentially suffering electrocution.

- in many light fittings, whether be simple batten holders or oyster fittings as mentioned above. It is not simple to say that by turning off the light switch, the light fitting is 'dead' and therefore safe to work upon. In the majority of older houses and a number of newer ones, at every light fitting there is a 'HARD ACTIVE' at the light fitting. This means that even though the light switch is turned off, there is still 240Volts active at the light fitting in either a connector or a looping terminal. Without even knowing this a 'Retrofitter' would expose themselves to a massive risk of Electrocution.

- there will definitely be many light fittings across Victoria that are loose, barely being held into the ceiling. Once the installer touches the fitting they may become even more flimsy or even fall out of the ceiling. Only a 'licensed electrician' is qualified and safe to reinstall in such situations. Once again with the movement of the fitting, wires may become loose or break (is often the case with old wiring) and need to be re-terminated by a 'licensed Electrician'. It is simply too unsafe for 'retrofitters' with no experience whatsoever, most probably backpackers to be put in this situation. If a 'licensed Electrician' is onsite this can be rectified in the one visit.

- 'Retrofitters' will not have insulated pliers, screwdrivers, fibreglass ladders, safety boots, gloves etc to undertake Schedule 21A safely and not expose themselves to Electrocution.

- They won't have the knowledge of the dangers of Electricity. This is taught currently throughout 3 years of an apprenticeship at school, 4 years of being an apprentice onsite with a master and then many more years of experience in the field as a 'licensed electrician'. It cannot be taught in a 45 minute in-house training session or a 1.5 day Water Efficiency and Electricity course.

- QUITE SIMPLY ' RETROFITTERS' WILL NOT RESPECT ELECTRICITY AND THE EXTREME HAZARDS THAT COME ALONG WITH IT, AS THEY KNOW NO BETTER and are only thinking about installing their next globe and pay check .

- consumers appreciate the fact that they have a ' licensed electrician' entering their house or business to undertake the activity. If anything goes wrong then the issue can be resolved in the same visit. Also the chances of anything going wrong would be substantially reduced by the sheer fact that there is an 'Electrician ' in their house as opposed to an inexperienced ' Retrofitter ' .

- many light fittings need to be handled gently and with a special touch. Especially when tightening up glass fittings etc. As apprentices we have broken a few but in time and experience you learn how tight and delicate some light fittings need to be handled. Electricians have an understanding of this.

- a large percentage of installs will be normal batten holders. Some will be straight forward. Others will see the base of the existing lightbulb broken and stuck inside the light fitting. These would need to be removed with insulated equipment and in a way that does not add further damage to the existing batten holder (or even batten holder replaced). In the case of 'Retrofitters' this could expose them to the further chance of Electrocutation.

- allowing the use of 'Retrofitters ' in 21a could see in some instances AP's having 20-40 Retrofitters working for them on any one day. Keeping all of these workers safe each day, protecting them from the risk of many potential electrical hazards onsite would be extremely difficult. If an Electrical Company was to have this many staff on just one building site, they would have OHS representatives, Union delegates, Site supervisors etc ensuring the safety of all of the electricians. How can this safety level be maintained when in this instance there could be 30 inexperienced retrofitters going to 15 homes a day which means 450 worksites and so many potential hazards.

Running an Electrical company, everyday I have to have policies and procedures in place to ensure that my employees remain safe. Apprentices are in the care of A grade Electricians and work sites need to be a safe environment to ensure that everyone returns home to their families at night time. IMO opening up Schedule 21A accredited companies to allow the use of 'Retrofitters' will allow short cuts to be taken, Electricity to be disrespected and the chances of someone being Electrocutated will increase severely.

I am sure that some may say that this is being too conservative and the chances of this occurring are slim. However I say that even if this happened once in 4 million homes, then this would be one time to many. The fact that it could occur once only is enough for me to say that it needs to be 'Electrician Only'. I know that there will be many broken fittings, bulbs snapped off in batten holders, exposure to hard actives (240v) at light fittings, broken electrical wiring , water inside fittings, aluminium ladders being used (not fibreglass),

uneducated installers, installers who cannot read English warnings on fittings the list goes on and on.

The VEET scheme has come along way over the past decade. Safety, compliance, branding are all as strong as it's ever been currently. Let's not regress. Let's be even stronger and ensure the quality of trademanship , customer experience, installer safety and VEU reputation remain at the forefront of all energy schemes across the nation.

Kind regards

Lukas Slater
Managing Director
LEEAA ENERGY
P 1300212759
M 0434438600
F (03) 97628617