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To: <veu@esc.vic.gov.au>
Date: 16/12/2018 08:17 PM
Subject: RE: Consultation: Training and licensing requirements for activity 21A

Hello, RE: Consultation: Training and licensing requirements for activity 21A

Regardless of what MST requirements are (electricians only or not) the new 21a will lead to create extreme numbers of VEECs. If electrician only I estimate the numbers will match recent peaks in A34 and if it is set for anyone with retrofit training, we will observe record VEEC creations. In other words the scene is set for another gold rush, much like SPC's or more recently Highbays. By gold rush I mean there will be a lot of people trying to install as much as possible in shortest time to get rich quick. And like with previous gold rushes in VEET and other schemes previously, i.e. green loans or pink batts, the patterns are all the same and there is one risk factor it all comes down to - GREED. Not really accounted for, at least not officially, but greed is at the root of all problems with schemes like VEET. When given opportunity to make a lot of money fast, people stop thinking rationally, they take unnecessary risks and they are not concerned with any rules or compliance. People will come up with clever ways to get around the rules, and AP will come up with crazy marketing schemes, and I just hope the ESC has the capacity to police all of it and react fast to these risks.

With the above in mind,

- our proposed new mandatory safety training (MST) framework to mitigate the risks of activity 21A

The younger the person and the less experience and qualification they have, the more likely to give in to greed and disregard own safety and compliance. So I think the activity should be made electrician only. However, as this is not likely because of ESV not supporting electrician only installations, then next best thing, additional training modules to complete should be required and not by AP's but external training. In addition the training should be required to complete, not signed off by RPL.

- the transition arrangements which should be adopted which best manages safety risks after the consultation period and prior to implementation of the proposed ongoing new MST framework.

The transition arrangement should remain electrician only and for as long as possible to ensure that the final requirements are appropriate for the activity. With most suppliers getting stock mid to end of January, not much will happen until then and so the transition period of 1-2 months may not be long enough to test the activity live. Not sure if this is part of the consultation but I would extend the transition until the end of April or even June. There are already schemes, how to doorknock with electrician only requirement and I am sure there will be plenty of work to do under current requirements,

Best regards
Jack/Homelab