13th October 2023

ESS Team IPART Level 16, 2-24 Rawson Place SYDNEY NSW 2000

Consultation on new heat pump water heater requirements Draft fact sheets – heat pump water heaters

Dear ESS team,

the scheme.

welcomes the opportunity to comment on the draft fact sheet for hot water heaters consultation.

strongly supports the introduction of the proposed fact sheet. Considering that the activity is relatively new, and that there is an increased number of scheme operators with no previous hot water/heat pump background, we suggest that the scheme administrator should provide additional training material for installers and service providers in order to protect the integrity and reputation of

Response to the Consultation Questions

1. Is there any content you think we should amend or add to the fact sheets?

Answer: While we believe that the content of the factsheet is adequate for customers, the content is high level and can be explained in further detail.

For example, it would be great to include on the two main types of heat pump water heaters

- Integrated with the tank and compressor combined.
- Split with the tank and compressor separate.

As another example, the integrated unit creates more noise in comparison to the split units which sits on the floor but takes more space. This type of additional information can assist customers make a better educated choice without sales pressure to choose what is on offer vs what is best for them.

For tanks size consideration, this can be expanded to include the use of hot water e.g. laundry, whether the family is growing and further explanation about shower time e.g. usual time for showers, how many showers and for how long.

Additionally, the current fact sheet advises on 100 litres per person/or bedroom which is inconsistent with the proposed calculations by OECC. It would be great that two departments can work together to have more consistency across the industry.

2. How would you provide the fact sheets to customers (e.g. a paper copy, a pdf in an email, a website link in an email or text message, a combination of these)?

Answer: While as an ACP we can automate the process to ensure that customer receives the factsheet along with the initial quotation. However, businesses have different business delivery and marketing approaches, and some may sell and install on at the same time and some may do them in different stages. There will be a case that there is no gap between the quote and installation which means customer will only receive a copy during the installation.

We suggest providing a paper copy in addition to sending the electronic format to the customers. This will also ensure that the elderly and less technology savvy customers are also receiving the correct format of the information in addition to the customers who are receiving the sales and install at the same time who may want to have a chance to review the material and ask the right questions.

3. What interactions could be used to give customers the fact sheets? Are some interactions better than others? Should it be different for HEER and IHEAB? For example: • the first contact point (e.g. with a mailbox flyer, door knock or first phone contact) • during the site inspection • another time (please provide details).

Answer: Considering that there are so many different business delivery models out in the market, we suggest making it as part of the first interaction with customer whether it is mailbox flyer or phone call or door knocking sales.

4. How much lead time do you need to get your business processes ready to provide customers with the fact sheets?

Answer: From the ACP point of view, it can be immediately built in the automated systems to get attached to the customer quotation email and it should be easy enough to expect service providers to hand out he hard copies within a few days after the introduction of this new requirement.

5. What evidence could you provide to show the customer received the fact sheet (e.g. a tick box in the nomination form)?

Answer: Given all the forms are automated, this can be easily demonstrated by showing the quotation email to customer with the attached factsheet emailed to them.

However, if handing the hardcopy fact sheet becomes a requirement, it would be hard to provide enough assurance that the fact sheet is given to the customer. IPART may require further investigation on audit scopes and/or introduction of additional compulsory photographic evidences.

Given the structure of current system, we don't see any value in adding the additional tick box to the nomination form.

6. Does a requirement to provide customers with the fact sheets have any impacts for your business? 7 Do you have any other feedback on any aspect of the fact sheets?
Answer: strongly support the introduction of this fact sheet and confirms that this won't have an impact on our business. We strongly support any step required to assist customers making the educated decisions and maintaining the integrity and reputation of the scheme.
Kind Regards,