

# Draft PIAM&V Method Requirements and Method Guide consultation – What we heard

14 April 2023

This paper summarises outcomes from our consultation on the draft PIAM&V Method Requirements (**Method Requirements**) and PIAM&V Method Guide (**Method Guide**) for the Project Impact Assessment with Measurement and Verification (**PIAM&V**) method under the Energy Savings Scheme (**ESS**). It includes a summary of stakeholder feedback and submissions, and our response.

During the consultation we sought input from stakeholders to ensure changes to the Method Requirements and Method Guide are appropriate and provide clear, accurate and accessible information. This consultation is part of our commitment to making it easier to engage with us, to consulting with you, and to being open to feedback.

Thank you to the stakeholders who provided feedback and submissions. We have used the feedback to finalise the Method Requirements and Method Guide.

## 1 Consultation process

We published the Method Requirements, Method Guide, and a consultation paper on the ESS website on 20 March 2023 and invited stakeholders to provide written submissions by 4 April 2023. We also emailed Accredited Certificate Providers (**ACPs**) accredited for PIAM&V, PIAM&V auditors and Measurement and Verification Professionals (**M&V Professionals**) approved by the Scheme Administrator seeking submissions.

We held an online workshop on 28 March 2023 to take stakeholders through the changes and receive their verbal feedback. We also met with the Energy Savings Industry Association (**ESIA**) on 30 March to hear its feedback.

## 2 Background

We updated the draft Method Requirements to reflect changes to the *Energy Savings Scheme Rule of 2009* (**ESS Rule**). We also substantially restructured the draft Method Guide to reflect key phases in a measurement and verification project and amendments to the ESS Rule. The draft Method Guide included evidence requirements, examples, and references to the PIAM&V Method Requirements where appropriate.

We sought feedback on:

- the changes to and any other feedback on the Method Requirements
- the approach to and content of the Method Guide
- changes to the evidence requirements in the Method Guide
- any other aspect of the Method Guide.

### 3 Consultation feedback

We received verbal feedback from stakeholders during the online workshop and meeting with ESIA. We received 3 written submissions. Submissions from Shell Energy and Ecovantage are published on our website. One submission was confidential.

We received some feedback relating to provisions in the ESS Rule, including the lack of transitional arrangements. These are outside the scope of this consultation. The Rule change provisions, and transitional arrangements are determined by the Office of Energy and Climate Change as the policy maker. We are committed to working with our stakeholders as they transition to the new provisions in the Rule.

The table below sets out the key themes of the feedback and submissions on the Method Requirements and Method Guide and our response to each issue. Feedback outside the scope of the consultation has not been included in the table. Written submissions are available on the [ESS website](#).

Stakeholder/topic	Summary of stakeholder feedback	IPART response
Method Requirements (No. 2)	Stakeholders requested that the Method Requirements (No. 2) be repealed due to impacts on projects with implementation dates in 2021 and potential inconsistencies with the ESS Rule.	We will repeal Method Requirements (No. 2) on 14 April 2023. This means the new approach outlined in the ESS Rule will apply to all projects, even those with implementation dates prior to 31 December 2021.
Evidence requirements – safety	Stakeholders requested clarification on the evidence requirements to demonstrate that safety levels had been maintained.	We note that the maintenance of safety levels has always been a requirement of the ESS Rule. The recent rule change means that safety is no longer a subset of service levels. We have adopted a less prescriptive, outcomes-based approach that acknowledges all sites are different and allows ACPs the flexibility to collect evidence that is relevant to the individual sites. To assist ACPs, we have added some examples of evidence to the method guide that may be provided to demonstrate that production, service and safety levels have been maintained. We note that these are examples only and other evidence may be provided to satisfy this requirement.
Method Requirement – signing Preliminary M&V Professional Report	Stakeholders noted that requiring the ACP (not the energy saver) to sign the Preliminary M&V Professional Report would have implications for existing projects and requested more clarity. They supported the change due to difficulties getting the Energy Saver to sign.	IPART has clarified the wording of this Method Requirement to make it clear that the ACP as the energy saver must sign the document. We have added a transitional arrangement to make it clear that Preliminary and final M&V Professional Reports signed by the original energy saver prior to the date the new Method Requirements come into effect still meet the requirements.
Information ACPs must provide	A stakeholder noted the changes to the Method Guide may require more information from ACPs.	We haven't added any new requirements unless it is in response to the ESS Rule change. The new layout of the Method Guide has made it easier to find requirements.
Use of the term 'should'	Stakeholders noted the term 'should' is used in the Method Guide and sought clarity on its meaning.	The Method Guide serves 2 purposes – setting out requirements and helping businesses navigate the requirements. 'Must' is used where setting out requirements. 'Should' is used deliberately when offering guidance on how to meet requirements to allow businesses flexibility to take an approach suited to the situation. We have reviewed the use of 'should' and changed to 'must' where appropriate or added clarification.
Measurement boundary	A stakeholder noted the requirements that energy savings be more than 10% of baseline energy use should be consistent with the IPMVP Core Concepts 2022.	Energy savings greater than 10% of the baseline energy consumption is consistent with Option C of the IPMVP, which states that a whole of site approach is best where savings are large compared to the variance in the baseline and reporting period energy data. We have changed the language to provide additional flexibility to ACPs and added clarification.