

# energymakeovers

Suite 105 - 9/11 Claremont Street • South Yarra, VIC 3141

Essential Services Commission

VEU division – Activity 21A non omni-directionality transition period

Level 37, 2 Lonsdale St Melbourne VIC 3000

Via email – [veu@esc.vic.gov.au](mailto:veu@esc.vic.gov.au)

18 April 2019

## **Re: Non omni-directional lamp transition period for activity 21A**

Thank you for the opportunity to respond to the above-mentioned consultation paper.

Energy Makeovers believes that lamp manufacturers and APs must have adequate opportunity to install all lamps ordered prior to 10 December 2018 for installation under activity 21A(18). These lamps were designed and manufactured to achieve the minimum requirements that existed prior to 10 December 2018. Since these lamps were manufactured there have been 2 significant changes introduced by ESC:

1. lamps must achieve new omni-directional specifications
2. lamps must be installed by A grade electricians.

The first of these new requirements resulted in almost all lamps ordered prior to 10 December 2018 being unable to be approved under activity 21A(18). To address this, ESC has allowed lamps that meet all 21A(18) requirements except non-omni-directionality to be installed in the period up to 30 June 2019. Energy Makeovers believed this to be a sensible decision because all non omni-directional lamps ordered prior to 10 December 2018 were expected to be consumed by 30 June 2019 and all 21A(18) lamps ordered since 10 December 2018 meet the new omni-directionality requirement.

However since then, the ESC has introduced the 2<sup>nd</sup> new requirement resulting in a quantum reduction in the volume of installers available to perform activity 21A(18) and a consequent quantum reduction in 21A(18) lamp installations. Energy Makeovers now believes that it will take much longer for APs and manufacturers/distributors to consume the non omni-directional 21A(18) lamps.

# energymakeovers

Suite 105 - 9/11 Claremont Street • South Yarra, VIC 3141

Energy Makeovers commends ESC in considering extending the period that non omni-directional lamps can be installed under activity 21A(18) and believes the period of the extension must be adequate to allow all stock ordered prior to 10 December 2019 to be installed. It is our view that an extension of 3 months will be adequate resulting in the period being extended to 30 September 2019. As all lamps manufactured since 10 December 2018 meet the new omni-directionality requirement there is no opportunity for any party to game the extension.

Please do not hesitate to contact me if you would like to discuss any matter raised herein.

Yours Sincerely



Bruce Page  
Director