


ACT Energy Efficiency Improvement Scheme Compliance Plan 2019

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1 Purpose of the Document

The purpose of this document is to outline the resources, systems, processes and eligible activities to be implemented by ActewAGL Retail ('ActewAGL'), to ensure that all obligations and responsibilities required by the *Energy Efficiency (Cost of Living) Improvement Act 2012 (EEIS Act)*, as well as those detailed in the *Energy Efficiency (Cost of Living) Improvement (Record Keeping and Reporting) Code of Practice 2017 (Record Keeping Code of Practice)* are achieved for the 2019 Compliance Period. The document details the internal allocation of responsibilities, as well as the methods for collecting, organising and storing the information relevant to achieving the required greenhouse gas abatement.

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2 Estimated Electricity Sales and Retailer Energy Savings Obligations

ActewAGL has estimated electricity sales for the 2019 Compliance Period to be [REDACTED]

Based on the estimated electricity sales, ActewAGL's Retail Energy Saving Obligations (RESO) for the compliance period 1 January 2019 to 31 December 2019 are as follows:

[REDACTED]

Appendix 1 provides greater details of the inputs for the calculation of the 2019 ESO and PHT.

2.1 Retailer Energy Savings Obligation (ESO)

The ESO has been calculated as follows:

EST x (electricity sales x emissions multiplier) = [REDACTED]

[REDACTED]

- **EST** means the Energy Savings Target determined for the Compliance Period.
- **Electricity sales** means the ActewAGL's total electricity sales in MWh in the ACT for the Compliance Period.
- **Emissions multiplier** means the emissions multiplier determined for the Compliance Period.
- **Surplus** inputs are noted in Appendix 1.

2.2 Priority Household Target (PHT)

The PHT has been calculated as follows:

ESO x PHT = [REDACTED]

[REDACTED]

(Calculations are provided in Appendix 1)

- **PHT** means the Priority Household Target determined for the Compliance Period.
- **ESO** means the tier 1 NERL Retailer's Energy Savings Obligation for the Compliance Period.
- **Surplus** inputs are noted in Appendix 1.

2.3 Eligible activities and the approved abatement factors

The eligible activities and Activity Abatement Values (AAV), to be undertaken by ActewAGL in the ACT that have been used in preparation of this Compliance Plan are taken from the *Energy Efficiency (Cost of Living) Improvement (Eligible Activities) Determination 2017*.

Table 1 shows the activities that ActewAGL will continue to undertake into the 2019 Compliance Year as well as the new activities it intends to commence.

Table 1 – 2019 Compliance Period Activities

Activity ID	Eligible Activities	Approved/ planned	AAV tCO ₂ -e*
2.1	Install a specified high efficiency central electric space heater		
2.2	Replace a ducted gas space heater with a high efficiency ducted gas heater (6.00 Star rating with 23/29kW capacity)		
2.3	Install a specified high efficiency electric room heater		
2.4	Install insulated space conditioning ductwork (23/29kW capacity gas heater)		
3.1	Decommission an electric resistance water heater and install a specified high efficiency water heater		
3.2	Decommission a gas or liquefied petroleum gas water heater and install a specified high efficiency water heater		
4.2	Commercial lighting upgrade activities		
5.1	Decommissioning and disposal of a refrigerator or freezer (1 and 2 door)		

**Please note that due a number of variables the AAV factors will be dependent on replaced equipment and air-conditioning status of the premises as outlined in the Energy Efficiency (Cost of Living) Improvement (Eligible Activities) Determination 2017.*

The table in Appendix 2 provides greater detail about the eligible activities, number of products installed, Activity Abatement Values and the estimated number of premises per eligible activity. An Excel spread sheet will be provided as a supplement to this Compliance Plan.

3 Undertaking Eligible Activities

ActewAGL will comply with its obligations under the EEIS Act in order to support the ACT Government's plans to advance energy efficiency outcomes across the Territory's economy through the delivery of energy saving appliances, products and services.

3.1 Approved Programs

ActewAGL will maintain the following activities from the 2018 into the 2019 Compliance period;

- Activity 2.2 - ducted gas heating program in residential premises;
- Activity 2.3 – the installation of high efficiency room electric room heaters in residential premises. A significant proportion of this program is expected to be delivered into Housing ACT properties to support the PHT;
- Activity 2.4 - install insulated space conditioning ductwork whilst undertaking Activity 2.2 in residential premises. When Activity 2.1 is introduced space conditioning ductwork will form part of the installation;
- Activity 3.1 - Decommission an electric resistance water heater and install a specified high efficiency water heater;
- Activity 3.2 - Decommission a gas or liquefied petroleum gas water heater and install a specified high efficiency water heater;
- Activity 4.2 – commercial lighting upgrade activities in business premises; and
- Activity 5.1 – decommissioning and disposal of a refrigerator or freezer in residential and business premises.

3.2 Planned Activities

ActewAGL maintains a focus on monitoring activities with a view to expand the range of energy efficiency activities in its offering to the ACT. A new activity in the 2019 Compliance Period that ActewAGL plans to introduce is 'Activity 2.1 - Install a high efficiency central electric space heater'. ActewAGL will engage with the EEIS team and notify the Administrator prior to commencing.

ActewAGL will continue to participate in consultation with the ACT Government on the expansion of the range of activities eligible under the scheme.

3.3 Activity Volumes

Table 2 shows the volume of activities that ActewAGL intends to undertake. The number of average installations per property and number of installs for the above activities are estimates only. ActewAGL's intention is to monitor the program's effectiveness and adapt the programs to ensure the commercial offers, marketing and communication channels resources are most effectively utilised in their delivery

Table 2 – 2019 Compliance Period activity volumes

Activity ID	Eligible Activities	Average install per property	Estimated no of premises	Estimated number of installs
2.1	Install a high efficiency central electric space heater	1		
2.2	Replace a ducted gas space heater with a high efficiency ducted gas heater (6.00 Star rating with 23/29kW capacity)	1		
2.3	Install a high efficiency electric room heaters	1		
2.4	Install insulated space conditioning ductwork (23/29/35kW capacity gas heater)	1		
3.1	Decommission an electric resistance water heater and install a specified high efficiency water heater	1		
3.2	Decommission a gas or liquefied petroleum gas water heater and install a specified high efficiency water heater	1		
4.2	Commercial lighting upgrade activities	88*		
5.1	Decommissioning and disposal of a refrigerator or freezer (1 and 2 door)	1		

*refers to the estimated number LED lights (shop lights, high-bays and tubes) installed

4 Internal Allocation of Responsibilities

The ActewAGL staff that will support the delivery of ActewAGL's obligations under the Energy Efficiency Improvement Scheme (EEIS) include a team of energy efficiency specialists, contracted installation specialists, marketing specialists, and a dedicated management team. The ActewAGL Executive has provided its full support to the operational team to ensure that ActewAGL meets its obligations under the scheme - refer to Appendix 3.

The records of all abatement created under the EEIS are to be maintained and monitored by ActewAGL's Pricing and Market Development branch.

An Energy Efficiency Manager, nominated as the primary reporting contact and activity compliance contact, will continue to coordinate the ActewAGL's initiatives under the scheme and reports directly to the Manager, Pricing and Market Development. The appointed ActewAGL Manager, Energy Efficiency is responsible for:

- managing ActewAGL's participation in the EEIS, ensuring that its obligations for the compliance period 1 January 2019 – 31 December 2019 are met; and
- ensuring that ActewAGL complies with all requirements of the EEIS and undertaking remedial actions as required; and
- contract management of delivery partners and management of product stakeholders.

The Energy Efficiency Manager who will coordinate all periodic activity reporting and compliance period reports, will act as the primary reporting contact and will respond to ad-hoc report requests as required.

The contact details for ActewAGL's Manager, Energy Efficiency are as follows:

[REDACTED]
ActewAGL House
40 Bunda St, Civic
ACT 2601

[REDACTED]
ActewAGL's internal work teams will continue to deliver functions in accordance with their specific expertise as follows:

- Pricing and Market Development to manage and coordinate ActewAGL's reporting obligation and to also ensure current and future programs will comply with the EEIS.
- Customer Services will support customers by handling first-level product enquiries and complaints regarding the EEIS, and will act as an internal referral channel.
- Corporate Affairs will manage media enquiries and will coordinate other internal/ external communications as required.
- Wholesale and Environment will provide the RESO forecast and electricity sales figures for use in periodic activity and compliance period reporting.

- Finance will provide on-going commercial support and financial advice to the Manager, Energy Efficiency. They will assist with the preparation of ActewAGL's EEIS budget, and will assist with on-going performance monitoring against the agreed budget.
- Marketing will promote ActewAGL's eligible activities to the ACT market and will develop informational collateral for customers.
- Regulatory Compliance will conduct reviews on submissions to be made to the Administrator.
- Risk and Assurance provides general assurance as to the adequacy of the reporting arrangements to comply with the EEIS and provides consulting advice on the reporting arrangements to comply with the EEIS.
- People and Safety will provide compliance training materials, staff development, talent acquisition and manage diversity and inclusion policies.

Appendix 3 illustrates the allocation of organisational responsibilities for the delivery of ActewAGL's obligations under the EEIS.

5 Resources, Systems and Processes

5.1 Overview of Processes

In order to effectively deliver on the requirements set out in the EEIS, ActewAGL's planning gives consideration to (among other things) the following key activities:

- WHS;
- customer engagement – opportunities and requirements;
- contractor compliance and training;
- systems for recording activities; and
- installation verification and audit activities.

6 Quality, Health, Safety, Environment and Consumer Protection Requirements

6.1 ActewAGL Training

ActewAGL undertakes a formal communication and training program to build knowledge and awareness of the EEIS and ActewAGL's requirements as set out under the scheme. The communication and training program has been developed to ensure that staff members are aware of their obligations.

6.2 Contractor Training and Education

ActewAGL requires all Contractors to provide training on the EEIS to its employees (both contractors and installers). Training will refer to the performance of eligible activities, including guidelines for decommissioning practices. All training provided by Contractors will be periodically reviewed by ActewAGL's People and Safety team, to ensure that it meets the same minimum standards and requirements of an ActewAGL employee. ActewAGL will retain copies of the training information and provide input to training material as required. Examples of training documentation can be provided to ACT Government if required.

ActewAGL's contractual arrangements also ensure that obligations to meet quality, health, safety, environment and consumer protection requirements must be met. The Contractors are required to provide assurance that they have the systems and processes in place to ensure that the individuals undertaking eligible activities are competent to undertake the work in a safe manner. This includes systems for managing the mandatory licensing and training requirements.

As noted, Authorised Installers are also required to comply with requirements set out under (among other things) the Australian Direct Marketing Association (ADMA) Code of Practice, the Australian Consumer Law and the National Electricity Customer Framework. Details of these requirements are referenced in training documentation.

ActewAGL will be applying a proactive approach to monitoring performance and will work with the Contractors, to ensure that Authorised Installers are aware of any updates or new information as required. This process will include updating any additional training requirements identified after the commencement of the EEIS activities. ActewAGL will continue to work with the Contractors through the compliance period to ensure that installers are adequately trained and to ensure that any potential issues are appropriately managed.

6.3 'Fit and Proper' assessment for Authorised Installers

For the purpose of ensuring Authorised Installers undertaking eligible activities are fit and proper, a number of robust systems and processes are in place for the 2019 Compliance Period.

The systems and processes undertaken by ActewAGL and ActewAGL's contractors are:

- undertaking police checks on all personnel and requiring Working With Vulnerable People cards;

- requiring that personnel with any past criminal conviction must not be used to undertake eligible activities*;
- permitting ActewAGL Retail to direct that certain personnel not be used to undertake eligible activities;
- undertaking regular audits of the programs and associated documentation to ensure compliance with the EEIS and the above requirements;
- where an eligible activity must be undertaken by a licenced person, retaining a copy of relevant licences;
- undertaking personnel training regarding the EEIS; and
- ongoing training and monitoring of personnel, including via customer feedback.

**ActewAGL notes that due to the processing time for police checks (approximately 15 working days), in some cases personnel may commence performing eligible activities subject to the results of the police check. ActewAGL considers this is reasonable and conforms to standard business practice.*

7 Complaint and Dispute Resolution Procedures

7.1 ActewAGL Complaint policy

ActewAGL is committed to maintain the highest levels of customer service. Details of ActewAGL's customer service arrangements are set out in the Customer Charter. ActewAGL publishes its Customer Charter on the website - <https://www.actewagl.com.au/help-and-advice/legal/your-rights-and-obligations.aspx>.

In the event of a concern being raised by a customer ActewAGL has formal arrangements in place for managing complaints and dispute resolution.

ActewAGL refers to the AS ISO 10002:2006 definition of a complaint, being:

"An expression of dissatisfaction made to an organisation, related to its products/ services, or the complaints handling process itself where a response or resolution is explicitly or implicitly expected".

ActewAGL has an existing, compliant complaints policy which was established in accordance with AS ISO 10002:2006. The policy which sets out that ActewAGL can/ will:

- receive complaints by telephone, facsimile, email or letter
- resolve a complaint as soon as reasonably possible
- deal with complaints professionally, efficiently and fairly
- keep a customer advised of progress or changes
- discuss with a customer any cost that may be associated prior to undertaking any action
- provide reasons for all of ActewAGL's decisions
- learn from customer feedback and improve ActewAGL's service and product delivery
- treat all customers with courtesy and respect.

A copy of ActewAGL's Complaint and Dispute Resolution procedure is readily available to all customers on its website (refer to: <http://www.actewagl.com.au/About-us/Contact-us/Compliments-and-complaints/Complaints-handling-procedure.aspx>).

A reference to this procedure is also provided on individual Activity Record Forms, along with a contact number for ActewAGL's call centre for further customer support if required.

Appendix 2 – Eligible activities for 2019 Compliance Period

Code	Eligible Activities*	Average install per property	Activity Abatement Value	Estimate no of Premises	Total products installed	Total Abatement per activity	Notes
2.1	Install a high efficiency central electric space heater	1					
2.2	Replace a ducted gas space heater with a high efficiency ducted gas heater (6.00 Star rating with 23/29/35kW capacity)	1					
2.3	Install a high efficiency electric room heater	1					
2.4	Install insulated space conditioning ductwork (Part of Activity 2.2 - 23/29/35kW capacity gas heater, Part of Activity 2.1 (HC2C))	1					
3.1	Decommission an electric resistance water heater and install a specified high efficiency water heater	1					
3.2	Decommission a gas or liquefied petroleum gas water heater and install a specified high efficiency water heater	1					
4.2	Commercial Lighting Upgrade Activities	88					
5.1	Decommissioning and disposal of a refrigerator or freezer (1 and 2 door)	1					

*Please note that due a number of variables the AAV factors will be dependent on replaced equipment and conditioning status of the premises as outlined in the Energy Efficiency (Cost of Living) Improvement (Eligible Activities) Determination 2016.

Appendix 3 – Organisational structure

